Filed: June 23, 2025

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

AVANOS MEDICAL, INC.,

Petitioner,

v.

STRATUS MEDICAL, LLC,

Patent Owner.

Case IPR2024-01211
Patent 10,736,688

PETITIONER'S OPPOSITION TO PATENT OWNER'S MOTION TO SEAL

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PETITIONER'S UPDATED EXHIBIT LIST

Exhibit No.	Description
1001	U.S. Patent No. 10,966,782 to Wright et al. (issued April 6, 2021) ("'782 Patent")
1002	U.S. Patent No. 10,736,688 to Wright et al. (issued August 11, 2020) ("'688 Patent")
1003	U.S. Patent No. 10,925,664 to Wright et al. (issued February 23, 2021) ("'664 Patent")
1004	U.S. Patent No. 11,806,070 to Wright et al. (issued November 7, 2023) ("'070 Patent")
1005	U.S. Patent No. 10,716,618 to Wright et al. (issued July 21, 2020) ("'618 Patent")
1006	The Complete File History of the '782 Patent, U.S. Patent App. No. 16/933,811 (filed July 20, 2020) (the '811 application)
1007	The Complete File History of the '688 Patent, U.S. Patent App. No. 15/098,673 (filed April 14, 2016) (the '673 application)
1008	The Complete File History of the '664 Patent, U.S. Patent App. No. 16/933,995 (filed July 20, 2020) (the '995 application)
1009	U.S. Patent No. 6,146,380 to Racz et al. (issued November 14, 2000) ("Racz")
1010	U.S. Publication No. 2007/0016183 to Lee et al. (published January 18, 2007) ("Lee")
1011	U.S. Publication No. 2005/0059964 to Fitz (published March 15, 2005) ("Fitz")
1012	U.S. Publication No. 2006/0084965 to Young (published April 20, 2006) ("Young '965")
1013	U.S. Publication No. 2007/0260223 to Scheibe et al. (published November 8, 2007) ("Scheibe")
1014	U.S. Patent No. 7,976,542 to Cosman et al. (filed on March 2, 2006 and issued on July 12, 2011) ("Cosman '542)
1015	U.S. Publication No. 2007/0027449 to Godara et al. (published on February 1, 2007) ("Godara")
1016	U.S. Publication No. 2009/0112201 to Young (published April 30, 2009) ("Young '201")

Exhibit No.	Description
1017	U.S. Patent No. 6,652,516 to Gough (filed November 19, 1999 and issued on November 25, 2003) ("Gough '516").
1018	U.S. Patent No. 5,728,143 to Gough (filed February 14, 1996 and issued on March 17, 1998) ("Gough '143")
1019	Cohen et al., Randomized Placebo-controlled Study Evaluating Lateral Branch Radiofrequency Denervation for Sacroiliac Joint Pain, Anesthesiology, Vol. 109, Issue 2, 279-288 (2008) ("Cohen")
1020	U.S. Patent No. 6,551,302 to Rosinko (filed on October 26, 2000 and issued on April 22, 2003) ("Rosinko")
1021	U.S. Patent No. 5,855,576 to LeVeen et al. (filed on December 12, 1996 and issued on January 5, 1999) ("LeVeen")
1022	U.S. Patent No. 7,918,852 to Tullis et al. (filed May 1, 2006 and published January 18, 2007) ("Tullis")
1023	U.S. Patent No. 4,411,266 to Cosman (issued October 25, 1983) ("Cosman '266")
1024	U.S. Patent No. 7,195,629 to Behl et al. (filed August 18, 2003 and issued March 27, 2007) ("Behl")
1025	U.S. Patent No. 5,782,827 to Gough et al. (filed December 19, 1995 and issued July 21, 1998) ("Gough '827")
1026	U.S. Patent No. 5,928,229 to Gough et al. (filed October 30, 1997 and issued July 27, 1999) ("Gough '229")
1027	U.S. Patent No. 9,078,678 to Zerfas et al. (filed March 21, 2013 and issued July 14, 2015) ("Zerfas")
1028	U.S. Patent App. Pub. No. 2007/0203486 to Young (published August 30, 2007) ("Young '486")
1029	U.S. Patent App. Pub. No. 2005/0159797 to Chandran et al. (published July 21, 2005) ("Chandran")
1030	U.S. Patent App. Pub. No. 2008/0269774 to Garcia et al. (published October 30, 2008) ("Garcia")
1031	Reserved
1032	Reserved
1033	Declaration of Dr. Robert D. Tucker (July 26, 2024)

Exhibit No.	Description
1034	Reserved
1035	CV of Robert D. Tucker, Ph.D., M.D.
1036	Reserved
1037	Highlighted version of Stratus Exhibit 2015 (confidential designated version of Jorgensen Declaration) **PROTECTIVE ORDER MATERIAL—OUTSIDE COUNSEL ONLY** (based on Stratus's designation)
1038	Stratus Press Release dated Aug. 8, 2019, *available at* https://stratusmedical.com/2019/08/09/med-venture-holdings-announces-new-ceo-appointment-for-nimbus/
1039	Stratus Press Release dated Jan. 15, 2020, *available at* https://stratusmedical.com/2020/01/15/stratus-medical-completes-private-placement-financing-and-acquisition-of-the-nimbusrf-business-for-expansion-in-the-interventional-pain-medicine-space/
1040	Stratus "Clinical References," *available at* https://stratusmedical.com/clinical-compendium/
1041	Stratus "2023 Product Catalog," *available at* https://stratusmedical.com/product-catalog/

