UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

CIRRUS LOGIC, INC. and
OMNIVISION TECHNOLOGIES, INCORPORATED, and
TEXAS INSTRUMENTS INCORPORATED,
Petitioners,
v.

GREENTHREAD, LLC,
Patent Owner.

IPR2024-00001[1]
U.S. Patent No. 10,734,481

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 IPR2024-00772, 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 Patent Owner's Opposition to Petitioners' Motion to Exclude Exhibit 2072 (filed concurrently with the present Motion) in its entirety. Patent Owner conferred with Petitioners, and Petitioner Cirrus Logic, Inc., stated that Petitioner could "make a decision whether to oppose the motion[] to seal only after reviewing Greenthread's opposition."

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 Opposition to Petitioners' Motion to Exclude 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 Opposition to Petitioners' Motion to Exclude in its entirety as "PROTECTIVE ORDER MATERIAL."

Patent Owner intends to file a redacted copy of Patent Owner's Opposition to Petitioners' Motion to Exclude within one week of filing.

III. CONCLUSION

For at least the foregoing reasons, Patent Owner requests that the Board seal Patent Owner's Opposition to Petitioner's Motion to Exclude in its entirety. As noted above, Patent Owner also intends to file a redacted copy of the Opposition to Petitioners' Motion to Exclude within one week of filing.

Dated: January 17, 2025

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 Petitioners electronically via email on the following counsel of record for Petitioners:

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