

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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UNIFIED PATENTS INC.  
Petitioner

v.

UNIVERSAL SECURE REGISTRY LLC  
Patent Owner

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IPR2018-00067  
Patent 8,577,813

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**PETITIONER'S UNOPPOSED MOTION TO SEAL**

## **I. RELIEF REQUESTED**

On August 21, 2018, the parties filed a “Joint Motion for Protective Order,” as authorized by the Board. Paper 24. The Protective Order was filed as Exhibit 2002.

Petitioner is filing its Reply to Patent Owner’s Response, which includes the Declaration of Kevin Jakel filed as Exhibit 1036 and Deposition Transcript of Kevin Jakel filed as Exhibit 1037, both which Petitioner designates HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY under the Protective Order. Specifically, the Petitioner contends that these documents contain highly confidential and sensitive business information regarding Petitioner’s internal business operations, financial information, membership information, and other sensitive business information that could cause competitive business injury to or potential breach of contractual obligations by Petitioner if publicly disseminated.

Section 8 of the Protective Order instructs the Petitioner “shall file confidential and non-confidential versions of its submissions, together with a Motion to Seal.” Exhibit 2002 at 6-7. Accordingly, Petitioner has prepared a non-confidential version of its Reply that redacts certain discussion of certain confidential information from Exhibits 1036 and 1037, and Petitioner now

respectfully moves to seal Exhibits 1036, Exhibit 1037, and the confidential version of Petitioner's Reply brief.

Petitioner states that it has conferred with counsel for Patent Owner, who indicated that Patent Owner does not oppose this Motion.

## II. CONCLUSION

For the foregoing reasons, Petitioner respectfully requests that the Board grant Petitioner's Unopposed Motion to Seal.

Respectfully submitted,

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*ATTORNEYS FOR PETITIONER*

### CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6(e), the undersigned certifies that on November 21, 2018, Petitioner's Motion to Seal was served via electronic service on the following counsel of record for Patent Owner:

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Dated: November 21, 2018

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