UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

MONOLITHIC POWER SYSTEMS, INC.,

Petitioner,

v.

GREENTHREAD, LLC,

Patent Owner.

Case No: IPR2024-00468

U.S. Patent No. 8,421,195

PETITIONER'S MOTION TO SEAL
PURSUANT TO 37 C.F.R. §§ 42.14 AND 42.54

Pursuant to 37 C.F.R. §§ 42.14 and 42.54, Petitioner Monolithic Power Systems, Inc. ("Petitioner") respectfully submits this Motion to Seal. Petitioner moves to seal its Response to Motion for Additional Discovery (filed concurrently with the present Motion) in its entirety. Petitioner has conferred with Patent Owner, and Patent Owner indicated it does not oppose.

I. Good Cause Regarding Sealing the Paper Containing Confidential Information

The Office Trial Practice Guide (TPG) 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) 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 C.F.R. § 42.54). Here, there is good cause for sealing Petitioner's Response to Motion for Additional Discovery because Petitioner references Exhibits and Papers filed by Patent Owner under seal.

II. Protective Order

Patent Owner previously requested entry of a modified protective order. Upon entry of that modified protective order, Petitioner designates Petitioner's Response to Motion for Additional Discovery as "PROTECTIVE ORDER MATERIAL." The

Response for which Petitioner seeks to restrict access references Exhibits and Papers filed by Patent Owner under seal and should only be accessible to persons that qualify under Paragraph 4 of the amended Protective Order.

Dated: May 23, 2024

Respectfully submitted,

/Miguel Bombach/

Lead Counsel
Miguel Bombach, Reg. No. 68,636

Back-up Counsel
Bing Ai, Reg. No. 43,312
John D. Esterhay, Reg. No. 73,512
John P. Schnurer, Reg. No. 52,196
Brianna Kadjo, Reg. No. 74,307
Runkun (Justin) Jiang, Reg. No. 78,118

Attorneys for Petitioner

PERKINS COIE LLP
11452 El Camino Real, Ste 300
San Diego, California 92130-2080
858.720.5700 (phone)
858.720.5799 (fax)

CERTIFICATE OF SERVICE

I hereby certify that on May 23, 2024, a true and correct copy of the foregoing MOTION TO SEAL was served by electronic mail on the Patent Owner via its attorneys of record:

Alan Whitehurst; Nicholas T. Matich; Arvind Jairam;
Stuart McCommas; Archis "Neil" Ozarkar
Greenthread-Monolithic-MS@mckoolsmith.com

Respectfully submitted,

Date: May 23, 2024

/Meghan Bright/
Meghan Bright
Paralegal