

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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SAMSUNG ELECTRONICS CO., LTD.; AND  
SAMSUNG ELECTRONICS AMERICA, INC.  
Petitioner

v.

IMAGE PROCESSING TECHNOLOGIES, LLC  
Patent Owner

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Case IPR2017-01190  
Patent No. 6,717,518

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**REVISED UNOPPOSED MOTION TO SEAL**

This Revised Unopposed Motion to Seal replaces prior filed motion Paper No. 7, which is hereby withdrawn. The present Motion was authorized by the Board via email sent September 10, 2018 at 2:49 PM EDT. In that email, the Board also authorized the filing of a public redacted version of Exhibit 1012, which is filed concurrently herewith. The confidential unredacted version of Exhibit 1012 was previously lodged with the Board.

Petitioner moves to seal Exhibit 1012, which is an excerpt from Patent Owner's infringement expert report filed in a parallel district court proceeding. Exhibit 1012 discusses the operation of Petitioner's highly confidential, nonpublic source code in Petitioner's products, which are accused of infringing U.S. Patent No. 6,717,518 in the related district court proceeding. It discloses function names, file names, and descriptions of Samsung's highly confidential source code, the public disclosure of which would cause irreparable harm.

Exhibit 1012 also includes expert opinion, photographs, and figures created by Patent Owner that are *not* confidential. Only non-confidential portions of Exhibit 1012 authored by Patent Owner were disclosed in Petitioner's public filings, *i.e.*, Paper 19, Reply at 11 and Ex. 1020, Demonstratives at 23. None of the previously disclosed material is redacted in the public redacted version of Exhibit 1012.

**NOTICE OF CONSENT TO ENTRY OF THE  
DEFAULT PROTECTIVE ORDER**

Petitioner consents to entry of the Default Protective Order. The undersigned certifies that Petitioner met and conferred with Patent Owner and that (1) Patent Owner does not oppose this motion and (2) Patent Owner does not oppose entry of the Default Protective Order.

Dated: September 17, 2018

By: /s/ Nicholas Whilt  
Nicholas Whilt (Reg. No. 72,081)

**CERTIFICATE OF SERVICE**

The undersigned certifies pursuant to 37 C.F.R. § 42.6(e) and § 42.105 that on September 17, 2018, a true and correct copy of Petitioner's **Revised Unopposed Motion to Seal** was served via electronic mail upon the following counsel of record for Patent Owner:

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Respectfully submitted,

/s/ Nicholas J. Whilt

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