

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

BUNGIE, INC.,
Petitioner,

v.

ACCELERATION BAY, LLC,
Patent Owner.

Case IPR2017-01600
Patent 6,910,069

**PATENT OWNER'S MOTION FOR ENTRY OF THE PROPOSED
STIPULATED PROTECTIVE ORDER AND TO SEAL CERTAIN
EXHIBITS UNDER 37 C.F.R. §§ 42.14 AND 42.54**

Motion for Entry of the Proposed Stipulated Protective Order
IPR2017-01600 (U.S. Patent No. 6,910,069)

Pursuant to 37 C.F.R. §§ 42.14 and 42.54, Patent Owner Acceleration Bay, LLC, (“Acceleration Bay”) hereby moves for entry of the Proposed Stipulated Protective Order and to seal portions of its Patent Owner Preliminary Response and certain Exhibits (collectively referred to herein as the “Subject Exhibits”) which are identified below:

Filing/Exhibit¹	Content	Section	Confidential Information²
Paper 6	Patent Owner Preliminary Response	Redacted portion on pages 4, 17, 19-26	Contains highly confidential information regarding internal research and development efforts of a third party, including internal project codenames which the third party has deemed confidential information.

¹ Non-confidential, redacted versions of Patent Owner’s Preliminary Response and the Subject Exhibits are concurrently filed herewith.

² Further details regarding the confidential information regarding each of the filings and exhibits identified in this chart are explained *infra* at § I.

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Filing/Exhibit ¹	Content	Section	Confidential Information ²
Exhibit 2004	Email from counsel for Bungie	Entirety	Contains highly confidential information regarding internal research and development efforts of a third party, which the third party has deemed confidential information.
Exhibit 2005	Email from counsel for Bungie	Entirety	Contains highly confidential information regarding internal research and development efforts of a third party, which the third party has deemed confidential information.
Exhibit 2006	Declaration of Dr. Fred B. Holt in Support of Patent Owner's Response (IPR2015-01951)	¶¶ 5, 9, 18, 22, 26, 27	Contains highly confidential information regarding internal research and development efforts of a third party, including internal project code names and project details which the third party has deemed confidential information.

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Filing/Exhibit ¹	Content	Section	Confidential Information ²
Exhibit 2007	Declaration of Virgil Bourassa in Support of Patent Owner's Response (IPR2015-01951)	¶¶ 2 – 4, 7, 8, 15, 24, 25, 27, 35, 36, 41, 42	Contains highly confidential information regarding internal research and development efforts of a third party, including internal project code names and project details which the third party has deemed confidential information.
Exhibit 2008	Declaration of Robert Abarbanel in Support of Patent Owner's Response (IPR2015-01951)	¶¶ 4–7, 9, 10	Contains highly confidential information regarding internal research and development efforts of a third party, including internal project code names and project details which the third party has deemed confidential information.

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Filing/Exhibit ¹	Content	Section	Confidential Information ²
Exhibit 2009	Declaration of Scott Smith in Support of Patent Owner's Response (IPR2015-01951)	¶¶ 3-5	Contains highly confidential information regarding internal research and development efforts of a third party, including internal project code names and project details which the third party has deemed confidential information.
Exhibit 2010	Boeing Invention Disclosure Form (19 pages)	Pages 1-2, 5, 7-19	Contains highly confidential information regarding internal research and development efforts of a third party, including internal project code names and project details which the third party has deemed confidential information.
		Pages 1-19	Contains highly confidential information regarding personal information of a third party.

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