

By: Thomas Engellenner
Pepper Hamilton LLP
125 High Street
19th Floor, High Street Tower
Boston, MA 02110
(617) 204-5100 (telephone)
(617) 204-5150 (facsimile)

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

WAVEMARKET, INC. D/B/A LOCATION LABS
Petitioner

v.

LOCATIONNET SYSTEMS, LTD.
Patent Owner

Case No. IPR2014-00920
U.S. Patent 6,771,970

**PATENT OWNER LOCATIONNET SYSTEMS, LTD.'S
MOTION TO SEAL UNDER 37 C.F.R. 42.14 AND 42.55**

Pursuant to 37 C.F.R § 42.14 and 42.55, Patent Owner LocatioNet Systems, Ltd. submits its Patent Owner's Response under seal pursuant to Petitioner Wavemarket Inc. d/b/a Location Labs' designation of confidential information and pending Motion to Seal, filed on March 2, 2015 (Paper 26).

I. REASONS FOR SEALING PATENT OWNER'S RESPONSE

On February 18, 2015, Patent Owner deposed Petitioner's declarant, Dr. Scott Hotes. Following the deposition, Petitioner designated as confidential numerous portions of the deposition transcript. On March 2, 2015, Petitioner filed its Motion to Seal and for Entry of Protective Order Pursuant to 37 C.F.R. §§ 42.14 and 42.54 regarding the sealing of the portions of the February 18, 2015 deposition transcript of Dr. Scott Hotes (Ex. 1119).

In its Patent Owner's Response, Patent Owner has relied upon and cited to excerpts from Ex. 1119 that Petitioner has designated as confidential information pursuant to its Motion to Seal and Entry of Protective Order. *See* Paper 26. Patent Owner submits that most, if not all, of the information Petitioner has sought to seal in Ex. 1119 is not confidential because it is publicly available information, including in Petitioner's own press releases accessible via Petitioner's website. Accordingly, out of an abundance of caution, and subject to the Board's decision on Petitioner's Motion to Seal, Patent Owner concurrently files its Patent Owner's Response under seal to protect Petitioner's designated "confidential" information.

Dated: March 3, 2015

Respectfully submitted,
By: /Thomas Engellenner/
Thomas Engellenner, Reg. No. 28,711
Pepper Hamilton LLP
125 High Street
19th Floor, High Street Tower
Boston, MA 02110
(617) 204-5100 (telephone)
(617) 204-5150 (facsimile)
Attorney for Patent Owner

CERTIFICATE OF SERVICE

I hereby certify that on this 3rd day of March, 2015, a true and correct copy of the foregoing PATENT OWNER LOCATIONET SYSTEMS, LTD.'S MOTION TO SEAL UNDER 37 C.F.R. 42.14 AND 42.55 was served on the following counsel for Petitioner Wavemarket, Inc. d/b/a Location Labs via email:

Mark L. Hogge
Scott W. Cummings
Dentons US LLP
1301 K Street, N.W., Suite 600
Washington DC 20005
Tel: (202)408-6400
Fax: (202)408-6399

mark.hogge@dentons.com
scott.cummings@dentons.com

Dated: March 3, 2015

Respectfully submitted,
By: /Thomas Engellenner/
Thomas Engellenner, Reg. No. 28,711
Pepper Hamilton LLP
125 High Street
19th Floor, High Street Tower
Boston, MA 02110
(617) 204-5100 (telephone)
(617) 204-5150 (facsimile)
Attorney for Patent Owner