UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

MONOLITHIC POWER SYSTEMS, INC.,
Petitioner,

v.

GREENTHREAD LLC
Patent Owner

Case: IPR2024-00551
U.S. Patent No. 10,734,481

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 filing a redacted version. Patent Owner has conferred with Petitioner, and Petitioner indicated that it does not oppose.

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 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 filing of the redacted public versions of this paper.

Date: May 9, 2025

Respectfully submitted,

/s/ Alan Whitehurst
Alan Whitehurst
Reg. No. 43,263
awhitehurst@mckoolsmith.com
Arvind Jairam
Reg. No. 62,759
ajairam@mckoolsmith.com
MCKOOL SMITH, P.C.
1717 K St. NW, Suite 1000
Washington, DC 20006
Telephone: (202) 370-8300
Facsimile: (202) 370-8344

Scott W. Hejny
Reg. No. 45,882
shejny@mckoolsmith.com
MCKOOL SMITH, P.C.
300 Crescent Court, Suite 2100
Dallas, TX 75201
Telephone: (214) 978-4000
Facsimile: (214) 978-4044

Archis "Neil" Ozarkar
Reg. No. 71,265
nozarkar@mckoolsmith.com
MCKOOL SMITH, P.C.
600 Travis Street, Suite 600
Houston, TX 77002
Telephone: (713) 485-7300
Facsimile: (713) 485-7344

Counsel for Patent Owner
Greenthread, LLC

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:

Miguel Bombach
Bing Ai
John D. Esterhay
Runkum Jiang
PERKINS COIE LLP
11452 El Camino Real, Ste. 300
San Diego, CA 92130-2080
T: (858) 720-5700

John P. Schnurer
Foley & Lardner LLP
11988 El Camino Real, Suite 400
San Diego, CA 92130
john.schnurer@foley.com

PerkinsServiceMPS-GreenthreadIPR@perkinscoie.com

Dated: May 9, 2025

By: */s/ Alan Whitehurst*
Alan Whitehurst
Reg. No. 43,263

Counsel for Patent Owner
Greenthread, LLC