

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 DEMONSTRATIVES

Pursuant to 37 C.F.R. §§ 42.14 and 42.54, Petitioner Arashi Vision (U.S.) LLC (d/b/a Insta360) respectfully submits this Motion to Seal Petitioner's Oral Argument Demonstratives. The Board enter the entered the parties' proposed Protective Order (Ex. 2051). (Paper 9.)

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 the Oral Argument Demonstratives 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.

Thus, Petitioner's Oral Argument Demonstratives should be sealed under 37 C.F.R. § 42.54. Petitioner is filing a redacted version of its Oral Argument Demonstratives 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 the demonstratives.

IV. CONCLUSION

For the foregoing reasons, Petition respectfully requests that the Board seal and protect the confidential information contained in Petitioner's Oral Argument Demonstratives for the duration of this proceeding (and thereafter). Petitioner further requests that the Board provisionally seal and protect the confidential information until such time as it receives and rules on this Motion.

Dated: October 3, 2025

Respectfully submitted,

By: /s/ Yunan Yuan
Yunan Yuan, Reg. No.: 73,637
MORRISON & FOERSTER LLP
755 Page Mill Road
Palo Alto, CA 94304-1018
Email: AYuan@mofo.com
Tel: (650) 813-4083

Counsel for Petitioner

CERTIFICATE OF SERVICE (37 C.F.R. § 42.6(e)(4))

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

James M. Glass, Registration No. 46,729
John T. McKee, Registration No. 65,926
Quincy Lu, Registration No. 76,954
Patrick Schmidt (*pro hac vice*)
Nima Hefazi, Registration No. 63,658
Quinn Emanuel Urquhart & Sullivan LLP
Email: jimglass@quinnemanuel.com
Email: johnmckee@quinnemanuel.com
Email: quincylu@quinnemanuel.com
Email: patrickschmidt@quinnemanuel.com
Email: nimahefazi@quinnemanuel.com

Dated: October 3, 2025

/s/ Yunan Yuan

Yunan Yuan