

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

PETROLEUM GEO-SERVICES INC.
and
ION GEOPHYSICAL CORPORATION
AND ION INTERNATIONAL S.A.R.L.,

Petitioners,

v.

WESTERNGECO LLC

Patent Owner.

Case IPR2014-00688¹

U.S. Patent No. 7,080,607

**PATENT OWNER'S MOTION TO SEAL UNDER
37 C.F.R. §§ 42.14 AND 42.54**

¹ Case IPR2015-00567 has been joined with this proceeding.

Pursuant to 37 C.F.R. §§ 42.14 and 42.54, Patent Owner, WesternGeco L.L.C (“WesternGeco” or “Patent Owner”) submits this Motion to Seal Patent Owner’s Request for Rehearing Under 37 C.F.R. § 42.71(d) (“Patent Owner’s Request for Rehearing”) filed on January 14, 2016.

I. Reasons for Sealing Patent Owner’s Request for Rehearing

Patent Owner’s Request for Rehearing contains direct quotations from Exhibit 2069, which was previously designated as confidential in this proceeding because it contains confidential business information between PGS Geophysical A.S. and a third-party and is subject to a protective order in *WesternGeco L.L.C.v. Petroleum Geo-Services Inc.*, Civil Action No. 4:13-cv-02725.

II. Certification of Non-Publication Status

Patent Owner’s undersigned counsel certifies that the information sought to be sealed by this motion has not been published or otherwise made public to the best of his knowledge.

III. Certification of Conference with Opposing Party Pursuant to 37 C.F.R. § 42.54

At the time Ex. 2069 was filed in this proceeding, Patent Owner conferred in good faith with Petitioners, whom did not oppose Patent Owner’s original motion to seal the exhibit. Pursuant to that agreement, and the protective order in this case (Ex. 2038), Patent Owner’s Request for Rehearing containing direct quotations

from Exhibit 2069 is similarly being filed under seal.

IV. Request For Relief

Patent Owner requests that Patent Owner's Request for Rehearing remain under seal.

Respectfully submitted,
Oblon, McClelland, Maier &
Neustadt, LLP

Dated: January 14, 2016

/Michael L. Kiklis/
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CERTIFICATE OF SERVICE

The undersigned hereby certifies service of **MOTION TO SEAL** on the counsel of record for the Petitioners by filing this document through the Patent Review Processing System as well as delivering a copy via electronic mail to the following addresses:

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