

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.

PROXYCONN, INC.,  
Patent Owner

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Case IPR2017-00261  
Patent 6,757,717 B1

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**PETITIONER MICROSOFT'S UNOPPOSED  
MOTION TO FILE PRELIMINARY REPLY UNDER SEAL**

Pursuant to 37 CFR 42.54, Petitioner Microsoft Corporation (“Microsoft”) respectfully moves to file under seal Paper 10, Reply of Petitioner Microsoft to the Time Bar Arguments in the Patent Owner Preliminary Response. A public, redacted version of the Reply is being filed concurrently as Paper 11. Patent Owner does not oppose this motion to file under seal.

Good cause exists for sealing the portions of Paper 10 redacted from Paper 11. Those redacted portions recite terms of Exhibit 2005, a private agreement signed by Microsoft, Patent Owner Proxyconn, and third parties. That agreement obligates its parties to maintain the terms of the agreement as confidential, with possible legal consequences for failure to do so. (*See* Ex. 2005, ¶¶ 14-15.)

In addition, the public’s interest in having access to the redacted information is minimal, if any. While the precise terms of the private agreement are redacted from Paper 11, Paper 11 explains the intent and the legal effects of the agreement in sufficient detail for the interested members of the public to understand the arguments made in the Reply Brief.

In sum, good cause exists to seal the redacted information, so that Petitioner may comply with its contractual obligations to Patent Owner and third parties.

Petitioner certifies that it has conferred with Neil Rubin, Patent Owner’s counsel of record, who indicated on March 17, 2017, that Patent Owner does not oppose this Motion to Seal.

Petitioner proposes entry of the default protective order found in Appendix B of the Office Patent Trial Practice Guide, 77 Fed. Reg. 48,756, 48,771 (Aug. 14, 2012), also attached as Appendix A to this motion.

Dated: March 25, 2017

Respectfully submitted,

/John D. Vandenberg/

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**CERTIFICATE OF SERVICE PURSUANT TO 37 C.F.R. § 42.6(e)(4)**

The undersigned certifies that a complete copy of Microsoft Corporation's Unopposed Motion To File Reply Brief Under Seal was served on March 25, 2017, by filing this document through the Patent Review Processing System as well as delivering a copy via electronic mail upon the following attorneys of record for the

Patent Owner:

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# APPENDIX A

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