

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

ACTIVISION BLIZZARD, INC.,
ELECTRONIC ARTS INC.,
TAKE-TWO INTERACTIVE SOFTWARE, INC.,
2K SPORTS, INC.,
ROCKSTAR GAMES, INC., and
BUNGIE, INC.,
Petitioner,
v.

ACCELERATION BAY, LLC,
Patent Owner.

Case IPR2015-01972¹
Patent 6,701,344

**PATENT OWNER'S MOTION FOR ENTRY OF THE PROPOSED
STIPULATED PROTECTIVE ORDER AND TO SEAL CERTAIN
EXHIBITS UNDER 37 C.F.R. §§ 42.14 AND 42.54**

¹ Bungie, Inc., who filed a Petition in IPR2016-00934, has been joined as a petitioner in this proceeding.

Motion for Entry of the Proposed Stipulated Protective Order
IPR2015-01972 (U.S. Patent No. 6,701,344)

Pursuant to 37 C.F.R. §§ 42.14 and 42.54, and the Board’s Order entered December 12, 2016 (Paper 101), Patent Owner, Acceleration Bay, LLC, (“Acceleration Bay”) hereby moves for entry of the Proposed Stipulated Protective Order and to seal portions of its Patent Owner Response, Patent Owner’s Opposition to Petitioner’s Motion to Exclude, and certain Exhibits (collectively referred to herein as the “Subject Exhibits”) which are identified below:

Filing/Exhibit²	Content	Section	Confidential Information³
Paper 103	Patent Owner Response	Redacted portion on	Contains highly confidential

² Pursuant to the Board’s instructions, confidential and non-confidential versions of Patent Owner’s Response and the Subject Exhibits are concurrently filed herewith. With respect to Patent Owner’s Response, the confidential version is filed as Paper 31 and the non-confidential version is filed as Paper 103. With respect to Patent Owner’s Opposition to Petitioner Motion to Exclude, the confidential version is filed as Paper 85 and the non-confidential version is filed as Paper 104.

Furthermore, pursuant to the Board’s request, Patent Owner will concurrently notify the Board of the exhibits and papers for which it no longer seeks to maintain their confidentiality.

³ Further details regarding the confidential information regarding each of the filings and exhibits identified in this chart are explained *infra* at § I.

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Filing/Exhibit ²	Content	Section	Confidential Information ³
		Pages 5, 62	information regarding internal research and development efforts of a third party, including internal project codenames which the third party has deemed confidential information.
Exhibit 2023	Declaration of Dr. Harry Bims in Support of Patent Owner's Response with Appendix A (<i>Curriculum Vitae</i> of Dr. Harry Bims)	¶ 10	Contains highly confidential information regarding licensing practices of a third party, including names and licensing terms which the third party has deemed confidential information.
		¶ 32	Contains highly confidential information regarding internal research and development efforts of a third party, including internal project code names and project details which the third party has deemed confidential information.
Exhibit 2024	Declaration of Dr. Fred B. Holt in Support of Patent Owner's Response	¶¶ 5, 9, 18, 22, 26, 27	Contains highly confidential information regarding internal research and development efforts

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Filing/Exhibit ²	Content	Section	Confidential Information ³
			of a third party, including internal project code names and project details which the third party has deemed confidential information.
Exhibit 2025	Declaration of Virgil Bourassa in Support of Patent Owner's Response	¶¶ 2 – 4, 7, 8, 15 (Fig. 5), 24, 25, 27, 35, 36, 41, 42	Contains highly confidential information regarding internal research and development efforts of a third party, including internal project code names and project details which the third party has deemed confidential information.
Exhibit 2026	Declaration of Robert Abarbanel in Support of Patent Owner's Response	¶¶ 4–7, 9, 10	Contains highly confidential information regarding internal research and development efforts of a third party, including internal project code names and project details which the third party has deemed confidential information.
Exhibit 2028	Boeing Invention Disclosure Form (19 pages)	Pages 1-2, 5, 7-19	Contains highly confidential information regarding internal research and

Filing/Exhibit ²	Content	Section	Confidential Information ³
			development efforts of a third party, including internal project codenames and project details which the third party has deemed confidential information.
		Pages 1-19	Contains highly confidential information regarding personal information of a third party.
		Page 1	Contains highly confidential information regarding business information of a third party, including identification of the third party's potential and existing business relationships which the third party has deemed confidential information.
Exhibit 2029	Patent License Agreement between Boeing Management Company and Sony Computer Entertainment America Inc.	Pages 1, 4, 5	Contains highly confidential information regarding licensing practices of a third party, including names and licensing terms which the third party has deemed confidential information.

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