

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

VANTAGE SPECIALTY CHEMICALS, INC.,
Petitioner,

v.

CARGILL, INC.,
Patent Owner.

Case IPR2023-00589
Patent 11,248,245

PATENT OWNER'S UNOPPOSED MOTION TO SEAL

Pursuant to 37 C.F.R. §§ 42.14 and 42.54, Patent Owner Cargill, Inc. respectfully requests the Board to authorize the filing under seal of certain filings in this case, including the Patent Owner's Response filed concurrently herewith. The parties have met and conferred on this Motion, and Petitioner does not oppose.

Patent Owner requests that the Proposed Protective Order govern the materials in this proceeding. Good cause exists to deviate from the Default Protective Order.

Good cause exists to seal the Patent Owner's Response. Public disclosure of the Patent Owner's Response has the potential to significantly harm both Patent Owner and Petitioner's competitive positions because it would allow competitors to access highly sensitive information regarding research & development, manufacturing processes, and process information. For these reasons, Patent Owner has designated the Confidential Materials as "Protective Order Material" under the Proposed Protective Order.

Undersigned counsel, on behalf of Patent Owner, certifies that the information sought to be sealed has not, to their knowledge, been published or otherwise made public by Patent Owner.

Respectfully submitted,

Date: December 6, 2023

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CERTIFICATE OF SERVICE

Pursuant to 37 CFR § 42.6(e), the undersigned certifies that on December 6, 2023, a complete and entire copy of this Patent Owner's Unopposed Motion to Seal were provided via email, to the Petitioner by serving the correspondence addresses of record as follows:

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