

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 SECOND MOTION TO SEAL AND REDACT

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

Patent Owner Applications in Internet Time LLC respectfully submits this Second Motion to Seal and to Redact.

Pursuant to 37 C.F.R. § 42.14, Patent Owner moves to seal Exhibits 2025 for the sole reason that this exhibit was designated “PROTECTIVE ORDER MATERIAL” by Petitioner. Patent Owner also moves to seal Exhibit 2026 because it incorporates information from documents designated “PROTECTIVE ORDER MATERIAL” by Petitioner.

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 these exhibits and other exhibits which Petitioner has designated “PROTECTIVE ORDER MATERIAL.” Concurrently with the unredacted version of its sur-reply to the preliminary response, Patent Owner is filing a redacted version that Patent Owner requests be made available to the public after a determination on the pending motions to seal by both parties.

Patent Owner has in good faith attempted to confer with Petitioner’s counsel regarding this motion. Petitioner’s counsel has agreed to the form of this filing.

Date: December 23, 2015

Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of this PATENT OWNER'S SECOND MOTION TO SEAL AND REDACT has been served via email on December 23, 2015, upon the following:

Richard F. Giunta
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Dated: December 23, 2015

By: /Anneliese Lomonaco/
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