

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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MICROSOFT CORPORATION,  
Petitioner

v.

BRADIUM TECHNOLOGIES LLC,  
Patent Owner

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CASE IPR2016-00449  
Patent 8,924,506 B2

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**PATENT OWNER'S UNOPPOSED MOTION TO SEAL  
PURSUANT TO 37 C.F.R. § 42.14**

Pursuant to 37 C.F.R. §§ 42.14 and 42.54 Patent Owner Bradium Technologies LLC (“Patent Owner”) respectfully requests that the Board seal portions of Patent Owner’s Reply in Support of Patent Owner’s Motion to Exclude and Exhibit 2082, a November 23, 2016 Letter to Isaac Levanon of 3-D-V-U Israel (2000) Ltd. (“3DVU Israel”) from DENSO Corp.

The Parties have conferred regarding this motion and Petitioner Microsoft Corporation does not oppose the Motion.

#### **I. PATENT OWNER’S MOTION TO SEAL**

The Office Patent Trial Practice Guide provides that “the rules aim to strike a balance between the public’s interest in maintaining a complete and understandable file history and the parties’ interest in protecting truly sensitive information.” 77 Fed. Reg. 48,756, 48,760 (Aug. 14, 2012). Those rules “identify confidential information in a manner consistent with Federal Rule of Civil Procedure 26(c)(1)(G), which provides for protective orders for trade secret or other confidential research, development, or commercial information.” *Id.* (citing 37 C.F.R. § 42.54).

Patent Owner Bradium has good cause to seal portions of its Reply to Petitioner’s Opposition to Patent Owner’s Motion to Exclude because the portions in question reference material for which 3-D-V-U Israel (2000) Ltd. is under a confidentiality obligation pursuant to Exhibit 2029. As explained in Bradium’s

November 11, 2016 Motion to Seal (Paper 15), Exhibit 2029 is a confidential License Agreement signed by Mr. Isaac Levanon. The agreement imposes a confidentiality requirement. Exhibit 2029 at 7 (Section 11). DENSO Corporation has requested that Patent Owner Bradium maintain Exhibit 2029 as confidential pursuant to a protective order.

Exhibit 2082 is a confidential letter from DENSO to 3-D-V-U Israel (2000) Ltd. that relates to information for which 3-D-V-U Israel (2000) Ltd. and Bradium are under a confidentiality obligation pursuant to Exhibit 2029.

In accordance with the Protective Order (Paper 15, Exhibit A) § 4(A)(ii), the non-confidential version of the Patent Owner's Reply to Petitioner's Opposition to Patent Owner's Motion to Exclude is concurrently being filed by Patent Owner with confidential information redacted.

## **II. CONCLUSION**

For the foregoing reasons, Patent Owner respectfully requests that the Board seal the portions of Patent Owner's Reply in Support of Patent Owner's Motion to Exclude and Exhibit 2082.

Dated: April 7, 2017

/s/ Chris J. Coulson

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## CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6(e), the undersigned certifies that on April 7, 2017, the foregoing *Patent Owner's Motion to Seal* is being served via electronic mail upon the following counsel of record for Petitioner:

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/s/ Chris J. Coulson

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