

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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WEATHERFORD INTERNATIONAL, LLC;  
WEATHERFORD/LAMB, INC.; WEATHERFORD US, LP; and  
WEATHERFORD ARTIFICIAL LIFT SYSTEMS, LLC  
Petitioners

v.

PACKERS PLUS ENERGY SERVICES, INC.,  
Patent Owner

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Case IPR2016-01509  
Patent 7,861,774

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**MOTION TO SEAL AND FOR  
ENTRY OF DEFAULT PROTECTIVE ORDER**

Pursuant to 37 C.F.R. §§ 42.14 and 42.54, Petitioners, by and through its counsel of record, move to seal Exhibit 1029 that accompanies Petitioner's Reply to the Patent Owner's Preliminary Response. Petitioner further requests that the Board enter the Default Protective Order submitted herewith as Exhibit 1031. *See also*, Office Trial Practice Guide, Appendix B, pp. 48769-71.

### **I. GOOD CAUSE EXISTS TO SEAL PETITIONER'S EXHIBIT 1029**

Good cause exists for entering a document under seal if it constitutes confidential information of Petitioner as well as entities that are not parties to the subject proceeding. *See, e.g., First Quality Baby Produces, LLC v. Kimberly-Clark Worldwide, Inc.*, IPR2014-01021, paper 42 at 11. Exhibit 1029 constitutes confidential information of Petitioner as well as co-defendants in a litigation involving the patents-at-issue in the present IPR proceeding, but who are not parties to the present IPR proceeding. Accordingly, good cause exists to enter Exhibit 1029 under seal.

### **II. CERTIFICATION OF CONFERENCING WITH OPPOSING PARTY PURSUANT TO 37 C.F.R. § 42.54**

Petitioner certifies that it has conferred with Patent Owner, and the parties have agreed to the terms of the Default Protective Order.

### **III. DEFAULT PROTECTIVE ORDER**

Petitioner respectfully requests entry of the Default Protective Order as set

forth in the Office Trial Practice Guide, Appendix B, pp. 48769-71, a copy of which is submitted herewith as Exhibit 1031.

#### **IV. CONCLUSION**

For the foregoing reasons, Petitioner respectfully requests that the Board enter the Default Protective Order and further requests that Exhibit 1029 be entered under seal as confidential material under the Default Protective Order.

Dated: December 19, 2016

Respectfully submitted,

/Jason Shapiro/

Jason Shapiro, *Counsel for Petitioners*