IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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NINTENDO CO., LTD., and NINTENDO OF AMERICA INC.,
Petitioners,

v.

ANCORA TECHNOLOGIES, INC.,
Patent Owner.

_____

Case IPR2021-01338
U.S. Patent No. 6,411,941 B1

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PATENT OWNER'S UNOPPOSED MOTION TO FILE ITS OPENING BRIEF ON REMAND UNDER SEAL PURSUANT TO 37 C.F.R. §§ 42.14 AND 42.54

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Patent Trial and Appeal Board
U.S. Patent and Trademark Office
P.O. Box 1450
Alexandria, VA 22313-1450

Pursuant to 37 C.F.R. §§ 42.14 and 42.54, Patent Owner Ancora Technologies, Inc. ("Ancora") respectfully submits this Patent Owner's Motion to Seal Its Opening Brief on Remand ("Opening Brief") filed concurrently with this Motion. Ancora is also concurrently filing a redacted version of its Opening Brief. Petitioners do not oppose this motion.

Pursuant to the Trial Practice Guide July 2019 Update, "[t]he terms of a protective order take effect upon the filing of a Motion to Seal by a party, and remain in place until lifted or modified by the Board either on the motion of a party for good cause shown or sua sponte by the Board." (Appendix B, § (b).) Accordingly, Ancora understands that the protective order (Ex. 2038) proposed by the parties will take effect upon filing of this Motion.

I. Background

Evidence in this case relates to licensing history for the patent at issue in this IPR and is relied upon as part of the objective evidence of non-obviousness. Ancora's Opening Brief incorporates some of this information, which includes third party confidential information that the third parties wish to remain confidential.

II. Good Cause Exists for Sealing Ancora's Opening Brief

Ancora submits that its Opening Brief incorporates confidential business information, the disclosure of which is likely to significantly harm one or more third

party's competitive position, or the disclosure of which would contravene an obligation of confidentiality.

Respectfully submitted,

FITCH, EVEN, TABIN & FLANNERY LLP

Dated: August 29, 2025

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CERTIFICATE OF SERVICE

The undersigned certifies in accordance with 37 C.F.R. § 42.6(e) that on August 29, 2025, a copy of the foregoing **PATENT OWNER'S UNOPPOSED MOTION TO FILE ITS OPENING BRIEF ON REMAND UNDER SEAL PURSUANT TO 37 C.F.R. §§ 42.14 AND 42.54**, was served via electronic mail to the attorneys listed below at PerkinsService-Nintendo-Ancora-IPR@perkinscoie.com:

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