

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

LG ELECTRONICS INC.,
Petitioner,

v.

PANTECH WIRELESS, LLC,
Patent Owner.

IPR2023-01267 (Patent 9,313,809 B2)
IPR2023-01268 (Patent 9,575,631 B2)
IPR2023-01269 (Patent 9,854,545 B2)
IPR2023-01270 (Patent 10,869,247 B2)
IPR2023-01272 (Patent 9,065,486 B2)
IPR2023-01273 (Patent 9,136,924 B2)

**PETITIONER'S MOTION TO SEAL
UNDER 37 C.F.R. §§ 42.14 and 42.54**

Pursuant to 37 C.F.R. §§ 42.14 and 42.54 and Section 1(E)(4) and Appendix B of the Trial Practice Guide, Petitioner LG Electronics Inc. (“Petitioner”) respectfully requests that Petitioner’s Reply in Support of its Motion to Disqualify Mayer Brown (“Reply”) be maintained under seal in the above-captioned IPR proceedings, and designated as RESTRICTED CONFIDENTIAL – ATTORNEYS’ EYES ONLY under the Proposed Protective Order. Petitioner is concurrently submitting a redacted version of the Reply separately.

Good cause exists for sealing the confidential information in LGE’s Reply which includes party confidential information relating to confidential trade secret information, including that information that was submitted under seal in other filings before the Board and the district court. Accordingly, LG Electronics requests that the confidential information filed as part of Petitioner’s Reply be sealed pursuant to the terms of that Proposed Protective Order.

Respectfully submitted,

Dated: December 13, 2023

By: /James L. Davis, Jr./
Name: James L. Davis, Jr.
Registration No. 57,325

Counsel for Petitioner LG Electronics Inc.

CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the foregoing PETITIONER'S MOTION TO SEAL UNDER 37 C.F.R. §§ 42.14 and 42.54 was served via electronic mail to the following attorneys of record for the Patent Owner listed below:

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Motion to Seal - IPR2023-01267, -01268, -01269, -01270, -01272, -01273

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Dated: December 13, 2023

By: /Jonathan Bradford/

Name: Jonathan Bradford

ROPES & GRAY LLP