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.

_____

Case: IPR2023-01244[1]
U.S. Patent No. 11,121,222

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

[1] Texas Instruments Incorporated, which filed a petition in IPR2024-00674, has been joined as a petitioner in this proceeding

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 Post-Remand Brief Concerning Board-Ordered Discovery (filed concurrently with the present Motion) in its entirety, along with Exhibit 2104. Patent Owner will file redacted versions of each document in due course. Patent Owner conferred with Petitioner, who indicated that it would not oppose.

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 Patent Owner's Post-Remand Brief Concerning Board-Ordered Discovery because Patent Owner is under confidentiality obligations regarding licensing information referenced therein. 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 any party to whom Greenthread owes confidentiality obligations and who has specifically requested that Greenthread maintain the confidentiality. Further, there is good cause for sealing Exhibit 2104 because the

deposition transcript contains confidential information regarding related to Petitioner's customers and business.

II. PROTECTIVE ORDER

Patent Owner previously requested entry of a modified protective order. Upon entry of that modified protective order, Patent Owner designates Patent Owner's Post-Remand Brief Concerning Board-Ordered Discovery and Exhibit 2104 in their as "PROTECTIVE ORDER MATERIAL."

As discussed above, Patent Owner will file a redacted copy of each document within due course.

III. CONCLUSION

For at least the foregoing reasons, Patent Owner requests that the Board seal Patent Owner's Post-Remand Brief Concerning Board-Ordered Discovery and Exhibit 2104 in their entirety, subject to the later filing of the redacted public version of these documents.

Dated: August 12, 2025

Respectfully submitted,

/Alan Whitehurst/

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Counsel for Patent Owner
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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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The foregoing has also been served on the joined party via email on the following counsel of record for the joined party:

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Dated: August 12, 2025 By: */Alan Whitehurst/*
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