

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

Duration Media LLC
Petitioner,

v.

Rich Media Club LLC
Patent Owner.

Case IPR2023-00953
U.S. Patent 11,443,329

PATENT OWNER'S MOTION TO SEAL

I. Introduction

Pursuant to 37 C.F.R. §42.54 and the parties’ agreed-upon protective order in this matter (Paper 28), Patent Owner Rich Media Club LLC (“RMC”) requests that Exhibit 1020, Exhibit 1022, and Patent Owner’s Demonstrative Exhibit Paper 66 be kept under seal. RMC is moving to seal its confidential revenue information. Duration does not oppose the motion.

II. Good Cause Exists for Sealing Certain Confidential Information.

Good cause exists for maintaining the confidentiality of these portions of the record. Exhibits 1020 and 1022 to the extent they contain Patent Owners confidential revenue information should be kept under seal. Paper 66 contains confidential information from both the Patent Owner and Petitioner should be kept under seal.

Toward that end, the parties have agreed to the default protective order (Paper 28) and based on the PTAB’s default protective order provided in Appendix B to the Trial Practice Guide.

III. Certification of Conference with Opposing Counsel

Pursuant to 37 C.F.R. § 42.54, Counsel for RMC has conferred with Counsel for Duration, and Duration does not oppose this motion.

IV. Conclusion.

For the above reasons, Patent Owner requests that Exhibits 1020 and 1022, and the Patent Owner’s Demonstrative Exhibit Paper 66 be kept under seal.

Dated: May 28, 2024

Respectfully submitted,

/Ragnar Olson/

Ragnar Olson

Reg. No. 58,684

Global IP Law Group, LLC
55 W. Monroe Street, Suite 3400
Chicago, IL 60603
Ph.: (312) 241-1503
Lead Counsel for Patent Owner

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on May 28, 2024, a complete and correct copy of the foregoing PATENT OWNER'S MOTION TO SEAL was served via electronic mail on the following counsel of record for Petitioner:

Kevin Greenleaf (Reg. No. 64,062)
Dentons US LLP
233 South Wacker Drive, Suite 5800
Chicago, IL 60606
Telephone: 650-798-0381
Email: kevin.greenleaf@dentons.com; ipt.docketchi@dentons.com

Joel Bock (Reg. No. 36,456)
Dentons US LLP
233 South Wacker Drive, Suite 5800
Chicago, IL 60606
Telephone: 212-398-8484
Email: joel.bock@dentons.com

/Ragnar Olson/
Ragnar Olson, Reg. No. 58,684
rolson@giplg.com
Global IP Law Group, LLC
55 W. Monroe Street
Suite 3400
Chicago, IL 60603