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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
OPPOSITION TO PETITIONER'S MOTION TO SEAL AND FOR ENTRY
OF PROTECTIVE ORDER PURSUANT TO 37 C.F.R. §§ 42.14 AND 42.54**

PATENT OWNER'S EXHIBITS

Ex. #	Description
2101	Corrected Petition For <i>Inter Partes</i> Review of U.S. Patent No. 6,771,970, IPR2014-00199, Paper 6.
2102	Decision Institution of <i>Inter Partes</i> Review 37 C.F.R. § 42.108, IPR2014-00199, Paper 18.
2103	Petitioner's Request For Rehearing Pursuant To 37 C.F.R. §§ 42.71(c)–(d) For Partial Reconsideration Of The Decision To Institute, IPR2014-00199, Paper 20.
2104	Decision On Request For Rehearing 37 C.F.R. § 42.71(d), IPR2014-00199, Paper 24.
2105	U.S. Patent No. 6,321,092 issued to Fitch, IPR2014-00199, Exhibit 1004.
2106	April 17, 2013, Copy of email from Edward M. Abbati, Vice President of Finance for Location Labs, to Richard Sanders, Chief Executive Officer of Callwave Communications, LLC.
2107	Sprint's Answer to CallWave's Complaint in <i>CallWave Communications, LLC v. Sprint Nextel Corp. and Google, Inc.</i> , Civil Action No. 1:12-cv-01702-RGA (D. Del.), Docket No. 71.
2108	AT&T's Answer to CallWave's Second Amended Complaint in <i>CallWave Communications, LLC v. AT&T Mobility, LLC, and Google, Inc.</i> , Civil Action No. 1:12-cv-01701-RGA (D. Del.), Docket No. 76.
2109	T-Mobile's Answer to CallWave's Complaint in <i>CallWave Communications, LLC v. T-Mobile USA Inc. and Google, Inc.</i> , Civil Action No. 1:12-cv-01703-RGA (D. Del.), Docket No. 68.

Ex. #	Description
2110	Petitioner's Opposition to Patent Owner's Motion for Additional Discovery, IPR2014-00199, Paper 33.
2111	Petitioner's Objections and Responses to CallWave's Subpoena in <i>CallWave Communications, LLC v. AT&T Mobility, LLC, and Google, Inc.</i> , Civil Action No. 1:12-cv-01701-RGA (D. Del.).
2112	Defendants' Opening Brief In Support Of Motion To Stay Proceedings On The '970 Patent Pending <i>Inter Partes</i> Review By The Patent Trial And Appeal Board, Civil Action No. 1:12-cv-01702-RGA (D. Del.), Docket No. 104.
2113	Case Docket as of September 9, 2014, <i>CallWave Communications, LLC v. Sprint Nextel Corp. and Google, Inc.</i> , Civil Action No. 1:12-cv-01702-RGA (D. Del.).
2114	Stipulation and Proposed Order Regarding Service and Extension of Time to Respond to Complaint, <i>CallWave Communications, LLC v. AT&T Mobility, LLC, and Google, Inc.</i> , Civil Action No. 1:12-cv-01701-RGA (D. Del.), Docket No. 8.
2115	Case Docket as of September 9, 2014, <i>CallWave Communications, LLC v. T-Mobile USA Inc. and Google, Inc.</i> , Civil Action No. 1:12-cv-01703-RGA (D. Del.).
2116	September 16, 2014 Hearing Transcript Excerpt, <i>CallWave Communications, LLC v. AT&T Mobility, LLC, and Google, Inc.</i> , Civil Action No. 1:12-cv-01701-RGA (D. Del.).
2117	August 28, 2014 Hearing Transcript Excerpt, <i>Callwave Communications, LLC v. Wavemarket, Inc.</i> , Civil Action No. 14MC80112-JSW (LB) (N.D. Cal.).
2118	Patent Owner's Proposed Discovery Requests to Petitioner.
2119	September 16, 2014 Hearing Full Transcript, <i>CallWave Communications, LLC v. AT&T Mobility, LLC, and Google, Inc.</i> ,

Ex. #	Description
	Civil Action No. 1:12-cv-01701-RGA (D. Del.).
2120	Case Docket as of January 7, 2015, <i>CallWave Communications, LLC v. AT&T Mobility, LLC, and Google, Inc.</i> , Civil Action No. 1:12-cv-01701-RGA (D. Del.).
2121	Agreed Protective Order, <i>CallWave Communications, LLC v. Sprint Nextel Corp. and Google, Inc.</i> , Case No. 1:12-cv-01702-RGA, Docket No. 136.
2122	December 17, 2014 Claim Construction Memorandum Opinion, <i>CallWave Communications, LLC v. AT&T Mobility, LLC, and Google, Inc.</i> , Civil Action No. 1:12-cv-01701-RGA (D. Del.), Docket No. 224.
2123	December 8, 2014 Videotaped Deposition Transcript of Craig Rosenberg, Ph.D.
2124	Declaration of Dr. Narayan Mandayam In Support of LocatioNet Systems, Ltd.'s Patent Owner Response
2125	February 19, 2015 Order, <i>CallWave Communications, LLC v. AT&T Mobility, LLC, and Google, Inc.</i> , Civil Action No. 1:12-cv-01701-RGA (D. Del.), Docket No. 313.
2126	August 10, 2014 Declaration of Dr. Narayan Mandayam, Exhibit 2016, IPR2014-00199.
2127	File History of U.S. Patent No. 6,771,970 (re-submitted because Petitioner's Ex. 1111 is a corrupted file)
2128	February 6, 2015 Joint Discovery Dispute Letter to the Court and Attachments, <i>Callwave Communications, LLC v. Wavemarket, Inc.</i> , Civil Action No. 14MC80112-JSW (LB) (N.D. Cal.), Docket No. 63.

Ex. #	Description
2129	February 23, 2015 Order Regarding Callwave and Location Labs' Joint Discovery Dispute Letter Dated February 6, 2015, <i>Callwave Communications, LLC v. Wavemarket, Inc.</i> , Civil Action No. 14MC80112-JSW (LB) (N.D. Cal.), Docket No. 64.

NEW EXHIBITS

Ex. #	Description
2130	"IAC Launches Ask Mobile GPS in the US," dated May 14, 2007 (available at www.locationlabs.com/iac-launches-ask-mobile-gps-in-the-us/).
2131	"uShip Uses Veriplace for Accurate Shipment Tracking," dated June 1, 2009 (available at www.locationlabs.com/uship-veriplace-for-accurate-shipment-tracking/).
2132	"Sprint® Customers Can Use GPS to Locate Loved Ones for Less with Sprint Family Locator on the Now Network," dated October 30, 2008 (available at www.locationlabs.com/sprint-customers-can-use-gps-to-locate-loved-ones-for-less-with-sprint-family-locator-on-the-now-networktm/).
2133	"AT&T Keeps Parents and Kids Connected with New AT&T FamilyMap Tool and Affordable New Devices," dated April 15, 2009 (available at www.locationlabs.com/att-keeps-parents-and-kids-connected-with-new-att-familymap-tool-and-affordable-new-devices/).
2134	"The Location Labs-AVG Marriage: The View from the CEO's Desk," dated September 25, 2014 (available at www.parksassociates.com/blog/article/the-location-labs-avg-marriage--the-view-from-the-ceo-s-desk).

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