

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SEMICONDUCTOR COMPONENTS INDUSTRIES, LLC
Petitioner,

v.

GREENTHREAD LLC
Patent Owner

Case: IPR2024-00265
U.S. Patent No. 9,190,502

PATENT OWNER'S MOTION TO SEAL

Pursuant to the Board’s recent Order on the Conduct of the Proceedings (Paper 77), Patent Owner, Greenthread, LLC, (“Patent Owner” or “PO”) respectfully submits this Motion to Seal. Patent Owner moves to seal the following documents in their entirety:

Sealed / Original Document		Public / Redacted Document (X denotes concurrent filing)
Patent Owner’s Request to File a Motion for Additional Discovery	Paper 7	Paper 20
Patent Owner’s Preliminary Response	Paper 14	Paper 21
Email communication from Petitioner’s counsel to Patent Owner’s counsel October 16, 2023	Ex. 2002	7/29/2024
Email communication from Petitioner’s counsel to Patent Owner’s counsel October 11, 2023	Ex. 2014	7/29/2024
Confidential agreement	Ex. 2022	7/29/2024
Confidential declaration	Ex. 2028	7/29/2024
Email communication from Patent Owner’s counsel to Petitioner’s counsel between May 26 to June 1, 2023	Ex. 2029	X
Email communications between Petitioner’s counsel and Patent Owner’s counsel, dated Oct. 31, 2023-Nov. 1, 2023	Ex. 2049	X

Sealed / Original Document		Public / Redacted Document (X denotes concurrent filing)
Email communications between Petitioner's counsel and Patent Owner's counsel, dated Nov. 2-7, 2023	Ex. 2050	X
Email communications between Petitioner's counsel and Patent Owner's counsel, dated Nov. 14-15, 2023	Ex. 2051	X
Email communications between Petitioner's counsel and Patent Owner's counsel, dated Dec. 12-13, 2023	Ex. 2052	7/29/2024
Email communications between the Board, Petitioner's counsel, and Patent Owner's counsel dated November 27, 2023	Ex. 2056	X
Confidential agreement	Ex. 2063	7/29/2024
IPR2023-01242 Patent Owner's Motion for Additional Discovery, Paper 8	Ex. 2901	7/29/2024
IPR2023-01242 Petitioner's Opposition to Patent Owner's Motion for Additional Discovery, Paper 11	Ex. 2902	7/29/2024
IPR2023-01242 Patent Owner's Reply In Support of PO's Motion for Additional Discovery, Paper 14	Ex. 2903	7/29/2024

Sealed / Original Document		Public / Redacted Document (X denotes concurrent filing)
IPR2023-01242 Order Denying Patent Owner's Motion for Additional Discovery, Paper 30	Ex. 2904	7/29/2024
IPR2023-01243 Patent Owner's Motion for Additional Discovery, Paper 7	Ex. 2905	7/29/2024
IPR2023-01243 Petitioner's Opposition to Patent Owner's Motion for Additional Discovery, Paper 10	Ex. 2906	7/29/2024
IPR2023-01243 Patent Owner's Reply In Support of PO's Motion for Additional Discovery, Paper 13	Ex. 2907	7/29/2024
IPR2023-01243 Order Denying Patent Owner's Motion for Additional Discovery, Paper 29	Ex. 2908	7/29/2024
IPR2023-01244 Patent Owner's Motion for Additional Discovery, Paper 8	Ex. 2909	7/29/2024
IPR2023-01244 Petitioner's Opposition to Patent Owner's Motion for Additional Discovery, Paper 11	Ex. 2910	7/29/2024
IPR2023-01244 Patent Owner's Reply In Support of PO's Motion for Additional Discovery, Paper 14	Ex. 2911	7/29/2024
IPR2023-012434 Order Denying Patent Owner's Motion for Additional Discovery, Paper 30	Ex. 2912	7/29/2024

PO either (a) previously filed redacted versions of the above documents or (b) is concurrently filing a redacted version according to the table above.

I. GOOD CAUSE EXISTS

The Office Trial Practice Guide 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) (“TPG”) 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 37 C.F.R. § 42.54). Here, there is good cause for sealing the above documents 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 believe that some of it may be public. Nevertheless, Patent Owner requests to seal the information to avoid potential disputes with the parties to whom Patent Owner owes confidentiality obligations, who have 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 the

documents included in the list above in their entirety as “PROTECTIVE ORDER MATERIAL.”

III. CONCLUSION

For at least the foregoing reasons, Patent Owner requests that the Board seal the documents included in the list above and referred to in the Board’s recent Order in their entirety.

Date: December 9, 2025

Respectfully submitted,

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CERTIFICATION OF SERVICE

The undersigned hereby certifies that the foregoing **MOTION TO SEAL** has been served on Petitioner via email on the following counsel of record for Petitioner:

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Dated: December 9, 2025

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