

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

BOX, INC., and DROPBOX, INC.,

Petitioners

v.

TOPIA TECHNOLOGY, INC.,

Patent Owner

Case IPR2023-00427

Patent 9,143,561

PATENT OWNER'S UNOPPOSED MOTION TO SEAL

Patent Owner, Topia Technology, Inc., hereby moves to seal its Request for Director Review of Institution Decision pursuant to 37 C.F.R. § 42.54 and the Director's email of August 24, 2023, and subject to the proposed Protective Order submitted by Petitioners as Exhibit A to Paper No. 9 (Petitioners' Unopposed Motion to Seal And For Entry of Agreed Protective Order).

Good cause exists to seal the unredacted version of the Patent Owner's Request for Director Review of Institution Decision because it contains highly confidential business information of Petitioners, highly confidential information on the Joint Defense and Information Sharing Agreement (Ex. 1030) of which Petitioners are parties to, and highly confidential information contained in the Declaration (Ex. 1029) and Deposition of Heidi Keefe (Ex. 2018).

Patent Owner has conferred with Petitioners and confirmed that Petitioners do not oppose this motion.

Accordingly, Patent Owner respectfully requests that the Board maintain under seal and protect Petitioner's confidential information in the unredacted versions of Its Request for Director Review of Institution Decision.

Patent Owner concurrently herewith submits a redacted version of the Request for Director Review of Institution Decision to be made public.

Date: August 29, 2023

Respectfully submitted,

/ Raja Saliba/

Raja N. Saliba (Reg. No. 43,078)

Chidambaram S. Iyer (Reg. No. 43,355)

Michael R. Dzwonczyk (Reg. No. 36,787)

L. Roman Rachuba (Reg. No. 75,180)

Sughrue Mion, PLLC

Telephone: (202) 293-7060

Facsimile: (202) 293-7860

CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the attached Patent Owner's Unopposed Motion to Seal is being served by electronic mail on the following counsel of record:

Heidi L. Keefe
Reuben H. Chen
Lowell D. Mead
Samuel K. Whitt
Cooley LLP
1299 Pennsylvania Ave NW Suite 700
Washington, DC 200004
hkeefe@cooley.com
rchen@cooley.com
lmead@cooley.com
swhitt@cooley.com

/Soo Jin Hur/
Soo Jin Hur

Date: August 29, 2023