

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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PETROLEUM GEO-SERVICES INC.

Petitioner

v.

WESTERNGECO, LLC

Patent Owner

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Case IPR2014-00688  
U.S. Patent No. 7,080,607

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

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 certain exhibits submitted with Patent Owner’s Response filed on March 20, 2014.

Patent Owner’s Response and certain accompanying exhibits were filed under seal because they contain information designated as confidential by Patent Owner, Petitioner, or a Third-Party. The below table lists those documents that the Patent Owner believes should remain under seal.

**I. Reasons for Sealing Certain Confidential Information**

**A. Patent Owner Response Exhibits**

Exhibits 2052, 2069, 2077, 2079, 2080, and 2086 were filed under seal. As set forth in Table 1, below, good cause exists for maintaining these exhibits under seal. It is noted that each of these exhibits is identical to exhibits with the same number in related proceedings IPR2014-00687 and IPR2014-00689.

**Table 1: Exhibits to Patent Owner’s Response that Should Remain Under Seal**

<b>Exhibit</b>	<b>Description</b>	<b>Good Cause</b>
2052	Excerpts of Deposition Transcript of Oyvind Hillesund, <i>WesternGeco L.L.C. v. Ion Geophysical Corporation</i> , Civil Action No. 4:09-CV-01827.	This exhibit contains party confidential information and is subject to a protective order in <i>WesternGeco L.L.C. v. Ion Geophysical Corporation</i> , Civil Action No. 4:09-CV-01827.
2069	Agreement Between PGS Geophysical A.S. and another	This exhibit contains confidential business information between PGS

Exhibit	Description	Good Cause
	party, <i>WesternGeco L.L.C.v. Petroleum Geo-Services Inc.</i> , Civil Action No. 4:13-cv-02725, PGS-JURID 00000158-183.	Geophysical A.S. and a third-party, and is subject to a protective order in <i>WesternGeco L.L.C.v. Petroleum Geo-Services Inc.</i> , Civil Action No. 4:13-cv-02725.
2077	Declaration of Robin C. Walker (“Walker Declaration”).	The Walker declaration is cited in support of Patent Owner’s Response and includes confidential business information of Patent Owner.
2079	Application of Q-Marine Technology for SPC; Imaging the Pinghu Field Gas Reservoirs by M. Garden, T. Bunting	This exhibit is a draft of an article published in Offshore magazine (July 2008) containing confidential information regarding WesternGeco’s Q-Marine system that was not released in the published article.
2080	Presentation Titled: “Q-Marine Improvements” by Robin Walker	This exhibit contains confidential business information regarding WesternGeco’s Q-Marine system included as part of an internal PowerPoint presentation.
2086	Presentation Titled: “4D Acquisition with Q-Marine Experiences and Strategies	This exhibit contains confidential business information regarding WesternGeco’s Q-Marine system included as part of an internal PowerPoint presentation.

## 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**

Patent Owner has in good faith conferred with Petitioner, and the parties have agreed to a protective order in this case, Ex. 2038. Petitioner has taken no position on whether it will oppose this motion.

**IV. Request For Relief**

Patent Owner requests that the following exhibits remain under seal:

2052, 2069, 2077, 2079, 2080, and 2086.

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

Dated: March 20, 2015

/Michael L. Kiklis/  
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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that the foregoing **MOTION TO SEAL** was served electronically on March 20, 2015, in their entirety upon the following counsel for Petitioner Petroleum Geo-Services, Inc.:

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