UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

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

GREENTHREAD, LLC,
Patent Owner.

IPR2024-00016
U.S. Patent No. 10,510,842

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

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/

Alan Whitehurst
Reg. No. 43,263
awhitehurst@mckoolsmith.com
Nicholas T. Matich
Reg. No. L1,373
nmatich@mckoolsmith.com
Arvind Jairam
Reg. No. 62,759
ajairam@mckoolsmith.com
Stuart McCommas
Reg. No. 71,834
smccommas@mckoolsmith.com
McKool Smith, P.C.
1717 K St. NW, Suite 1000
Washington, DC 20006
Telephone: (202) 370-8300
Facsimile: (202) 370-8344

Archis "Neil" Ozarkar
Reg. No. 71,265
nozarkar@mckoolsmith.com
McKool Smith, P.C.
600 Travis Street, Suite 600
Houston, TX 77002
Telephone: (713) 485-7300
Facsimile: (713) 485-7344

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:

Scott Weidenfeller
sweidenfeller@cov.com
Rajesh Paul
rpaul@cov.com
Covington & Burling LLP
One CityCenter,
850 Tenth Street, NW
Washington, DC 20001-4956
Telephone: (202) 662-5923
Facsimile: (202) 778-5923

Anupam Sharma
asharma@cov.com
Covington & Burling LLP
3000 El Camino Real,
5 Palo Alto Square,
Palo Alto, CA 94306
Telephone: (650) 632-4720
Facsimile: (650) 632-4800

Bert Greene
bgreene@duanemorris.com
Andrew Liddell
waliddell@duanemorris.com
DUANE MORRIS LLP
Las Cimas IV
900 S. Capital of Texas Hwy., Suite 300
Austin, TX 78746
Telephone: (512) 277-2246
Facsimile: (512)277-2301

David H. Bluestone
dbluestone@beneschlaw.com
Barack Ferrazzano Kirschbaum &
Nagelberg LLP
200 West Madison St., Suite 3900
Chicago, Illinois 60606
Telephone: (312) 984-3106
Facsimile: (312) 984-3150

GT-OmniVisionIPR@beneschlaw.com
GT-Cirrus-IPR@cov.com

Dated: January 17, 2025 By: */Alan Whitehurst/*
Alan Whitehurst, Reg. No. 43,263