Petitioner Avanos Medical, Inc. (Avanos or Petitioner) files this opposition to Patent Owner Stratus Medical, LLC's (Stratus or Patent Owner) Motion to Seal. There are four pending IPR proceedings between these parties, IPR2024-01209 through -01212, and the identical motion and exhibits are at issue in each one. Avanos submits an identical copy of this brief in each proceeding (other than case style and headers). Avanos provides the following table to correlate papers and their numbers for each proceeding:

Proceeding	Paper Title	Paper No.	Abbreviation
IPR2024-01209	Patent Owner Response (Confidential)	Paper 13	1209 POR
	Patent Owner Response (Public Redacted)	Paper 14	
	Motion to Seal	Paper 16	Mot. to Seal
IPR2024-01210	Patent Owner Response (Confidential)	Paper 15	1210 POR
	Patent Owner (Public Redacted)		
	Motion to Seal	Paper 18	Mot. to Seal
IPR2024-01211	Patent Owner Response (Confidential)	Paper 15	1211 POR
	Patent Owner Response (Public Redacted)		
	Motion to Seal	Paper 18	Mot. to Seal
IPR2024-01212	Patent Owner Response (Confidential)	Paper 13	1212 POR
	Patent Owner Response (Public Redacted)		
	Motion to Seal	Paper 16	Mot. to Seal
All	Jorgensen Decl. (Confidential)	Ex-2015	
	Jorgensen Decl. (Redacted Public)	Ex-2016	

I. INTRODUCTION

Stratus's motion to seal Exhibit 2015 (the declaration of Mr. Jorgensen) and the corresponding portions of its Patent Owner Responses should be denied. The motion broadly asserts that many paragraphs of Mr. Jorgensen's testimony contain information that Stratus "wishes" to keep confidential. Yet these assertions of supposed confidentiality are overgeneralized and under-supported in the motion. Stratus does not adequately explain the sources of the redacted information or explain why the redacted information is, in fact, confidential.

While Stratus claims that "it is believed" that none of the redacted information at issue is public, its own evidence shows that much of the redacted information is *unquestionably* public. Stratus asks both Avanos and the Board to simply take their word for it that the information at issue is "truly confidential" based on unsupported and generalized assertions. Moreover, the false premise of Stratus's motion to seal—that it believes none of the redacted information is public, when some plainly is—calls into question its unsupported claims of confidentiality as to the rest of the redacted information. In other instances, the Jorgensen testimony Stratus seeks to seal consists of self-serving opinions and characterizations that do not qualify as confidential facts subject to being filed under seal. Stratus has not met its burden to show any of the redacted information

warrants sealing—much less the stringent protections of an "outside counsel only" designation, which it applies to *all* the redacted information.

II. BACKGROUND

On May 23, Stratus filed its Patent Owner Responses in the four IPRs. The Responses each argued that objective indicia of nonobviousness support the patentability of its claims, so Stratus submitted supporting testimony from Mr. Jorgensen (its Director of Marketing). As stated in the motion to seal, that testimony includes "manufacturing, marketing, and sales data for the Nimbus device, sales data for the devices of its competitors, and their [the competitors'] relative positions in the market." Mot. to Seal at 1. Without discussing any of those categories specifically, Stratus's motion to seal lumped them into a single, defined term: "Sales and Maret Share Data." *Id.*

A highlighted copy of Mr. Jorgensen's testimony is provided as Ex-1037 to illustrate (in **pink**) the specific portions of his testimony that Stratus claims are confidential and has redacted from the public version (Ex-2016). For example, Mr. Jorgensen cites and testifies about a "chart" purporting to "depict[] Stratus's total U.S. revenue" from 2020 to 2024. Ex-1037 (and Ex-2015, Ex-2016) ¶¶ 13–15. He then compares that revenue to the "annual growth rate" of the "U.S. market in which Stratus competes," citing data and other "diagram[s]" or "chart[s]" purporting to explain the relative performance of Stratus as compared to other

"market participants." *Id.* ¶¶ 16–26. Within these paragraphs, Mr. Jorgensen makes several statements expressing his opinions about what the illustrations purport to show. *E.g.*, *id.* ¶¶ 14 (second line), 15, 16 (second to last line), 17 (last two sentences), 20 (first highlight/redaction), 22 (most of paragraph), 24 (first sentence), etc. Mr. Jorgensen also makes statements relating to the situs of the Nimbus device's development and marketing, *id.* ¶¶ 12, 28–30. Stratus then cites this information in support of its commercial success arguments in the Patent Owner Responses. *E.g.*, 1209 POR 17–18, 69–73.

