UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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SEMICONDUCTOR COMPONENTS INDUSTRIES, LLC and
TEXAS INSTRUMENTS INCORPORATED,
Petitioner,

v.

GREENTHREAD LLC
Patent Owner

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Case: IPR2023-01242
U.S. Patent No. 11,121,222

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PATENT OWNER'S RENEWED MOTION TO SEAL CERTAIN PAPERS AND EXHIBITS

Pursuant to 37 C.F.R. §§ 42.14, 42.54 and the Board's Order (Paper 96, "Order"), Patent Owner, Greenthread, LLC, ("Patent Owner" or "PO") respectfully submits this Motion to Seal. Patent Owner moves to seal the following Papers and Exhibits in their entirety:

1. Petitioner's Opposition to Patent Owner's Motion for Additional Discovery (Paper 11)
2. Petitioner's Authorized Reply to Patent Owner's Preliminary Response (Paper 22)
3. Petitioner's Reply to Patent Owner's Response (Paper 62)
4. Exhibit 1046 (Email from PO's counsel dated October 11, 2023)
5. Exhibit 1047 (Email from PO's counsel dated October 12, 2023)
6. Exhibit 1053 (Deposition transcript of Philip John)
7. Exhibit 2029 (Email communications from PO's counsel to Petitioner's counsel between May 26 and June 1, 2023)
8. Exhibit 2056 (Email communications between the Board, Petitioner's counsel, and PO's counsel dated November 27, 2023)

Further, Patent Owner is concurrently filing redacted versions of Paper 22 and Exhibits 2029 and 2056.[1] Patent Owner has conferred with Petitioner, and Petitioner indicated that it does not oppose.

[1] The Board notes that Petitioner previously filed redacted versions of Papers 11 and 62 and Exhibits 1046, 1047, and 1053, "[h]owever, the redacted versions … were not accompanied by new motions to seal as [the Board] ordered." Order, 7. Thus, to maintain these papers and exhibits under seal, Patent Owner files the current motion.

I. GOOD CAUSE EXISTS

The Office Trial Practice Guide states that a "document or thing will be made publicly available, unless a party files a motion to seal that is then granted by the Board." Office Trial Practice Guide (Nov. 2019) ("TPG") at 19; *see also* 35 U.S.C. § 316(a)(7). "The document or thing will be protected on receipt of the motion and remain so, pending the outcome of the decision on motion." *Id.* The TPG states that "protective orders may be issued for good cause by the Board to protect a party from disclosing confidential information." *Id.* at 20 (citing 37 C.F.R. § 42.54). Here, there is good cause for sealing these various papers and exhibits because Patent Owner is under confidentiality obligations regarding licensing information referenced therein. Patent Owner requests to seal the information to avoid potential disputes with the parties to whom Patent Owner owes confidentiality obligations, who have specifically requested that Greenthread maintain the confidentiality. Further, certain exhibits contain email correspondence that discusses sensitive, confidential, and non-public business information.

II. PROTECTIVE ORDER

Patent Owner previously requested entry of a modified protective order. Upon entry of that modified protective order, Patent Owner designates the above papers and exhibits in their entirety as "PROTECTIVE ORDER MATERIAL."

As discussed above, Patent Owner is concurrently filing redacted versions of Paper 22 and Exhibits 2029 and 2056.

III. CONCLUSION

For at least the foregoing reasons, Patent Owner requests that the Board seal the aforementioned papers and exhibits in their entirety.

Date: May 2, 2025 Respectfully submitted,

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CERTIFICATION OF SERVICE

The undersigned hereby certifies that the foregoing **RENEWED MOTION TO SEAL CERTAIN PAPERS AND EXHIBITS** has been served on Petitioner via email on the following counsel of record for Petitioner:

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