

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

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

v.

GREENTHREAD LLC
Patent Owner

Case: IPR2024-00020
U.S. Patent No. 11,121,222

JOINT CHART CONCERNING PRIOR MOTIONS TO SEAL

Pursuant to the Board’s May 28, 2025 Order (Paper 77), 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 49	Paper 9 (PO Motion for Additional Discovery)	Paper 38	Names of parties potentially in privity with Petitioners and associated products
	Paper 11 (Petitioner’s Response to PO’s Discovery Motion)	Paper 36	Names of parties potentially in privity with Petitioners and other licensing information
	Paper 13 (PO Reply in Support of Discovery Motion)	Paper 39	Names of parties potentially in privity with Petitioners and associated products
	Paper 16 (PO Preliminary Response)	Paper 40	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 20 (Petitioner's Preliminary Reply)	Paper 37	Name of parties potentially in privity with Petitioners and other licensing information
	Paper 32 (Director Review Request of Institution Decision)	Paper 41	N/A

Undecided Motion to Seal	Document(s) Sought to be Sealed	Redacted Version / Status	Information Sought to be Sealed
	Paper 43 (PO Response)	Paper 45	Names of parties potentially in privity with Petitioners, associated products, and other previous licensees
Paper 49	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	Names of 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 other licensing information
	Ex. 2034 (Confidential agreement)	[REDACTED] Ex. 2034	Names of parties potentially in privity with

Undecided Motion to Seal	Document(s) Sought to be Sealed	Redacted Version / Status	Information Sought to be Sealed
			Petitioners and other licensing information
	Ex. 2037 (Jan. 2024 email chain between counsel)	[REDACTED] Ex. 2037	Names of PO's prior licensees
	Ex. 2038 (Oct. 2023 email chain between counsel)	[REDACTED] Ex. 2038	Names of parties potentially in privity with Petitioners

Undecided Motion to Seal	Document(s) Sought to be Sealed	Redacted Version / Status	Information Sought to be Sealed
Paper 49	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 57	Paper 58 (PO Sur-Reply)	Paper 60	Names of PO's prior licensees
Paper 63	Paper 64 (PO Opposition to Petitioner's Motion to Exclude)	x	Names of PO's prior licensees

Date: June 11, 2025

Respectfully submitted,

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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:

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Dated: June 11, 2025

By: /s/ Alan Whitehurst

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