

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

GOOGLE INC.,
Petitioner

v.

SUMMIT 6 LLC,
Patent Owner

Case: IPR2015-00806
Patent 7,765,482

**PETITIONER'S UNOPPOSED MOTION TO SEAL
PURSUANT TO 37 C.F.R. § 42.54**

Petitioner Google Inc. (“Petitioner”) hereby moves under the Standing Protective Order to seal (1) Petitioner’s Reply to Patent Owner’s Response (“Reply”) and (2) Exhibits 1015, 1016, and 1018 submitted with the Reply. The Standing Protective Order was filed June 15, 2015, by the Patent Owner and agreed upon by both parties. Paper 15. Petitioner met and conferred with Patent Owner Summit 6 LLC (“Patent Owner”), who does not oppose this motion to seal.

Petitioner submits its Reply concurrently with this motion. In support of its Reply, Petitioner submits two deposition transcripts that Patent Owner has requested Petitioner designate as PROTECTIVE ORDER MATERIAL (Exhibits 1015 and 1016) as well as an expert declaration that relies upon documents that Patent Owner has designated as PROTECTIVE ORDER MATERIAL (Exhibit 1018).

Petitioner is filing a redacted version of its Reply as a public document. A full version of the Reply is also filed as “Parties and Board Only.” Exhibits 1015, 1016, and 1018 are filed as Parties and Board Only. Petitioner has served Patent Owner with both a full version and a redacted version of the Reply and with full versions of Exhibits 1015, 1016, and 1018.

The Parties have agreed that Patent Owner will provide redacted versions of Exhibits 1015, 1016, and 1018 within a reasonable period of time subsequent to the

filing of this Motion. These redacted versions will be filed as publicly available exhibits.

For the foregoing reasons, Petitioner respectfully requests that the Board grant this unopposed motion to seal.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'John Alemanni', with a long horizontal flourish extending to the right.

By:
John Alemanni (Registration No. 47,384)
Lead Counsel for Petitioner

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of **PETITIONER'S UNOPPOSED MOTION TO SEAL PURSUANT TO 37 C.F.R. § 42.54** has been served via email upon the following:

Peter J. Ayers
peter@leehayes.com
John Shumaker
jshumaker@leehayes.com
Brian Mangum
brianm@leehayes.com

LEE & HAYES, PLLC
11501 Alterra Parkway, Suite 450
Austin, TX 78758

Dated: March 9, 2016



By:
John Alemanni
Registration No. 47,384

Lead Counsel	Back-Up Counsel
John Alemanni Registration No. 47,384 JAlemanni@kilpatricktownsend.com	Michael Morlock Registration No. 62,245 MMorlock@kilpatricktownsend.com
<u>Postal and Hand-Delivery Address:</u> Kilpatrick Townsend & Stockton LLP 1001 West Fourth Street Winston-Salem, NC 27101-2400 Telephone: (336) 607-7311 Fax: (336) 607-7500	<u>Postal and Hand-Delivery Address:</u> Kilpatrick Townsend & Stockton LLP 1001 West Fourth Street Winston-Salem, NC 27101-2400 Telephone: (336) 607-7391 Fax: (336) 607-7500