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: IPR2024-00552

U.S. Patent No. 11,121,222

PETITIONER'S MOTION TO SEAL
OPPOSITION TO PATENT OWNER'S MOTION FOR ADDITIONAL DISCOVERY
PURSUANT TO 37 C.F.R. §§ 42.14 AND 42.54

Pursuant to 37 C.F.R. §§ 42.14 and 42.54 and Paper 19, Petitioner Monolithic Power Systems, Inc. ("Petitioner") respectfully submits this Motion to Seal. Petitioner moves to seal its Opposition to Patent Owner's 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 Opposition to Patent Owner's Motion for Additional Discovery because Petitioner references Exhibits and Papers filed by Patent Owner under seal.

To maintain a complete and understandable file history for public notice purposes, Petitioner also provides a public version that redacts the confidential information.

II. Protective Order

Patent Owner concurrently requests entry of a modified protective order. Upon entry of that modified protective order, Petitioner designates Petitioner's Opposition to Patent Owner's Motion for Additional Discovery as "PROTECTIVE ORDER MATERIAL." The Opposition 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: September 25, 2024

Respectfully submitted,

/Brianna Kadjo/

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CERTIFICATE OF SERVICE

I hereby certify that on September 25, 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
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Respectfully submitted,

Date: September 25, 2024

/Anita Chou/
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Paralegal