UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

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

v.

GREENTHREAD, LLC,
Patent Owner.

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

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

[1] Texas Instruments Incorporated, which filed a petition in IPR2024-00773, has been joined as a party in this proceeding.

Pursuant to 37 C.F.R. §§ 42.14 and 42.54, Patent Owner, Greenthread, LLC ("PO") respectfully submits this Motion to Seal. PO moves to seal PO's Reply Post-Hearing Brief (filed concurrently with the present Motion) in its entirety. PO will file redacted versions of the brief in due course. PO conferred with Petitioners, who indicated that they 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 PO's Reply Post-Hearing Brief because it includes confidential information (previously discussed in PO's Post-Hearing Brief Concerning Board-Ordered Discovery) regarding Petitioners' customers and business. PO has conferred with Petitioners who indicated that they will provide proposed redactions that Patent Owner will file in due course.

II. PROTECTIVE ORDER

PO previously requested entry of a modified protective order. Upon entry of that modified protective order, PO designates PO's Reply Post-Hearing in its entirety as "PROTECTIVE ORDER MATERIAL."

As discussed above, PO will file a redacted copy of the brief within due course.

III. CONCLUSION

For at least the foregoing reasons, PO requests that the Board seal PO's Reply Post-Hearing Brief in its entirety, subject to the later filing of the redacted public version of this brief.

Dated: September 2, 2025 Respectfully submitted,

/Alan Whitehurst/

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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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