

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.  
and  
ION GEOPHYSICAL CORPORATION  
AND ION INTERNATIONAL S.A.R.L.  
Petitioners

v.

WESTERNGECO, LLC  
Patent Owner

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Case IPR2014-00689<sup>1</sup>

U.S. Patent No. 7,293,520

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**PETITIONER PETROLEUM GEO-SERVICES INC.'S MOTION TO SEAL  
PORTIONS OF ITS REPLY IN SUPPORT OF MOTION TO EXCLUDE**

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<sup>1</sup> Case IPR2015-00565 has been joined with this proceeding.

Pursuant to 37 CFR § 42.14, Petitioner Petroleum Geo-Services Inc. (PGS) respectfully submits this Motion to Seal Portions of its Reply in Support of Motion to Exclude, which is being filed concurrently with this Motion.

### **I. Reasons for Redacting Portions of the Motion**

The standard governing the Board's determination of whether to grant a motion to seal is "good cause." *Garmin v. Cuozzo*, IPR2012-0001, Paper 36 (April 5, 2013). The board aims to "strike a balance between the public's interest in maintaining a complete and understandable file history and the parties' interest in protecting truly sensitive information." *Id.*

PGS's Motion discusses exhibits (1089, 2077, and 2103) that have been designated by WesternGeco as containing business confidential information. These exhibits, the statements and deposition transcript of Mr. Robin Walker in this proceeding, have been designated as confidential by WesternGeco. Pursuant to Section 4(A)(ii) of the Board's default protective order applicable in this proceeding, PGS has filed a confidential, non-redacted version of its Motion as well as a redacted version of its Motion to remove references and citations to the sealed information and exhibits. Because the redacted portions of the Motion are subject to the aforementioned protective orders, Petitioner brings this motion to seal with good cause.

### **II. Conclusion**

For the foregoing reasons, Petitioner requests that the Board grant Petitioner's Motion to Seal. Petitioner understands that the documents filed concurrently with this motion will remain sealed pending the outcome of the decision on this motion. *See* 37 C.F.R. § 42.14. Should the Board require it before deciding this motion, PGS is prepared to meet and confer with WesternGeco to prepare any Joint Motion to Seal that may be required to further clarify the bases for sealing the above documents.

Dated: July 13, 2015

Respectfully Submitted,

          /David Berl/  
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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that the above-captioned *Petitioner Petroleum Geo-Service Inc.*'s *Motion to Seal Portions of Its Reply in Support of Motion to Exclude* was served on July 13, 2015, by delivering a copy via electronic mail upon the following attorneys of record.

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