

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

CASPER SLEEP INC.,
Petitioner,

v.

WERNER MEDIA PARTNERS, LLC,
Patent Owner.

IPR 2024-00474
Patent 10,842,301 B2

**PATENT OWNER'S SECOND UNOPPOSED MOTION TO SEAL
DOCUMENTS PURSUANT TO 37 C.F.R. § 42.14 AND 42.54**

Patent Owner moves to seal the below specific exhibits, to be provided to Petitioner under seal, pursuant to the Board’s October 22, 2024 approval of the protective order filed as Exhibit 2027 (“Protective Order”).

Pursuant to 37 C.F.R. § 42.14, Patent Owner seeks to seal the following Exhibits/Paper, which are being filed contemporaneous with this motion under the Protective Order:

Exhibit/ Paper No.	Description	Reason
31	CONFIDENTIAL Patent Owner’s Sur-Reply to Petitioner’s Reply	Includes confidential material related to at least one of sealed Exhibits 2022–2026, Exhibits 1074-1076, 1078, 1082, and Paper 24 (Reply)
2029	CONFIDENTIAL Deposition Transcript of David Shiroff	Includes confidential material related to at least one of sealed Exhibits 2022–2026, Exhibits 1074-1076, 1078, 1082, and Paper 24 (Reply)
2030	CONFIDENTIAL Andrew Gross Second Declaration	Includes confidential material related to at least one of sealed Exhibits 2022–2026, Exhibits 1074-1076, 1078, 1082, and Paper 24 (Reply)
2033	CONFIDENTIAL Jeff Quinn Second Declaration	Includes confidential material related to at least one of sealed Exhibits 2022–2026, Exhibits 1074-1076, 1078, 1082, and Paper 24 (Reply)

2042	CONFIDENTIAL Marc Werner Declaration	Includes confidential material related to at least one of sealed Exhibits 2022–2026, Exhibits 1074-1076, 1078, 1082, and Paper 24 (Reply)
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Good cause exists to seal the above exhibits as they reference or discuss at least one of the previously sealed exhibits in this IPR.

Patent Owner respectfully requests that the Board grant its request to seal Paper 31 and Exhibits 2029, 2030, 2033, and 2042 under the Protective Order.

This Motion is being filed unopposed after conferral with Petitioner.

December 6, 2024

Respectfully submitted,

Lead Counsel

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CERTIFICATE OF SERVICE

The undersigned certifies that, in accordance with 37 C.F.R. § 42.6(e) and 37 C.F.R. § 42.205, service was made on Petitioner as detailed below.

Date of Service

December 6, 2024

Manner of Service

E-Mail to mkoffsky@koffskyschwalb.com;
gserbin@koffskyschwalb.com

Documents Served

- This Unopposed Second Motion to Seal
- Paper 31 and Exhibits 2029, 2030, 2033, and 2042

Persons Served

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Date: December 6, 2024

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