

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

ARASHI VISION (U.S.) LLC (D/B/A INSTA360),
Petitioner,

v.

GOPRO, INC.,
Patent Owner.

Patent No. 10,015,413

Inter Partes Review No. IPR2024-00984

PETITIONER'S MOTION TO SEAL

Pursuant to 37 C.F.R. §§ 42.14 and 42.54, Petitioner Arashi Vision (U.S.) LLC (d/b/a Insta360) submits this Motion to Seal Petitioner's Reply and certain exhibits thereto, all of which are being concurrently filed with this Motion. The Board entered the parties' proposed Protective Order (Ex. 2051). (Paper 12.)

I. GOOD CAUSE EXISTS FOR SEALING THE EXHIBITS CONTAINING CONFIDENTIAL INFORMATION

Confidential information is protected against public disclosure. 35 U.S.C. § 316(a)(7); 37 C.F.R. § 42.54. Petitioner submits that Petitioner's Reply, the Katsaggelos Reply Declaration (Ex. 1014), and Exhibit 1039 contains Patent Owner's highly confidential information, the disclosure of which is likely to significantly harm Patent Owner's competitive position.

Petitioner's Reply and the Katsaggelos Reply Declaration (Ex. 1014) cite, describe, and quote Exhibit 1039, which was part of the closed, confidential session of the related ITC hearing. This Exhibits is therefore designated as "Confidential Business Information Subject to Protective Order" and is subject to the applicable Protective Order in the related ITC litigation. This Exhibit should be similarly protected here. This Exhibits contains highly confidential and non-public information concerning technical, source code, business, financial, and strategy information of Patent Owner, the disclosure of which is likely to significantly harm Patent Owner's competitive position. Petitioner provides good cause reasons below for sealing each of the listed Exhibits.

Exhibit	Good Cause for Filing Under Seal
1039	Testimony from Pablo Lema in Inv. 337-TA-1400, including testimony during the closed, confidential session.

Exhibit 1039 therefore qualifies for protective order protection. Under the entered Protective Order (Ex. 2051), these Exhibits qualify for PROTECTIVE ORDER MATERIAL – ATTORNEYS’ EYES ONLY protection. The portions of Petitioners’ Reply and the Katsaggelos Reply Declaration (Ex. 1014) that describe or quote this Exhibit likewise qualifies for the same protection.

Thus, Petitioner’s Reply, the Katsaggelos Reply Declaration, and Exhibit 1039 should be sealed under 37 C.F.R. § 42.54. Petitioner is filing a redacted version of its Reply to the public docket.

II. CERTIFICATION OF NON-PUBLICATION

To the best of Petitioner’s knowledge, the information sought to be sealed by this Motion has not been published or otherwise made publicly available.

III. CERTIFICATION OF MEET AND CONFER

Pursuant to 37 C.F.R. § 42.54, Petitioner certifies that it has conferred with Patent Owner, and Patent Owner does not oppose sealing Exhibit 1039.

IV. CONCLUSION

For the foregoing reasons, Petition respectfully requests that the Board seal and protect the highly confidential information contained in Petitioner’s Reply, the Katsaggelos Reply Declaration (Ex. 1014), and Exhibit 1039.

Dated: July 14, 2025

Respectfully submitted,

By: /s/ Alex S. Yap

Alex S. Yap

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Certificate of Service (37 C.F.R. § 42.6(e)(4))

I hereby certify that the attached PETITIONER’S MOTION TO SEAL was served as of the below date on the Patent Owner via email (by agreement) to the following counsel of record:

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Dated: July 14, 2025

/s/ Alex S. Yap
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