

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

J SQUARED, INC. d/b/a UNIVERSITY LOFT COMPANY

Petitioner

v.

SAUDER MANUFACTURING COMPANY

Patent Owner

Case IPR2015-00958

Patent No. 8,585,136

CHAIR WITH COUPLING
COMPANION STOOL BASE

JOINT MOTION TO SEAL

Sauder Manufacturing Company (“Patent Owner”), and J Squared, Inc. d/b/a University Loft Company (“Petitioner”) by and through their respective counsel of record, hereby move to seal certain documents identified herein and move for entry of a Protective Order for the following reasons:

In support of its Trial Response, Patent Owner intends to file as Exhibits certain excerpts of deposition transcripts and documents that contain information Petitioner deems confidential commercial information, specifically customer names, vendor names and financial information. In addition, Patent Owner will be filing the Declaration of Phillip Bontrager that contains confidential financial information.

Pursuant to 37 C.F.R. § 42.54, protective orders may be issued for good cause to protect a party from disclosing confidential information. The parties hereby respectfully request permission to seal these certain documents and request entry of the proposed default protective order set forth in the Office Patent Trial Practice Guide, filed concurrently as Exhibit 4001.

Good cause exists for sealing the documents as they each include confidential commercial business information regarding customer and vendor names, as well as Petitioner’s confidential financial information. 37 C.F.R. § 42.54. Each undersigned counsel certifies that the information associated with his client for which counsel wishes protection has not been published or otherwise made public. The parties have undertaken efforts to maintain the confidentiality of

this information in the related District Court proceeding. The “attorneys eyes only” designation from the deposition transcripts was redacted by stipulation of counsel.

Respectfully submitted,

/s/Thomas N. Young

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Attorney for Petitioner

Dated: November 21, 2015

CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. §§ 42.6(e)(4) and 42.205(b), the undersigned certifies that on November 21, 2015, a complete and entire copy of the foregoing was provided via Federal Express, by serving the correspondence address of record as follows:

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