

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

PETROLEUM GEO-SERVICES INC.

Petitioner

v.

WESTERNGECO, LLC

Patent Owner

Case IPR2014-01478
U.S. Patent No. 7,293,520

**PATENT OWNER'S 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”) submits this Motion to Seal certain exhibits submitted with Patent Owner’s Response filed on August 7, 2015.

Patent Owner’s Response and certain accompanying exhibits were filed under seal because they contain information designated as confidential by Patent Owner, Petitioner, or a Third-Party. 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 Response Exhibits

Exhibits 2053, 2057, 2059–2061, 2067, 2085, 2093, 2099, 2101, 2102, 2108, 2127–2132, and 2142 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 IPR2014-01477.

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

Exhibit	Description	Good Cause
2053	ION’s Response to WesternGeco’s Motion to Disqualify ION’s	This exhibit contains ION’s confidential information and is subject to a protective order in

Exhibit	Description	Good Cause
	Consultants/Experts, <i>WesternGeco L.L.C. v. Ion Geophysical Corporation,</i> Civil Action No. 4:09-CV-01827	<i>WesternGeco L.L.C. v. ION Geophysical Corporation,</i> Civil Action No. 4:09-CV-01827.
2057	Agreement Between PGS Geophysical A.S. and another party, <i>WesternGeco L.L.C.v. Petroleum Geo-Services Inc.,</i> Civil Action No. 4:13-cv-02725, PGS-JURID_00000158-183.	This exhibit contains confidential business information between PGS Geophysical A.S. and a third-party, and is subject to a protective order in <i>WesternGeco L.L.C.v. Petroleum Geo-Services Inc.,</i> Civil Action No. 4:13-cv-02725.
2059	Deposition Transcript of John Thompson	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.
2060	<i>WesternGeco L.L.C. v. Ion Geophysical Corporation,</i> Civil Action No. 4:09-CV-01827, ION756394	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.
2061	<i>WesternGeco L.L.C. v. Ion Geophysical Corporation,</i> Civil Action No. 4:09-CV-01827, ION705039	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.
2067	WesternGeco L.L.C. v. Ion Geophysical Corporation, Civil Action No. 4:09-CV-01827, ION893699	This exhibit contains party confidential information and is subject to a protective order in <i>WesternGeco L.L.C. v. ION</i>

Exhibit	Description	Good Cause
		<i>Geophysical Corporation</i> , Civil Action No. 4:09-CV-01827.
2085	Excerpt of Deposition Transcript of Oyvind Hillesund	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.
2093	Declaration of Dr. Jack Cole Submitted in IPR2014-01477	This exhibit was previously designated as confidential by Petitioner.
2099	Declaration of Robin C. Walker (“Walker Declaration”).	The Walker declaration is cited in support of Patent Owner’s Response and includes confidential business information of Patent Owner.
2101	Application of Q-Marine Technology for SPC; Imaging	This exhibit is a draft of an article published in <i>Offshore</i> magazine (July

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