

UNITED STATES PATENT AND TRADEMARK OFFICE

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GOOGLE LLC, ZTE (USA), INC., SAMSUNG ELECTRONICS CO., LTD.,  
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HUAWEI INVESTMENT & HOLDING CO. LTD.,  
HUAWEI TECH. INVESTMENT CO. LTD., and  
HUAWEI DEVICE (HONG KONG) CO. LTD.,  
Petitioner

v.

CYWEE GROUP LTD.  
Patent Owner

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Case IPR2018-01257  
Patent No. 8,552,978

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**PATENT OWNER'S MOTION TO SEAL EXHIBIT 2034  
AND EXHIBIT 1043**

**LIST OF EXHIBITS**

2001	Declaration of Dr. Gary L. Blank [WITHDRAWN]
2002	<i>Curriculum Vitae</i> of Dr. Gary L. Blank CV [WITHDRAWN]
2003	Claim Construction Opinion and Order (Doc. 117), <i>Cywee Group Ltd. v. Samsung Elecs. Co., Ltd.</i> , C.A. No. 2:17-CV-00140-WCB-RSP (E.D. Tex., July 9, 2018)
2004	Expert Declaration of Dr. Joseph LaViola, Ph.D., in Support of Patent Owner Response
2005	<i>Curriculum Vitae</i> of Dr. Joseph LaViola, Ph.D.
2006	Order (Doc. 153), <i>Cywee Group Ltd. v. Samsung Elecs. Co., Ltd.</i> , C.A. No. 2:17-CV-00140-WCB-RSP (E.D. Tex., Aug. 14, 2018)
2007	Memorandum Opinion (Doc. 55), <i>CyWee Group Ltd. v. Motorola Mobility LLC</i> , C.A. No. 17-780-RGA (D. Del., Dec. 21, 2018)
2008	File History of U.S. Application No. 10/396,439
2009	File History of U.S. Application No. 12/413,722
2010	File History of U.S. Application No. 13/367,058
2011	Expert Declaration of Dr. Joseph LaViola, Ph.D., in Support of Motion to Amend
2012	File History of U.S. Provisional Application 61/292,558
2013	Google's Responses to CyWee's Requests for Production, <i>CyWee Group Ltd. v. Google, Inc.</i> , No. 1:18-cv-00571 (D. Del.) (Sep. 4, 2018)

2014	Google/Samsung 2011-2012 Mobile Application Distribution Agreement (Android)
2015	<i>CyWee Group, Ltd. v. Samsung Elecs. Co. Ltd.</i> , C.A. No. 2:17-CV-00140-WCB-RSP, Doc. 1-1 (Exhibit A, Infringement Claim Chart)
2016	Web Print-Out “ <i>Introducing PAX: the Android Networked Cross-License Agreement</i> ,” available at <a href="https://blog.google/outreach-initiatives/public-policy/introducing-pax-android-networked-cross-license-agreement/">https://blog.google/outreach-initiatives/public-policy/introducing-pax-android-networked-cross-license-agreement/</a>
2017	List of IPR Petitions Filed against Seven Networks, LLC
2018	Demonstrative: Relationship of Android Defendants
2019	Transcript of Call Authorizing Patent Owner to File Motion to Terminate (July 8, 2019)
2020	Declaration of Shun-nan Liou
2021	CyWee, Where Technology Entertains 2009.09
2022	JIL Game System Hardware Specification Ver. 1.5
2023	JIL Phone Bill of Materials (May 24, 2010)
2024	Photographs of JIL Phone Prototype
2025	CyWee Phone API Reference
2026	CyWee Motion Fusion Solution
2027	CyWee Where technology entertains Technical Presentation: Motion Technology and Gaming Applications

2028	July 29, 2009 email to James Shen, Qualcomm
2029	Attachment to July 29, 2009 email to James Shen, Qualcomm
2030	CyWee/Qualcomm Mutual NDA (April 23, 2008)
2031	Attitude.cpp file (last modified February 12, 2010)
2032	Expert Declaration of Dr. Joseph LaViola, Ph.D., in Support of Patent Owner's Reply in Support of Motion to Amend
2033	Transcript of Deposition of Prof. Majid Sarrafzadeh (July 24, 2019)
2034	Attitude.cpp file, with Line Numbers (last modified February 12, 2010)

Pursuant to 37 C.F.R. § 42.14 and the Board's Scheduling Order (Paper 9), Patent Owner respectfully requests that Exhibit 2034, which by agreement of the parties shall be another version of Exhibit 2031 submitted with Patent Owner's Reply In Support of Motion to Amend, be sealed and not made available to the public. Exhibit 2031 is source code and was previously filed under seal by Patent Owner. Exhibit 2034 is substantively identical to Exhibit 2031 but contains line numbers for ease of readability. Like Exhibit 2031, Exhibit 2034 contains valuable and sensitive commercial information of Patent Owner that is not available to the public. The same document is subject to the Protective Order entered in the related district court action. Exhibit 2034 was entered as an exhibit in the August 13, 2019, deposition of Dr. Joseph LaViola and Petitioner does not object to Patent Owner's filing of and reliance on Exhibit 2034.

Petitioner has informed Patent Owner that it will file the August 13, 2019, deposition transcript of Dr. Joseph LaViola as Exhibit 1043 to be submitted with its Sur-Reply to Patent Owner's Motion to Amend. Petitioner has informed Patent Owner that it will file a redacted version of that deposition transcript available to the public as Exhibit 1048 to its same Sur-Reply. Petitioner has requested that Patent Owner file a Motion to Seal for Exhibit 1043. Patent Owner therefore respectfully requests that Exhibit 1043 be sealed and not made available to the public. Exhibit 1043 contains valuable and sensitive commercial information of

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