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Paper No. ____

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

RPX CORPORATION,
Petitioner,

v.

APPLICATIONS IN INTERNET TIME, LLC,
Patent Owner.

IPR2015-01751
Patent 7,356,482 B2

**PETITIONER'S MOTION TO EXPUNGE CONFIDENTIAL
INFORMATION AND CONTINGENT MOTION TO KEEP
CONFIDENTIAL AND SEPARATE**

TABLE OF CONTENTS

I. INTRODUCTION1

II. APPLICABLE LEGAL STANDARDS4

III. GOOD CAUSE EXISTS FOR EXPUNGING THE CONFIDENTIAL
DOCUMENTS.....5

 A. Documents with Redacted Versions Available5

 B. Documents Sealed in Their Entirety without Redacted Versions8

IV. CONCLUSION.....12

APPENDIX14

TABLE OF AUTHORITIES

CASES

Applications in Internet Time, LLC v. RPX Corp.,
897 F.3d 1336 (Fed. Cir. 2018).....12

Atlanta Gas Light Co. v. Bennett Regulator Guards, Inc.,
IPR2013-00453, Paper 97 (P.T.A.B. Apr. 15, 2015)..... 5, 8, 9

OTHER AUTHORITIES

Consolidated Trial Practice Guide (Nov. 2019)4

REGULATIONS

37 C.F.R. § 42.56 1, 4, 13

I. INTRODUCTION

Pursuant to 37 C.F.R. § 42.56 and as authorized by the Board in its August 24, 2020 Order Granting Petitioner's Motions to Seal (Paper 122 at 9), Petitioner RPX Corporation respectfully requests that, for the reasons set forth below, the Board expunge from the record the confidential information that the Board previously ordered sealed in this proceeding. If the Board denies in whole or in part Petitioner's expungement request, Petitioner requests that any document(s) the Board previously ordered sealed but does not order expunged be kept confidential and separate from the files of the involved patent. The parties have conferred, and Patent Owner indicated it may oppose expungement, but Patent Owner does not oppose maintaining the record sealed and confidential.

Specifically, Petitioner requests that the following documents currently under seal be expunged from the record, because these documents contain Petitioner's highly confidential business information and because redacted versions of many of these documents were filed in the record and are currently available to the public:¹

¹ Petitioner is concurrently filing Motions to Expunge in related proceedings IPR2015-01750 and IPR2015-01752. The table below lists the paper and exhibit numbers of the sealed documents in IPR2015-01751, and the table provided as an

Document Description of Sealed Documents	Paper / Exhibit No.
Patent Owners Preliminary Response	Paper 20
Petitioner's Reply to Patent Owner's Preliminary Response on Real-Party-In-Interest (RPI)	Paper 28
Petitioner's Motion for Sanctions (PROTECTIVE ORDER MATERIAL)	Paper 34
Patent Owner's Sur-Reply to Petition for Inter Partes Review (unredacted)	Paper 38
Patent Owner's Updated List of Exhibits	Paper 39
AIT's Opposition to Motion for Sanctions	Paper 40
Patent Owner's Updated List of Exhibits	Paper 41
Decision to Institute Inter Partes Review	Paper 51
Petitioner's Opening Brief (CONFIDENTIAL)(Corrected)	Paper 100
Patent Owner's Opposition (CONFIDENTIAL)	Paper 102
Petitioner's Reply Brief (Confidential)	Paper 103
Hearing Transcript - Confidential	Paper 112
JUDGMENT Final Decision on Remand Terminating Institution 35 U.S.C. 314, 315	Paper 125
RPX000099 - RPX000233 (PROTECTIVE ORDER MATERIAL)	Ex. 1019
RPX000014 - RPX000025 (PROTECTIVE ORDER MATERIAL)	Ex. 1020
RPX000009 - RPX000011(PROTECTIVE ORDER MATERIAL)	Ex. 1021
RPX000012 - RPX000013 (PROTECTIVE ORDER MATERIAL)	Ex. 1022
RPX000224 - RPX000271(PROTECTIVE ORDER MATERIAL)	Ex. 1023
RPX000076 (PROTECTIVE ORDER MATERIAL)	Ex. 1024
RPX000047 - RPX000067 (PROTECTIVE ORDER MATERIAL)	Ex. 1025
Email From R. Giunta, dated November 29, 2015 (PROTECTIVE ORDER MATERIAL)	Ex. 1029

appendix to this motion lists the corresponding paper and exhibit numbers across all three related proceedings.

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