

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

PETROLEUM GEO-SERVICES INC.

Petitioner,

v.

WESTERNGECO LLC

Patent Owner.

Case IPR2014-01477

U.S. Patent No. 7,080,607

**PATENT OWNER'S UNOPPOSED MOTION TO SEAL UNDER
37 C.F.R. §§ 42.14 AND 42.54**

Pursuant to 37 C.F.R. §§ 42.14 and 42.54, Patent Owner, WesternGeco L.L.C (“WesternGeco” or “Patent Owner”) files this Motion to seal certain exhibits submitted with Patent Owner’s Opposition to Petitioner Petroleum Geo-Services Inc.’s Motion to Exclude (“Patent Owner’s Opposition”) filed on October 28, 2015.

The following exhibits were filed under seal because they contain information designated as confidential by Patent Owner or ION Geophysical S.A.R.L. The below table lists those documents that the Patent Owner believes should remain under seal.

I. Reasons for Sealing Certain Confidential Information

A. Patent Owner Opposition Exhibits

Exhibits 2149-2152 and 2158-2160 were filed under seal. As set forth in Table 1, below, good cause exists for maintaining these exhibits under seal. It is noted that each of these exhibits is identical to exhibits with the same number in related proceedings IPR2014-01475 and IPR2014-01478.

Table 1: Exhibits to Patent Owner’s Opposition that Should Remain Under Seal

Exhibit	Description	Good Cause
2149	Excerpt of Deposition	This exhibit contains party

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Exhibit	Description	Good Cause
	<p>Transcript of Michael M. Burnham</p>	<p>confidential information and is subject to a protective order in <i>WesternGeco L.L.C. v. ION Geophysical Corporation</i>, Civil Action No. 4:09-CV-01827.</p>
2150	<p>Excerpt of Deposition Transcript of Jeffrey Wayne Cunkelman</p>	<p>This exhibit contains party confidential information and is subject to a protective order in <i>WesternGeco L.L.C. v. ION Geophysical Corporation</i>, Civil Action No. 4:09-CV-01827.</p>
2151	<p>Excerpt of Deposition Transcript of Hans Ivar Meyer</p>	<p>This exhibit contains party confidential information and is subject to a protective order in <i>WesternGeco L.L.C. v. ION Geophysical Corporation</i>, Civil Action No. 4:09-CV-01827.</p>

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Exhibit	Description	Good Cause
2152	Excerpt of Deposition Transcript of Hans Christian Vaage	This exhibit contains party confidential information and is subject to a protective order in <i>WesternGeco L.L.C. v. ION Geophysical Corporation</i> , Civil Action No. 4:09-CV-01827.
2158	Excerpt of Deposition Transcript of David Gentle	This exhibit contains party confidential information and is subject to a protective order in <i>WesternGeco L.L.C. v. ION Geophysical Corporation</i> , Civil Action No. 4:09-CV-01827.
2159	Excerpt of Deposition Transcript of David Moffat	This exhibit contains party confidential information and is subject to a protective order in <i>WesternGeco L.L.C. v. ION Geophysical Corporation</i> , Civil

Exhibit	Description	Good Cause
		Action No. 4:09-CV-01827.
2160	Excerpt of Deposition Transcript of Svein Dale	This exhibit contains party confidential information and is subject to a protective order in <i>WesternGeco L.L.C. v. ION Geophysical Corporation</i> , Civil Action No. 4:09-CV-01827.

II. Certification of Non-Publication Status

Patent Owner's undersigned counsel certifies that the information sought to be sealed by this motion has not been published or otherwise made public to the best of his knowledge.

III. Certification of Conference with Opposing Party Pursuant to 37 C.F.R. § 42.54

The parties have conferred regarding a protective order and have agreed to the protective order in this case, Ex. 2038. Also, Patent Owner has conferred with Petitioner about this motion, and Petitioner does not oppose it.

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