

UNITED STATES PATENT AND TRADEMARK OFFICE

---

BEFORE THE PATENT TRIAL AND APPEAL BOARD

---

UNIFIED PATENTS INC.,  
Petitioner

v.

SYNKLOUD TECHNOLOGIES, LLC,  
Patent Owner

---

Case No. IPR 2019-01655

Patent No. 9,098,526

---

**PATENT OWNER'S UNOPPOSED MOTION TO SEAL**

**37 C.F.R. §§ 42.54, 42.55**

Supplementing Patent Owner's Motion to Seal filed June 12, 2020, Patent Owner reports that the parties engaged in earnest and concrete discussions and have agreed on a modified protective order to which no party has objection. The Modified Protective Order, submitted herewith as Exhibit 2013, provides for somewhat more limited access to the confidential material submitted than the Board's Standing Order, but grants access to those most fundamentally involved. The departures from the Standard Protective Order are confined to Sections A through D of Section 2 of the Standard Protective Order.

For the benefit of clarity, a "redline" version of the Modified Protective Order is submitted herewith as Exhibit 2014. Based on the revisions made to the Modified Protective Order submitted herewith, Patent Owner is confident that the confidentiality of the Confidential Information submitted with Patent Owner's Response will be protected. Undersigned counsel wishes to express his appreciation to counsel for Petitioners for being open to discussion and responsive to arrive at a suitable Modified Protective Order that will allow the Confidential Information to be considered.

Accordingly, grant of this unopposed motion, and consideration of the Confidential Information previously submitted, under seal, pursuant to the Modified Protective Order submitted herewith, is respectfully requested.

Respectfully submitted,

Date: June 24, 2020

/s/ Steven B. Kelber  
Steven B. Kelber  
Yeasun Yoon  
Capitol IP Law. PLLC

E-Mail:  
Steve. Kelber@capitoliplaw.com  
[yeasun@capitoliplaw.com](mailto:yeasun@capitoliplaw.com)  
Tel: (240)506-6702  
Tel: (434)906-2975

Attorneys for Patent Owner

I certify that a copy of the foregoing Patent Owner's Unopposed Motion to Seal and Exhibits referred to therein were served on counsel for Petitioners, via email on June 24, 2020, electronic service having been previously agreed upon.

/s/ Steven B. Kelber