

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

CONOPCO, INC. dba UNILEVER
Petitioner

v.

THE PROCTOR & GAMBLE COMPANY
Patent Owner

Patent No. 6,451,300
Case No. IPR2013-00509

PETITIONER'S MOTION TO SEAL

Petitioner Conopco, Inc. dba Unilever (“Petitioner”) hereby moves to seal the following:

Exhibit 1036, the unredacted deposition testimony of Robert Y. Lochhead, Ph.D. A public, redacted version of the deposition testimony of Robert Y. Lochhead, Ph.D is filed as Petitioner Exhibit 1037.

Petitioner certifies that it has previously conferred with Patent Owner The Proctor and Gamble Company (“Patent Owner”) regarding the proposed default protective order, and agreement was reached. A Joint Motion to Enter Default Protective Order was filed. *See* Paper 34.

REASONS FOR SEALING

Each of the following portions of Petitioner’s Exhibits contain information designated confidential by Patent Owner under the Protective Order.

- A. Certain passages of the deposition testimony of Robert Y. Lochhead, Ph.D. taken on September 9, 2014: Exhibit 1036 (unredacted); Exhibit 1037 (redacted, public)

A public, redacted version of the deposition testimony of Robert Y. Lochhead, Ph.D. is filed as Petitioner Exhibit 1037, whereas a non-redacted version is filed as Exhibit 1036, which is to be kept under seal. Patent Owner has designated certain passages of the deposition testimony of Robert Y. Lochhead, Ph.D. as confidential pursuant to the Protective Order. Because Patent Owner has designated the subject information confidential, Petitioner will defer to Patent

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Owner to justify its designations in its response hereto, with Petitioner reserving
the right to contest any such designations in reply, if deemed warranted by
Petitioner.

Respectfully submitted,

Dated: September 23, 2014

By: /Joseph P. Meara/
Joseph P. Meara
Registration No. 44,932
Counsel for Petitioner

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing

PETITIONER'S MOTION TO SEAL is being served by electronic mail

September 23, 2014 on counsel for Patent Owner as follows:

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