

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

PETROLEUM GEO-SERVICES INC.
Petitioner

v.

WESTERNGECO, LLC
Patent Owner

Case IPR2014-01477¹

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

**PETITIONER'S MOTION TO SEAL
PORTIONS OF ITS REPLY IN SUPPORT OF MOTION TO EXCLUDE
UNDER 37 CFR § 42.14**

¹ Case IPR2014-00688 is a related proceeding

Pursuant to 37 CFR § 42.14, Petitioner Petroleum Geo-Services Inc. (PGS) respectfully submits this Motion to Seal Portions of its Reply in Support of Motion to Exclude, which is being filed concurrently with this Motion.

I. Reasons for Redacting Portions of the Reply

The standard governing the Board’s determination of whether to grant a motion to seal is “good cause.” *Garmin v. Cuozzo*, IPR2012-0001, Paper 36 (April 5, 2013). The board aims to “strike a balance between the public’s interest in maintaining a complete and understandable file history and the parties’ interest in protecting truly sensitive information.” *Id.* PGS’s Reply discusses exhibits (1114, 1119, and 2099) that have been designated by WesternGeco as containing business confidential information. These exhibits—including the declaration and deposition transcripts of Mr. Robin Walker in this proceeding—have been designated as confidential by WesternGeco.

Pursuant to Section 4(A)(ii) of the Board’s default protective order applicable in this proceeding, PGS has filed a confidential, non-redacted version of its Reply as well as a redacted version of its Reply to remove references and citations to the sealed information and exhibits. Because the redacted portions of the Reply are subject to WesternGeco’s confidentiality designations, Petitioner brings this motion to seal with good cause.

II. Conclusion

For the foregoing reasons, Petitioner requests that the Board grant Petitioner's Motion to Seal. Petitioner understands that the documents filed concurrently with this motion will remain sealed pending the outcome of the decision on this motion. *See* 37 C.F.R. § 42.14. Should the Board require it before deciding this motion, PGS is prepared to meet and confer with WesternGeco to prepare any Joint Motion to Seal that may be required to further clarify the bases for sealing the above documents.

Dated: November 4, 2015

Respectfully Submitted,

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that the above-captioned Petroleum Geo-Service Inc.'s "Motion to Seal Portions of Its Reply in Support of Motion to Exclude Under 35 C.F.R. § 42.55" was served to the Patent Owner by delivering a copy via electronic mail upon the following attorneys of record.

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