

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

RPX CORPORATION,
Petitioner

v.

APPLICATIONS IN INTERNET TIME LLC,
Patent Owner

Case IPR2015-01750
US Patent No. 8,484,111

Case IPR2015-01751
Case IPR2015-01752
Patent 7,356,482 B2¹

PATENT OWNER'S MOTION FOR ENTRY OF PROTECTIVE ORDER,
MOTION TO SEAL, AND MOTION TO REDACT

¹ The word-for-word identical paper is filed in each proceeding identified in the heading.

Patent owner Applications in Internet Time LLC respectfully submits this Motion for Entry of Protective Order, Motion to Seal, and Motion to Redact.

Pursuant to 37 C.F.R. § 42.54, patent owner moves for entry of the Default Protective Order set forth in the Office Patent Trial Practice Guide. *See* The Office Patent Trial Practice Guide, 77 Fed. Reg. 48756, 48771 (Aug. 14, 2012).

Pursuant to 37 C.F.R. § 42.14, patent owner moves to seal Exhibits 2018, 2019 and 2022 for the sole reason that these exhibits are documents designated “PROTECTIVE ORDER MATERIAL” by petitioner. Petitioner produced these documents to patent owner in response to patent owner’s request for additional discovery, which itself was ordered by the Board in Paper 11.

Pursuant to 37 C.F.R. § 42.14, patent owner moves to seal its preliminary response for the sole reason that it refers to and discusses the three sealed exhibits. Concurrently with the unredacted version of its preliminary response, patent owner is filing a redacted version that will be available to the public.

Patent owner has in good faith attempted to confer with petitioner’s counsel regarding this motion. Petitioner’s counsel has not responded to patent owner’s request, most likely due to the Thanksgiving holiday.

Date: November 27, 2015

Respectfully submitted,

By: /Steven C. Sereboff/
Steven C. Sereboff (Reg. No. 37,035)
ssereboff@socalip.com
M. Kala Sarvaiya (Reg. No. 58,912)
ksarvaiya@socalip.com
SoCal IP Law Group LLP
310 N. Westlake Boulevard, Suite 120
Westlake Village, CA 91362
Telephone: (805) 230-1350
Fax: (805) 230-1355
*Attorneys for Applications in Internet Time
LLC*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of this PATENT OWNER'S MOTION FOR ENTRY OF PROTECTIVE ORDER, MOTION TO SEAL, AND MOTION TO REDACT has been served via email on November 27, 2015, upon the following:

Richard F. Giunta
Elisabeth H. Hunt
Randy J. Pritzker

Rgiunta-PTAB@wolfgreenfield.com
EHunt-PTAB@wolfgreenfield.com

Dated: November 27, 2015

By: /Steven C. Sereboff/
Steven C. Sereboff
SoCal IP Law Group LLP