

**UNITED STATES PATENT AND TRADEMARK OFFICE**

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**BEFORE THE PATENT TRIAL AND APPEAL BOARD**

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SEMICONDUCTOR COMPONENTS INDUSTRIES, LLC  
Petitioner,

v.

GREENTHREAD LLC  
Patent Owner

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Case: IPR2023-00266  
U.S. Patent No. 8,421,195

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**PATENT OWNER'S MOTION TO SEAL PETITIONER'S REPLY  
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, respectfully submits this Motion to Seal. Patent Owner moves to seal Petitioner's Reply (Paper 41) in its entirety and is concurrently filing a redacted version. Petitioner does not oppose the sealing of Patent Owner's proposed redacted portions of the Reply.

## **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 Petitioner's Reply because Patent Owner is under confidentiality obligations regarding licensing information references 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 requests 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 Petitioner's Reply (Paper 41) in its entirety as "PROTECTIVE ORDER MATERIAL."

As discussed above, Patent Owner is concurrently filing a redacted copy of Petitioner's Reply.

## **III. CONCLUSION**

For at least the foregoing reasons, Patent Owner requests that the Board seal Petitioner's Reply in its entirety.

Date: March 14, 2025

Respectfully submitted,

/s/ Alan Whitehurst

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**CERTIFICATION OF SERVICE**

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

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Dated: March 14, 2025

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