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. 10,574,894

Inter Partes Review No. IPR2024-01186

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 has yet to issue an order regarding Patent Owner's motion to seal (Paper 8) and proposed Protective Order (EX2051).

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 (EX1017), and Exhibits 1019 and 1020, which were part of depositions, and Exhibit 1022, which is a confidential document of the Patent Owner's. These Exhibits were produced in the related ITC proceeding and 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/or 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
1019	Deposition Transcript of Thomas Derbanne, October 1, 2024.
1020	Deposition Transcript of Pablo Lema, September 11, 2024
1022	GoPro internal development documentation (including original French version, certified translated version, and translation certification) (GOPRO_00183699)

Exhibits 1019, 1020, and 1022 therefore qualify for protective order protection. Under the entered Protective Order (EX2051), these Exhibits qualify for PROTECTIVE ORDER MATERIAL – ATTORNEYS' EYES ONLY protection. The portions of Petitioner's Reply and the Katsaggelos Supplemental Declaration (EX1017) that describe or quote these Exhibits likewise qualify for the same protection.

Thus, Petitioner's Reply, the Katsaggelos Supplemental Declaration, and Exhibits 1019, 1020, and 1022 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 1019, 1020, and 1022.

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 (EX1017), and Exhibits 1019, 1020, and 1022.

Dated: July 18, 2025

Respectfully submitted,

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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 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 18, 2025

/s/ Yue Lily Li
Yue Lily Li