

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

LG ELECTRONICS, INC.,
LG ELECTRONICS U.S.A., INC., and
LG ELECTRONICS MOBILECOMM U.S.A., INC.,
Petitioner

v.

CYPRESS SEMICONDUCTOR CORPORATION
Patent Owner

Case IPR2014-01386
Patent 6,012,103 B2

**PATENT OWNER'S
MOTION TO FILE UNDER SEAL**

Patent Owner Cypress Semiconductor Corporation (“Cypress”) hereby moves under 37 C.F.R. §§ 42.14 and 42.54 for leave to file under seal certain exhibits to the Patent Owner’s Response to LG Electronics, Inc., LG Electronics U.S.A., INC., and LG Electronics Mobilecomm U.S.A., Inc.’s, (“Petitioner”) Petition for *Inter Partes* Review (“IPR”) of U.S. Patent No. 6,012,103 B2 (“the ’103 patent”).

In support of this motion, Patent Owner Cypress states as follows:

1. The following Exhibits to the Patent Owner’s Response to the Petition for IPR contain confidential information, designated Protective Order Material: Exhibit 2018, Exhibit 2029, Exhibit 2030, Exhibit 2038, Exhibit 2039, Exhibit 2040, Exhibit 2041, Exhibit 2042, Exhibit 2043, Exhibit 2044, Exhibit 2045, Exhibit 2047, Exhibit 2048, Exhibit 2049, Exhibit 2050, Exhibit 2053, and Exhibit 2054. Good cause exists for sealing each of these exhibits, as they all contain confidential information as follows:

a. Exhibits 2029, 2030, 2038, 2043, 2047, 2048 and 2049 are Cypress internal presentations relating to the launch of a Cypress product and contain confidential Cypress business information that should not be made public because it relates to Cypress’ confidential financial, technical, sales, marketing strategies and other development and manufacturing information, which, if disclosed, would give Cypress’ competitors an insight into Cypress’ customer dealings, technology R&D and operational strategies.

b. Exhibits 2039, 2040, 2041, 2042, 2044, 2045, 2050, 2053 and 2054 contain summary information on Cypress sales, forecasts, customer identification and related data that is confidential Cypress business information that should not be made public, as, if disclosed it would give Cypress' competitors insight into Cypress' financial and market position.

c. Exhibit 2018 is a declaration of Cypress employee David G. Wright that describes and discusses the content of confidential Exhibits 2029, 2030, 2038 through 2045, 2048 through 2050, 2053 and 2054. For the same reasons described above that the content of these exhibits should not be made public, the sections of Exhibit 2018 relating to these exhibits should also not be made public, including paragraphs 14 through 20, 22 and 24 through 27 of Exhibit 2018.

2. A non-confidential version of Exhibit 2018 in which confidential information as described above has been redacted, is being filed together with this motion to seal. *See* Default Protective Order at 4(A)(ii). It is not practical to provide redacted version of Exhibits 2029, 2030, 2038 through 2045, 2047 through 2050, 2053 and 2054, as essentially the entire content of these Exhibits is confidential.

3. Cypress submits proposes that these documents be sealed under the default protective order. Office Patent Trial Practice Guide, 77 Fed. Reg. 48,756, 48760. A copy of the default protective order is attached as Appendix A to this motion.

Dated: June 5, 2015

Respectfully submitted,

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Counsel for Patent Owner
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CERTIFICATE OF SERVICE

Pursuant to 37 CFR §§ 42.6(e)(4) and 42.205(b), the undersigned certifies that on June 5, 2015, a complete and entire copy of this Patent Owner Cypress Semiconductor Corp.'s Motion to Seal was provided via email to the Petitioner by serving the correspondence email address of record as follows:

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