

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

ARRIS GROUP, INC.
Petitioner

v.

C-CATION TECHNOLOGIES, LLC
Patent Owner

CASE IPR2014-00454
Patent 5,563,883

**PATENT OWNER C-CATION TECHNOLOGIES, LLC'S
MOTION TO SEAL ITS PRELIMINARY RESPONSE**

Patent Owner C-Cation Technologies, LLC (“Patent Owner”) respectfully submits this Motion to Seal Its Preliminary Response, filed concurrently herewith.

Patent Owner moves to seal its Preliminary Response for the sole reason that the response refers to and discusses confidential documents produced by Petitioner Arris Group, Inc. (“Petitioner”). The documents in question were designated “PROTECTIVE ORDER MATERIAL” by Petitioner pursuant to the Board’s Order granting Petitioner’s request for a protective order (Paper 18).

Patent Owner is concurrently filing a redacted version of its Preliminary Response that will be available to the public.

Respectfully submitted,
KENYON & KENYON LLP

Date: August 27, 2014

/ Lewis V. Popovski /
Lewis V. Popovski
lpopovski@kenyon.com
Registration No. 37,423
Lead Counsel for Patent Owner
KENYON & KENYON LLP
One Broadway
New York, NY 10004-1007
Tel.: (212) 425-7200
Fax: (212) 425-5288

Backup Counsel:

Jeffrey S. Ginsberg
jginsberg@kenyon.com
Registration No. 36,148

David J. Kaplan
djkaplan@kenyon.com
Registration No. 57,117

David J. Cooperberg
dcooperberg@kenyon.com
Registration No. 63,250

KENYON & KENYON LLP
One Broadway
New York, NY 10004-1007
Tel.: (212) 425-7200
Fax: (212) 425-5288

Certificate of Service

The undersigned hereby certifies that the foregoing MOTION TO SEAL was served via e-mail on August 27, 2014, in its entirety on the following:

LEAD COUNSEL

Andrew R. Sommer
asommer@winston.com
WINSTON & STRAWN LLP
1700 K Street NW
Washington, D.C. 20006-3817
T: (202) 282-5000; F: (202) 282-5100

BACKUP COUNSEL

Jonathan E. Retsky
jretsky@winston.com
WINSTON & STRAWN LLP
35 West Wacker Drive
Chicago, IL 60601
T: (312) 558-3791; F: (312) 558-5700

KENYON & KENYON LLP

/ David J. Kaplan /
David J. Kaplan
Registration No. 57,117
Attorney for Patent Owner

Date: August 27, 2014
One Broadway
New York, NY 10004-1007
Tel.: (212) 425-7200