

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

BAKER HUGHES, A GE COMPANY, LLC
and
BAKER HUGHES OILFIELD OPERATIONS LLC
Petitioners

v.

PACKERS PLUS ENERGY SERVICES, INC.
Patent Owner

Case IPR2016-01496
Patent 7,134,505

PETITIONERS' MOTION TO SEAL

Petitioners move to:

- seal Exhibit 1130 that was filed under seal as “Board and Parties Only” and designated as “Protective Order Material” pursuant to the Agreed Proposed Protective Order (Paper 54).
- redact certain testimony from Ex. 1132, Transcript of Harold E. McGowen III’s July 27, 2017 Deposition that was filed under seal as “Board and Parties Only.”

Exhibit 1130 contains Petitioners’ proprietary financial data regarding sales of certain of its sleeves and packers, which is sensitive and confidential commercial information for which the seal should be maintained.

The testimony redacted in Exhibit 1132, in addition to having been contemporaneously designated by Petitioners’ counsel as “subject to the protective order” (Transcript at 134:25-135:1) pursuant to the Agreed Proposed Protective Order, is based on and contains Petitioners’ highly-sensitive commercial information that was produced by Petitioners during litigation subject to a district court protective order, for which the seal should be maintained. Two versions of the Transcript have been filed: (1) a confidential, unredacted version (Ex. 1132), which Petitioners request be sealed in its entirety; and (2) a non-confidential, redacted version (Ex. 1133), for which Petitioners request that the redacted

testimony remain redacted. The redacted testimony can be found on page 134,
from line 18 through line 24.

Dated: August 17, 2017

Respectfully submitted,

/Mark T. Garrett/

Mark T. Garrett, *Lead Counsel*

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Counsel for Petitioners

CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6(e), the undersigned certifies that on August 17, 2017, a copy of this PETITIONERS' MOTION TO SEAL was served on Lead and Backup Counsel for Patent Owner via e-mail (by consent) to:

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