UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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TEXAS INSTRUMENTS INC.,
and NXP USA, INC.,
Petitioners

v.

PARKERVISION, INC.,
Patent Owner

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Case IPR2024-00936[1]
Patent 9,118,528

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PETITIONER'S MOTION TO SEAL

[1] NXP USA, Inc., who filed a petition in IPR2024-01068, is joined as petitioner in this proceeding.

Pursuant to 37 C.F.R. § 42.14, this Motion moves to seal Petitioner's Motion to Exclude filed on August 5, 2025 (Paper 45), and Petitioner's Oppositions to Patent Owner's Motion to Exclude filed on August 12, 2025 (Paper 47), both of which were submitted under seal without a motion to seal.

Patent Owner has previously filed a Motion to Seal moving for entry of the Board's Default Protective Order and to seal the Patent Owner's Response to Petition and certain exhibits filed therewith. Paper 20. Petitioner did not oppose Patent Owner's motion, and Petitioner continues to take no position about whether the material submitted by Patent Owner warrants sealing and entry of a protective order.

Nonetheless, because Petitioner's Motion to Exclude filed under seal on August 5, 2025 (Paper 45), and Petitioner's Oppositions to Patent Owner's Motion to Exclude filed under seal on August 12, 2025 (Paper 47) describe and refer to material that Patent Owner moved to seal, Petitioner respectfully submits this Motion to Seal Petitioner's Motion to Exclude filed under seal on August 5, 2025 (Paper 45), and Petitioner's Oppositions to Patent Owner's Motion to Exclude filed under seal on August 12, 2025 (Paper 47), which are now marked confidential and resubmitted with this Motion.

I. DOCUMENTS REQUESTED TO BE SEALED

Petitioner's Motion to Exclude filed under seal on August 5, 2025 (Paper 45), and Petitioner's Oppositions to Patent Owner's Motion to Exclude filed under seal on August 12, 2025 (Paper 47) discuss the material that Patent Owner sought to be sealed and subject to the Default Protective Order in Motion to Seals filed by Patent Owner. Paper 20, (seeking to seal Patent Owner's Response and Exhibits 2010-2016, 2021-2022, 2024, 2027, 2029, and 2036).

II. GOOD CAUSE EXISTS TO SEAL

There is good cause to seal Petitioner's Motion to Exclude filed under seal on August 5, 2025 (Paper 45), and Petitioner's Oppositions to Patent Owner's Motion to Exclude filed under seal on August 12, 2025 (Paper 47) because they refer to and describe material that Patent Owner represented as being its confidential business information in its prior Motion to Seal. Patent Owner's arguments in support of its Motion to Seal apply equally to Petitioner's Motion to Exclude filed under seal on August 5, 2025 (Paper 45), and Petitioner's Oppositions to Patent Owner's Motion to Exclude filed under seal on August 12, 2025 (Paper 47).

III. CERTIFICATION OF NON-PUBLICATION

Patent Owner certified that the information it sought to seal by its previous Motion had not been made publicly available, and Petitioner has no further knowledge of the information at issue being made publicly available.

IV. PROPOSED PROTECTIVE ORDER

Patent Owner previously requested entry of the Default Protective Order. To the extent the Board grants Patent Owner's prior Motion to Seal, Petitioner submits that the material identified in this Motion to Seal should be subject to the same Default Protective order and identified as "PROTECTIVE ORDER MATERIAL."

V. CONCLUSION

For these reasons, Petitioner request sealing Petitioner's Motion to Exclude filed under seal on August 5, 2025 (Paper 45), and Petitioner's Oppositions to Patent Owner's Motion to Exclude filed under seal on August 12, 2025 (Paper 47).

Respectfully submitted,

Dated August 13, 2025

/Yao Wang/

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CERTIFICATE OF SERVICE

Pursuant to 37 CFR §§ 42.6(e)(1) and 42.6(e)(4)(iii), the undersigned certifies that on August 13, 2025, a complete and entire copy of this Petitioner's Motion to Seal and accompanying documents were provided by email to the Patent Owner by serving the email correspondence address of record as follows:

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