

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 certain exhibits submitted with Patent Owner’s Opposition to Petitioner Petroleum Geo-Services Inc.’s Motion to Exclude (“Patent Owner’s Opposition”) filed on July 6, 2015.

The following exhibits were filed under seal because they contain information designated as confidential by Patent Owner or Petitioners. 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 Opposition Exhibits

Exhibits 2103, 2114-2117, 2124-26, and 2129-2135 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 Opposition that Should Remain Under Seal

Exhibit	Description	Good Cause
2103	Corrected Declaration of	The Corrected Walker Declaration

Exhibit	Description	Good Cause
	Robin C. Walker (Originally filed as Ex. 2077)	includes confidential business information of Patent Owner.
2114	Excerpt of Deposition Transcript of Michael M. Burnham	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.
2115	Excerpt of Deposition Transcript of Jeffrey Wayne Cunkelman	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.
2116	Excerpt of Deposition Transcript of Hans Ivar Meyer	This exhibit contains party confidential information and is subject to a protective order in

Exhibit	Description	Good Cause
		<i>WesternGeco L.L.C. v. ION Geophysical Corporation</i> , Civil Action No. 4:09-CV-01827.
2117	Excerpt of Deposition Transcript of Hans Christian Vaage	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.
2124	Excerpt of Deposition Transcript of David Gentle	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.
2125	Excerpt of Deposition Transcript of David Moffat	This exhibit contains party confidential information and is

Exhibit	Description	Good Cause
		subject to a protective order in <i>WesternGeco L.L.C. v. ION Geophysical Corporation</i> , Civil Action No. 4:09-CV-01827.
2126	Excerpt of Deposition Transcript of Svein Dale	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.
2129	Document bearing Bates Nos. WG0000001–WG0000022	This exhibit contains confidential business information regarding WesternGeco's Q-Marine system.
2130	Document bearing Bates Nos. WG0000023–WG0000027	This exhibit contains confidential business information regarding WesternGeco's Q-Marine system.
2131	Spreadsheet titled H12305-	This exhibit contains confidential

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