**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: IPR2024-00266
U.S. Patent No. 8,421,195

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# PATENT OWNER'S MOTION TO SEAL 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, ("Patent Owner") respectfully submits this Motion to Seal. Patent Owner moves to seal Patent Owner's Sur-reply in its entirety and is concurrently filing a redacted version. Patent Owner has conferred with Petitioner, and Petitioner indicated that it "will not oppose narrowly tailored redactions of genuinely confidential information, as the Board has approved."

## 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 Patent Owner's Sur-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 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 Patent Owner's Sur-reply in its entirety as "PROTECTIVE ORDER MATERIAL."

As discussed above, Patent Owner is concurrently filing a redacted copy of Patent Owner's Sur-reply.

## III. CONCLUSION

For at least the foregoing reasons, Patent Owner requests that the Board seal Patent Owner's Sur-reply in its entirety, subject to the concurrent filing of the redacted public versions of this paper.

Date: March 21, 2025

Respectfully submitted,

*/s/ Alan Whitehurst*

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## CERTIFICATION OF SERVICE

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

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Dated: March 21, 2025

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