

Paper No. \_\_\_\_  
Date Filed: September 11, 2015

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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LUPIN LIMITED  
Petitioner

v.

JANSSEN SCIENCES IRELAND UC  
Patent Owner

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CASE No. IPR2015-01030  
U.S. Patent No. 8,518,987 B2

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**JOINT MOTION TO SEAL AND FOR ENTRY OF  
PROTECTIVE ORDER UNDER 37 C.F.R. §§ 42.14 AND 42.54**

Pursuant to 37 C.F.R. §§ 42.14 and 42.54, Patent Owner Janssen Sciences Ireland UC (“Patent Owner”) and Petitioner Lupin Limited (“Petitioner”) (collectively, the “Parties”) jointly submit this motion to seal Exhibits 2048, 2049, and 2051 and PATENT OWNER’S REPLY ON THE REAL PARTY-IN-INTEREST ISSUE, which Patent Owner filed on September 11, 2015. The Parties also move for entry of the Board’s Default Protective Order contained in Appendix B to the Patent Trial Practice Guide. Pursuant to paragraph 4(A)(ii) of the Board’s Default Protective Order, Patent Owner is also concurrently filing non-confidential versions of each of the documents referenced above with the confidential portions redacted.

### **I. Reasons for Sealing Certain Confidential Information**

With respect to Exhibits 2048, 2049, and 2051, Petitioner states that these exhibits contain (i) confidential Lupin Ltd. commercial and business information and (ii) private employment status of individuals from India that is preserved as confidential under, *inter alia*, Indian law. Therefore, good cause exists for filing Exhibits 2048, 2049, and 2051 under seal.

With respect to PATENT OWNER’S REPLY ON THE REAL PARTY-IN-INTEREST ISSUE, Patent Owner states that the confidential version of this reply brief was filed under seal because it cites to material contained in Exhibits 2048, 2049, and 2051 that Petitioner has designated as confidential. To the extent good

cause has been shown by Petitioner with respect to portions of the above-referenced exhibits, good cause also exists for sealing the portions of the reply brief referencing the sealed portions of those exhibits.

## **II. Certification of Non-Publication Status**

The Parties' undersigned counsel certify that with respect to the exhibits as to which Petitioner has provided a showing of good cause in Section I above, the information sought to be sealed by this motion has not, to the best of their knowledge, been published or otherwise made public.

## **III. Certification of Conference of the Parties Pursuant to 37 C.F.R. § 42.54**

The Parties have conferred in good faith and have agreed to the terms of the Board's Default Protective Order and to seal the exhibits and reply brief discussed above. The proposed Protective Order submitted herewith as Exhibit 2052 is executed by counsel for both Parties.

## **IV. Proposed Protective Order**

The Proposed Protective Order submitted herewith as Exhibit 2052 is the Board's Default Protective Order to which the Parties agree to be bound in this matter.

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For the foregoing reasons, the Parties respectfully request that the Board enter an Order sealing the confidential versions of Exhibits 2048, 2049, and 2051 and

the confidential version of PATENT OWNER'S REPLY ON THE REAL PARTY-IN-INTEREST ISSUE, and requiring the parties to abide by the Protective Order submitted herewith.

Dated: September 11, 2015

Respectfully submitted,

Lupin Limited  
Petitioner

Janssen Ireland Science UC  
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Dated: September 11, 2015

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Motion to Seal and for Entry of Protective Order

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