UNITED STATES PATENT AND TRADEMARK OFFICE

_____

BEFORE THE PATENT TRIAL AND APPEAL BOARD

_____

CIRRUS LOGIC, INC.;
OMNIVISION TECHNOLOGIES, INC.; AND
TEXAS INSTRUMENTS INC.,
Petitioners,

v.

GREENTHREAD LLC
Patent Owner

_____

Case: IPR2024-00001
U.S. Patent No. 10,734,481

_____

JOINT CHART CONCERNING PRIOR MOTIONS TO SEAL

Pursuant to the Board's May 28, 2025 Order (Paper 85), the Parties jointly submit the following chart that identifies all unresolved motion(s) to seal, the corresponding document(s) (papers or exhibits) sought to be sealed by these motions, the information sought to be sealed, and the status of any redacted versions of those document(s). Patent Owner is concurrently filing the redacted document(s) highlighted in the chart below. Petitioner does not take any position on whether the information sought to be sealed by Patent Owner is confidential or whether its characterization in the below table is correct. Petitioner specifically disagrees with the characterization of certain parties as "potentially in privity," as Petitioner denies any privity with those parties.

Undecided Motion to Seal	**Document(s) Sought to be Sealed**	**Redacted Version / Status**	**Information Sought to be Sealed**
Paper 51	Paper 9 (PO Motion for Additional Discovery)	Paper 40	Names of parties potentially in privity with Petitioners and associated products
	Paper 11 (Petitioner's Response to PO's Discovery Motion)	Paper 38	Names of parties in potentially privity with Petitioners and other licensing information
	Paper 13 (PO Reply in Support of Discovery Motion)	Paper 41	Names of parties potentially in privity with Petitioners and associated products
	Paper 15 (PO Preliminary Response)	Paper 42	Names of parties potentially in privity with Petitioners and associated products

Undecided Motion to Seal	Document(s) Sought to be Sealed	Redacted Version / Status	Information Sought to be Sealed
	Paper 19 (Petitioner's Preliminary Reply)	Paper 39	Names of parties potentially in privity with Petitioners and other licensing information

Undecided Motion to Seal	Document(s) Sought to be Sealed	Redacted Version / Status	Information Sought to be Sealed
Paper 51	Paper 32 (Director Review Request of Institution Decision)	Paper 43	N/A
	Paper 45 (PO Response)	Paper 47	Names of parties potentially in privity with Petitioners, associated products, and other previous licensees
	Ex. 2011 (Oct. 2023 email chain between counsel)	[REDACTED] Ex. 2011	Names of parties potentially in privity with Petitioners
	Ex. 2016 (Oct. 2023 email chain between counsel)	[REDACTED] Ex. 2016	Names of parties potentially in privity with Petitioners
	Ex. 2022 (Confidential agreement)	[REDACTED] Ex. 2022	Name of a party potentially in privity with Petitioners and prior proceedings involving the party
	Ex. 2028 (Confidential declaration)	[REDACTED] Ex. 2028	Names of parties potentially in privity with Petitioners and licensing information
	Ex. 2034 (Confidential agreement)	[REDACTED] Ex. 2034	Names of parties potentially in privity with Petitioners and licensing information
	Ex. 2037 (Jan. 2024 email chain between counsel)	[REDACTED] Ex. 2037	Names of PO's prior licensees

Undecided Motion to Seal	Document(s) Sought to be Sealed	Redacted Version / Status	Information Sought to be Sealed
Paper 51	Ex. 2038 (Oct. 2023 email chain between counsel)	[REDACTED] Ex. 2038	Names of parties potentially in privity with Petitioners
	Ex. 2044 (Nov.-Dec. 2023 email chain between counsel)	[REDACTED] Ex. 2044	Names of parties potentially in privity with Petitioners
	Ex. 2072 (Declaration of Dr. Mohan Rao)	[REDACTED] Ex. 2072	Names of PO's prior licensees
Paper 62	Paper 63 (PO Sur-Reply)	Paper 65	Names of PO's prior licensees
Paper 68	Paper 69 (PO Opposition to Petitioner's Motion to Exclude)	x	Names of PO's prior licensees
Paper 79	Paper 78 (Final Written Decision)	Paper 80	Names of PO's prior licensees and other parties potentially in privity with Petitioners
Paper 82	Paper 83 (Director Review Request of Final Written Decision)	Paper 84	Names of parties potentially in privity with Petitioners

Date: June 11, 2025 Respectfully submitted,

/s/ Alan Whitehurst Alan Whitehurst Reg. No. 43,263 awhitehurst@mckoolsmith.com MCKOOL SMITH, P.C. 1717 K St. NW, Suite 1000 Washington, DC 20006 Telephone: (202) 370-8300 *Counsel for Patent Owner Greenthread, LLC*	*/s/ Anupam Sharma* Anupam Sharma Reg. No. 55,609 asharma@cov.com COVINGTON & BURLING LLP 300 El Camino Real, 5 Palo Alto Square, Palo Alto, CA 94306 */s/ David Bluestone* David Bluestone Reg. No. 44,541 dbluestone@beneschlaw.com Benesch Friedlander Coplan & Aronoff LLP 71 South Wecker Drive, Suite 1600 Chicago, IL 60606 *Counsel for Petitioners*

CERTIFICATION OF SERVICE

The undersigned hereby certifies that the foregoing **JOINT CHART CONCERNING PRIOR MOTIONS TO SEAL** has been served on Petitioner via email on the following counsel of record:

Scott Weidenfeller
sweidenfeller@cov.com
Covington & Burling LLP
One CityCenter,
850 Tenth Street, NW
Washington, DC 20001

Anupam Sharma
asharma@cov.com
Covington & Burling LLP
3000 El Camino Real,
5 Palo Alto Square,
Palo Alto, CA 94306

GT-Cirrus-IPR@cov.com

Bert Greene
bgreene@duanemorris.com
DUANE MORRIS LLP
Las Cimas IV
900 S. Capital of Texas Hwy., Suite 300,
Austin, TX 78746

David H. Bluestone
dbluestone@beneschlaw.com
Benesch Friedlander Coplan & Aronoff LLP
71 South Wacker Drive, Suite 1600
Chicago, IL 60606

The foregoing **JOINT CHART CONCERNING PRIOR MOTIONS TO SEAL** has also been served on the joined party via email on the following counsel of record for the joined party:

Joshua A. Griswold
griswold@fr.com
Patrick J. Bisenius
bisenius@fr.com
Fish & Richardson P.C.
60 South Sixth Street, Suite 3200
Minneapolis, MN 55402

IPR12189-0084IP1@fr.com
PTABInbound@fr.com

Dated: June 11, 2025

By: */s/ Alan Whitehurst*
Alan Whitehurst
Reg. No. 43,263

Counsel for Patent Owner
Greenthread, LLC