

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SEMICONDUCTOR COMPONENTS INDUSTRIES, LLC,
Petitioner

v.

GREENTHREAD, LLC,
Patent Owner

Case: IPR2023-01244
U.S. Patent No. 11,121,222

**PATENT OWNER'S MOTION TO SEAL
PURSUANT TO 37 C.F.R. §§ 42.14 & 42.54**

Pursuant to 37 C.F.R. §§ 42.14 and 42.54, Patent Owner, Greenthread, LLC (“Patent Owner”) respectfully submits this Motion to Seal. Patent Owner moves to seal Patent Owner’s Sur-reply and Ex 2081 (filed concurrently with the present Motion) in their entirety, subject to the concurrent filing of redacted public versions of this paper and exhibit. Patent Owner has conferred with Petitioner, and Petitioner indicated it “will not oppose narrowly tailored redactions of genuinely confidential information, as the Board has recently approved.”

I. GOOD CAUSE EXISTS

The Office Trial Practice Guide (TPG) 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) 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 C.F.R. § 42.54). Here, there is good cause for sealing the redacted portions of Patent Owner’s Sur-reply and Ex 2081. First, Patent Owner is under confidentiality obligations regarding licensing information referenced in the redacted portions. Patent Owner itself does not desire to maintain the confidentiality of the information, and believes that some of it may be public. Nevertheless, Patent Owner requests to seal the information to avoid

potential disputes with the party to whom Greenthread owes confidentiality obligations, who has specifically requested that Greenthread maintain the confidentiality. Second, Patent Owner seeks to seal sensitive information regarding a deponent's health.

II. PROTECTIVE ORDER

On September 11, 2024, the Board entered the modified protective order. Under the modified protective order, Patent Owner designates Patent Owner's Sur-reply and Ex 2081 in their entirety as "PROTECTIVE ORDER MATERIAL."

III. CONCLUSION

For at least the foregoing reasons, Patent Owner requests that the Board seal Patent Owner's Sur-reply and Ex 2081 in their entirety, subject to the concurrent filing of the redacted public versions of this paper and exhibit.

Dated: September 23, 2024

Respectfully submitted,

/Alan Whitehurst/

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Counsel for Patent Owner

CERTIFICATION OF SERVICE

The undersigned hereby certifies that a copy of this **PATENT OWNER'S MOTION TO SEAL PURSUANT TO 37 C.F.R. §§ 42.14 & 42.54** has been served on Petitioner via email on the following counsel of record for petitioner:

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