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,
Petitioners,

v.

GREENTHREAD LLC
Patent Owner

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Case: IPR2023-01243[1]
U.S. Patent No. 10,510,842

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JOINT MOTION TO SEAL PARTIES' JOINT PAPER CONCERNING ADDITIONAL DISCOVERY

[1] Texas Instruments Incorporated, which filed a petition in IPR2024-00672, has been joined as a party to this proceeding.

Pursuant to 37 C.F.R. §§ 42.14 and 42.54, Patent Owner, Greenthread, LLC ("Patent Owner") and Petitioner Semiconductor Components Industries, LLC ("Petitioner") respectfully submit this Joint Motion to Seal. The parties move to seal the Joint Paper Concerning Additional Discovery in its entirety, subject to the concurrent submission of a redacted public version of the Joint Paper.

Patent Owner has narrowly tailored its redactions for the public version of the Joint Paper. Patent Owner submits that there is good cause for sealing the redacted portions of the Joint Paper, as Patent Owner is under confidentiality obligations regarding certain licensing information referenced in the redacted portions. Petitioner has not identified any confidential material in the Joint Paper, but Petitioner does not oppose sealing Patent Owner's proposed redacted portions of the Joint Paper.

The parties have conferred regarding the contents of the present Joint Motion. Furthermore, the parties have conferred regarding the narrow redactions of confidential information found in the Parties' Non-Public Version of the Joint Paper Concerning Discovery.

Date: May 30, 2025 Respectfully submitted,

<u>/s/ Alan Whitehurst</u> Alan Whitehurst Reg. No. 43,263 awhitehurst@mckoolsmith.com MCKOOL SMITH, P.C. 1717 K St. NW, Suite 1000 Washington, DC 20006 Telephone: (202) 370-8300 *Lead Counsel for Patent Owner Greenthread, LLC*	*<u>/s/ Roger Fulghum</u>* Roger Fulghum Reg. No. 39,678 Roger.fulghum@bakerbotts.com BAKER BOTTS L.L.P. One Shell Plaza, 910 Louisiana Street Houston, TX 77002 Telephone: (713) 229-1234 *Lead Counsel for Petitioner Semiconductor Component Industries, LLC*