

UNITED STATES PATENT AND TRADEMARK OFFICE

---

BEFORE THE PATENT TRIAL AND APPEAL BOARD

---

PFIZER, INC. and  
SAMSUNG BIOEPIS CO., LTD.,<sup>1</sup>  
Petitioners,

v.

GENENTECH, INC.,  
Patent Owner.

---

Case IPR2017-01488  
Patent 6,407,213

---

**PETITIONERS' MOTION TO SEAL**

---

<sup>1</sup> Samsung Bioepis Co., Ltd.'s IPR2017-02139 has been joined with this proceeding. (IPR2017-02139, Paper 42.)

Pursuant to 37 C.F.R. §§ 42.14 and 42.54, Petitioners respectfully move to seal portions of Petitioners' Motion to Exclude filed today. This document contains references to subject matter filed under seal by Patent Owner, Genentech, Inc.

Patent Owner filed a Motion to Seal (Paper 8) its Patent Owner Preliminary Response and other materials along with a Modified Default Standing Protective Order (Ex. 2030) on September 5, 2017. The Board entered the protective order and granted Patent Owner's Motion to Seal on November 15, 2017. Paper 25 at 3.

The parties have previously conferred and agreed to the provisions of the Modified Default Standing Protective Order, and have stipulated to be bound by the terms set forth therein. Paper 8 at 2–3.

Along with this Motion, Petitioner files today a redacted version of the Motion to Seal, indicating the sections that reference the confidential material.

Date: June 22, 2018

Respectfully submitted,

/Amanda Hollis/

Amanda Hollis (Reg. No. 55,629)

*Attorney For Petitioner Pfizer, Inc.*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing Motion to Seal was served on June 22, 2018, via electronic service on lead and back-up counsel:

**For Genentech, Inc.**

david.cavanaugh@wilmerhale.com

lauren.blakely@wilmerhale.com

robert.gunther@wilmerhale.com

abrausa@durietangri.com

ddurie@durietangri.com

andrew.danford@wilmerhale.com

kevin.prussia@wilmerhale.com

lisa.pirozzolo@wilmerhale.com

**For Samsung Bioepis Co., Ltd.:**

ddrivas@whitecase.com

sweingaertner@whitecase.com

eric.majchrzak@whitecase.com

athakore@whitecase.com

*/Amanda Hollis/*  
Amanda Hollis