IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

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**BEFORE THE PATENT TRIAL AND APPEAL BOARD**

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CIRRUS LOGIC, INC.;
OMNIVISION TECHNOLOGIES, INC.; AND
TEXAS INSTRUMENTS INCORPORATED,
Petitioner,
v.

GREENTHREAD LLC,
Patent Owner.

Case No. IPR2024-00018[1]
Patent No. 9,190,502

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**PETITIONER'S MOTION TO SEAL PURSUANT TO 37 C.F.R. §§ 42.14 & 42.54**

[1] Texas Instruments Inc. ("TI"), which filed a petition in IPR2024-00773, has been joined as a party to this proceeding.

Pursuant to 37 C.F.R. §§ 42.14 and 42.54, Cirrus Logic, Inc. and OmniVision Technologies, Inc. ("Petitioner") respectfully submits this Motion to Seal. Petitioner moves to seal Petitioner's Responsive Post-Hearing Brief Concerning Board-Ordered Discovery (filed concurrently with the present Motion) in its entirety. Petitioner will file a redacted version of the document in due course. Petitioner conferred with Patent Owner, who indicated that it would not oppose.

## 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 Responsive Post-Hearing Brief Concerning Board-Ordered Discovery because it contains confidential information related to Petitioner's customers and business, as well as that of real party-in-interest GlobalFoundries U.S., Inc. It also contains information that Patent Owner appears to claim is under confidentiality obligations regarding licensing information.

## II. PROTECTIVE ORDER

Patent Owner previously requested entry of a modified protective order. Upon entry of that modified protective order, Petitioner designates Petitioner's Responsive Post-Hearing Brief Concerning Board-Ordered Discovery in its entirety as "PROTECTIVE ORDER MATERIAL."

As discussed above, Petitioner will file a redacted copy of the document in due course.

## III. CONCLUSION

For the foregoing reasons, Petitioner requests that the Board seal Petitioner's Responsive Post-Hearing Brief Concerning Board-Ordered Discovery in its entirety, subject to the later filing of the redacted public version of this document.

Date: August 26, 2025

Respectfully submitted,

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*Counsel for Petitioner*

## CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. §42.6(e), I certify that on August 26 2025, Petitioner's Motion to Seal was served by email on the following counsel for Patent Owner:

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