UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SEMICONDUCTOR COMPONENTS INDUSTRIES, LLC, and
TEXAS INSTRUMENTS INCORPORATED,
Petitioners,
v.

GREENTHREAD, LLC,
Patent Owner.

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

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

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[1] Texas Instruments Incorporated, which filed a petition in IPR2024-00674, 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") respectfully submits this Motion to Seal. Patent Owner moves to seal Petitioner's Authorized Response to Director Review Request (Paper 123). Patent Owner is concurrently filing a redacted version of Petitioner's Authorized Response to Director Review Request. The parties conferred, and Petitioner indicated that it would not oppose Patent Owner's Motion.

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 Petitioner's Authorized Response to Director Review Request 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.

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 Request for Director Review in its entirety as "PROTECTIVE ORDER MATERIAL."

As discussed above, Patent Owner is concurrently filing a redacted copy of Petitioner's Authorized Response to Director Review Request.

III. CONCLUSION

For at least the foregoing reasons, Patent Owner requests that the Board seal Petitioner's Authorized Response to Director Review Request in its entirety, subject to the concurrent filing of a redacted public version of this paper.

Dated: November 21, 2025

Respectfully submitted,

/Alan Whitehurst/

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CERTIFICATION OF SERVICE

The undersigned hereby certifies that the foregoing **MOTION TO SEAL PATENT OWNER'S REQUEST FOR DIRECTOR REVIEW** has been served on Petitioners electronically via email on the following counsel of record for Petitioners:

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