

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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RUBICON COMMUNICATIONS, LP  
Petitioner,

v.

LEGO A/S  
Patent Owner.

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Case IPR2016-01187  
Patent 8,894,066

**MOTION TO SEAL CERTAIN PORTIONS OF PATENT  
OWNER'S OPPOSITION TO PETITIONER'S MOTION TO LIST  
ADDITIONAL PARTIES AS REAL PARTIES-IN-INTEREST**

## **I. STATEMENT OF RELIEF REQUESTED**

Pursuant to 37 C.F.R. § 42.14, LEGO A/S (the "Patent Owner") respectfully requests the Board seal certain portions of Patent Owner's Opposition to Petitioner's Motion to List Additional Parties as Real Parties-in-Interest ("Opposition").

## **II. STATEMENT OF REASONS FOR THE RELIEF REQUESTED**

Patent Owner respectfully requests the Board seal certain portions of the Opposition and concurrently submits a redacted, non-confidential version for the public. Patent Owner believes seeking the Board's prior authorization to file this Motion would be impractical and, as a result, submits this Motion without the Board's authorization. *See* Office Patent Trial Practice Guide, 77 Fed. Reg. 48,755, 48,762 (Aug. 14, 2012) ("Motions where it is not practical to seek prior Board authorization include motions to seal . . .").

Petitioner has informed Patent Owner that parts of the Opposition, which relies on the transcript of James Thompson deposition, contain confidential information and business strategy. *See* Paper 52. Accordingly, Patent Owner respectfully requests certain redacted portions to remain sealed under the Board's default protective order, or alternatively, Petitioner's proposed protective order. Ex. 1035.

### III. CONCLUSION

For the foregoing reason, Patent Owner respectfully requests that the unredacted version of the Opposition be sealed from the public.

Respectfully submitted,

Dated: March 10, 2016

/ Elizabeth A. Alquist/

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**CERTIFICATE OF SERVICE**

Pursuant to 37 C.F.R. § 42.6(e), the undersigned certifies that on March 10, 2017, a true and correct copy of the foregoing Motion, via UPS Overnight, was served on the following counsel of record:

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