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

Case No. IPR2024-01165
U.S. Patent No. 10,958,840

PATENT OWNER'S MOTION TO SEAL

Under 37 CFR §§ 42.14 and 42.54, Patent Owner GoPro, Inc. submits this Motion to Seal its Demonstratives. The parties previously filed a proposed Protective Order that the parties have stipulated to, both a redline over the default Protective Order (EX2050) and a clean version (EX2051). The parties had also previously filed a Motion to Seal requesting entry of the proposed Protective Order.

I. GOOD CAUSE EXISTS FOR SEALING

The Office Patent Trial Practice Guide provides that "the rules aim to strike a balance between the public's interest in maintaining a complete and understandable file history and the parties' interest in protecting truly sensitive information." 77 Fed. Reg. 48,756, 48,760 (Aug. 14, 2012). Those rules "identify confidential information in a manner consistent with Federal Rule of Civil Procedure 26(c)(1)(G), which provides for protective orders for trade secret or other confidential research, development, or commercial information." *Id*. (citing 37 C.F.R. §42.54).

Patent Owner's Demonstratives cite and describe portions of GoPro's confidential information and technical documents, including source code, produced by GoPro in related ITC litigation within the exhibit list. The information was designated in the ITC litigation as "Confidential Business Information Subject to Protective Order," "Confidential Business Information – Source Code – Subject to Protective Order," and is subject to the applicable Protective Order from the parallel litigation and should be similarly protected here. The materials Patent Owner is seeking to redact

are the same materials Patent Owner redacted in prior filing it has made on the public docket in this proceeding and are the subject of Patent Owner's prior motions to seal. Patent Owner's request to seal is narrow and targeted only to this information which Patent Owner does not intend to make public. Thus, Patent Owner's Demonstratives should be sealed under 37 C.F.R. § 42.54. Patent Owner is filing a redacted version of its Demonstratives to the public docket.

II. CERTIFICATION OF NON-PUBLICATION

To the best of Patent Owner'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 CFR §42.54, Patent Owner certifies that it has conferred with Petitioner and Petitioner does not oppose sealing of the confidential information in Patent Owner's Demonstratives.

IV. CONCLUSION

Patent Owner respectfully requests that the Board seal and protect the confidential information contained in Patent Owner's Demonstratives.

Date: October 21, 2025

By: /James M. Glass/
James M. Glass (Reg. No. 46,729)
Lead Counsel for Patent Owner

CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6(e), the undersigned certifies that on October 21, 2025, a complete and entire copy of the above document was provided by email to Petitioner by serving correspondence addresses of record as follows:

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Dated: October 21, 2025

/James M. Glass/
James M. Glass (Reg. No. 46,729)
Lead Counsel for Patent Owner