
UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

ZF NORTH AMERICA, INC., ZF ACTIVE SAFETY US INC.,
Petitioners,

v.

STONERIDGE CONTROL DEVICES, INC.,
Patent Owner.

Inter Partes Review No. IPR2023-00273
Patent No. 7,021,415

PATENT OWNER'S MOTION TO SEAL EXHIBIT 2012

Patent Owner submits this Motion to Seal Ex. 2012, and attaches the Board's default protective order as Ex. 2020. The Parties have conferred on the use of the Board's default protective order. Specifically, Patent Owner proposed using the Board's default protective order in this proceeding, and Petitioners do not object to its use.

Patent Owner seeks to seal Ex. 2012 because each page (except the cover page) contains a confidentiality notice stating, "[t]he information appearing in this document is the property of Stoneridge Corporation and is disclosed in confidence. It is not to be copied, reproduced, revealed to or appropriated by others, either in whole or in part, without the expressed written consent of Stoneridge." Moreover, Ex. 2012 contains commercially sensitive information, including internal designs, proposals, and test results of Patent Owner (and/or its affiliates).

Allowing the public to see Ex. 2012 would prejudice Patent Owner from a business standpoint, as it would allow Patent Owner's competitors and customers to gain access to sensitive and confidential information that Patent Owner represented should remain private.

Maintaining the confidentiality of Patent Owner's commercially sensitive information, including internal designs, proposals, and test results outweighs the public's interest in disclosure of the same.

For at least the reasons set forth above, Patent Owner respectfully requests that the Board grant this motion to seal Ex. 2012 and enter its default protective (Ex. 2020).

Respectfully Submitted,

CARLSON, GASKEY & OLDS, P.C.

/Timothy J. Murphy/
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CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the foregoing document was served electronically via email in its entirety on the following:

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Petitioners have consented to electronic service.

Respectfully Submitted,

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