UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

ENDYMED MEDICAL LTD., ENDYMED MEDICAL, INC.,
Petitioner,

v.

SERENDIA, LLC,
Patent Owner.

Case No. IPR2024-00386

U.S. Patent No. 9,480,836

PETITIONER'S MOTION TO FILE DOCUMENTS UNDER SEAL

I. INTRODUCTION

Pursuant to 37 C.F.R. §§ 42.14 and 42.54, Petitioner EndyMed Medical Ltd. and EndyMed Medical, Inc. (collectively "EndyMed" or "Petitioner") respectfully requests the Board authorize the filing under seal of Petitioner's Reply to Patent Owner's Response and Exs.1043-1044 (collectively, "Confidential Exhibits"). Petitioner identifies certain portions of Petitioner's Reply to Patent Owner's Response and Exs.1043-1044 as containing confidential information and explains the good cause for placing it under seal. Filed herewith is a redacted version of Petitioner's Reply to Patent Owner's Response and Exs.1043-1044, and unredacted copies of Petitioner's Reply to Patent Owner's Response and Exs.1043-1044 as available to Petitioner, Patent Owner, Serendia, LLC (hereinafter "Patent Owner"), and the Board only. Patent Owner filed a proposed protective order on March 20, 2024 (Paper 9), which was granted on June 5, 2024 (Paper 17).

II. Good Cause Exists for Sealing Certain Confidential Information

The redacted portions of Petitioner's Reply to Patent Owner's Response; Ex.1043, the Supplemental Declaration of Dr. Jean Woloszko; and Ex.1044, which is the April 18, 2025 Deposition Transcript of Dr. David J. Goldberg, each include quotes and discussions of Ex.2062. On November 5, 2024, Patent Owner moved to seal Ex.2062, which Patent Owner has stated "contain[s] Patent Owner's highly sensitive, non-public technical information, including documents relating to the

design and development of their products," that was "filed during the ITC investigation and convey confidential information relating to the design and development of Patent Owner's products." Paper 12, at 5-6. Because Petitioner's Reply to Patent Owner's Response and Exs.1043-1044 includes the same confidential information, good cause exists for sealing these documents.

III. Certification of Non-Publication

On behalf of Petitioner, undersigned counsel certifies the information sought to be sealed by the Motion to Seal has not been published or otherwise made public by Petitioner.

IV. CONCLUSION

For the foregoing reasons, Petitioner respectfully requests the Board grant this motion.

Respectfully submitted,

Date: April 29, 2025

/ Guy Yonay /
Guy Yonay
Registration No. 52,388

CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6(e)(1), the parties have agreed that service may be made electronically. I hereby certify that, pursuant to 37 C.F.R. § 42.6(e), a complete copy of the attached Petitioner's Motion to File Documents Under Seal is being served via electronic mail, on April 29, 2025, the same day as the filing of the above-identified document in the USPTO with the Patent Trial and Appeal Board, to lead and back-up counsel of record for Patent Owner, pursuant to its November 25, 2024 Updated Mandatory Notices, as follows:

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Date: April 29, 2025

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