

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. 11,336,832

Inter Partes Review No. IPR2024-01052

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).

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 Supplemental Declaration (Ex. 1019), and Exhibits 1022, 1023, 1024, 1025, 1026, and 1027 contain Petitioner's and Patent Owner's highly confidential information, the disclosure of which is likely to significantly harm Petitioner's and Patent Owner's competitive position.

Petitioner's Reply and the Katsaggelos Supplemental Declaration (Ex. 1019) cite, describe, and quote Exhibits 1022, 1023, 1024, 1025, 1026, and 1027, which were part of depositions, the closed, confidential session of the related ITC hearing, or the Initial Determination on Violation of Section 337 in the related ITC investigation. These Exhibits are therefore designated as "Confidential Business Information Subject to Protective Order" and are subject to the applicable Protective Order in the related ITC litigation. These Exhibits should be similarly protected here. These Exhibits contain highly confidential and non-public information concerning technical, source code, business, financial, and strategy

information of Petitioner and Patent Owner, the disclosure of which is likely to significantly harm Petitioner's and 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
1022	Excerpts of Deposition Transcript of Pablo Lema dated September 11, 2024 in Inv. 337-TA-1400.
1023	Excerpts of Deposition Transcript of Wenjie Jiang dated October 23, 2024 in Inv. 337-TA-1400.
1024	Excerpts of Deposition Transcript of Biao Sang dated October 1, 2024 in Inv. 337-TA-1400.
1025	Excerpted Testimony from Pablo Lema in Inv. 337-TA-1400, including testimony during the closed, confidential session.
1026	Excerpts of Deposition Transcript of Daryl Stimm dated September 13, 2024 in Inv. 337-TA-1400.
1027	Excerpts of Initial Determination on Violation of Section 337 in Inv. 337-TA-1400

Exhibits 1022, 1023, 1024, 1025, 1026, and 1027 therefore qualify 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 Supplemental Declaration (Ex. 1019) that describe or quote these Exhibits likewise qualify for the same protection.

Thus, Petitioner's Reply, the Katsaggelos Supplemental Declaration, and Exhibits 1022, 1023, 1024, 1025, 1026, and 1027 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 Exhibits 1022, 1023, 1024, 1025, 1026, and 1027.

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 Supplemental Declaration (Ex. 1019), and Exhibits 1022, 1023, 1024, 1025, 1026, and 1027.

Dated: July 14, 2025

Respectfully submitted,

By: /s/ Lily Yue Li

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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/ Yue Lily Li

Yue Lily Li