In its motion to seal, Stratus merges *all* this information (and more)—spread across several paragraphs and sections of Mr. Jorgensen's testimony—into its termed "Sales and Maret Share Data." Mot. to Seal at 1. Stratus argues all this information is "truly confidential" because (1) Stratus is "a private company," (2) it is "not obligated to disclose" the generalized "Sales and Market Share Data," (3) it "wishes to keep that data confidential," and (4) "it is believed" that all the information has "not been published or otherwise made public." Stratus asserts it would suffer a "concrete harm … by giving the public detailed financial data that a competitor or others could use to gain an unfair advantage over Stratus. *Id.* at 3. As to the balance of the public interest, Stratus contends it is an "involuntary participant" in this case, so it shouldn't be "forced to reveal" the "internal business

information" to defend its patents and it has revealed "as much as possible" to the public. *Id.* at 4.[1]

Notably, neither Stratus nor Mr. Jorgensen explain the *source* of any of the allegedly confidential information or data. Other than a single, vague reference to "internal business information" (*id*. at 4), there is no assertion that the redacted information is Stratus's data, rather than some other party's. Plainly, however, *not all* the claimed information originated from within Stratus's walls because much of it relates to *third parties* and their activities within the relevant market. *See, e.g.*, Ex-1037 (and Ex-2016) ¶¶ 17 (highlighted version of Jorgensen testimony, citing one public exhibit and describing a redacted diagram of "market shares" of other market participants), 19–20 (testifying about chart purportedly showing "comparisons" of market participants' positions within the market, as well as "the size of each company's salesforce"). Moreover, as noted above and discussed herein, much of the redacted information is plainly public information.

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[1] Stratus's suggestion that it is an "involuntary" participant rings hollow given that it voluntarily sought the "grant of a public franchise" (the patents at issue that are being reconsidered in these IPRs), *Oil States Energy Servs., LLC v. Greene's Energy Grp., LLC*, 584 U.S. 325, 334 (2018), and it has since sued Petitioner for infringement. *E.g.*, Ex-2015 ¶ 43; 1209 POR 17–18.

III. LEGAL STANDARD

There is a strong public policy that favors making information filed in IPR proceedings open to the public. *See Garmin Int'l v. Cuozzo Speed Techs., LLC*, IPR2012-00001, Paper 34 (PTAB March 14, 2013) (discussing the standards of the Board applied to motions to seal). The standard for granting a motion to seal is "for good cause." 37 C.F.R. §§ 42.20(c), 42.54(a). In determining whether good cause has been shown, the Board considers, among other things, whether the information sought to be sealed is truly confidential and whether the expressed interest in maintaining confidentiality outweighs the strong public interest in an open record. *Argentum Pharm. LLC v. Alcon Rsch., Ltd.*, IPR2017-01053, Paper 27 at 2–3 (PTAB Jan. 19, 2018) (informative); *see also Garmin*, Paper 34 at 2–3. Further, "confidential information" is defined consistent with Fed. R. Civ. P. 26(c)(1)(G), which provides for protective orders for "trade secret or other confidential research, development, or commercial information." 37 C.F.R. §§ 42.2, 42.54(a)(7); Trail Practice Guide § I.E.2. The standard for granting a motion to seal is "heightened" where the movant designates information under the "Outside Counsel Only" category, which is reserved for information "so commercially sensitive that its dissemination deserves *even further* limitation" than the default tier of protection. Proposed Protective Order, Ex-2017 ¶ 4; *Western Digital Corp. v. Kuster*, IPR2020-01391, Paper 28, 3 (PTAB Aug. 19, 2021).

IV. ARGUMENT

A. Stratus has not met its burden to show the redacted information should be sealed

The only bases Stratus presents to seal the variety of information redacted from the Jorgensen testimony (and its Responses) are that Stratus is a "private" company, that it is "not obligated to disclose" the information, and that it "believe[s]" that the information is not public and "wishes" to keep it that way. This conclusory and generalized treatment of disparate information—lumped together as "Sales and Marketing Data"—does not carry Stratus's burden to show the redacted information is confidential, much less good cause to seal it in view of the "default rule … that all papers … are open and available for access by the public." *Garmin*, Paper 34, 2.

As explained in *Argentum*, "'[g]ood cause' for sealing is established by a sufficient *explanation as to why* the information sought to be sealed is confidential information," and the movant "must *demonstrate adequately* that … the information sought to be sealed is *truly confidential*." IPR2017-01053, Paper 27, 3 (cleaned up, emphasis added); *see also Garmin*, IPR2012-00001, Paper 34, 3 (denying motion to seal where movant did "not present[] a sufficient explanation as to *why*" the information "is confidential" and had not "even represented that the information sought to be sealed *constitutes* confidential information" (emphasis added)).

Here, Stratus has baldly asserted that the redacted information is "truly confidential" without explaining why it is so. Stratus contends it is "not obligated to disclose" the information, but that gets the issue backwards. The correct question is whether there are restrictions or other reasons that would justify *not* disclosing the information that Stratus chose to introduce in this public proceeding to support its arguments. Without any explanation for the basis of why the redacted information is or should remain confidential, there is not good cause for the Board to seal it. *E.g.*, *Duration Media LLC v. Rich Media Club LLC*, IPR2023-00953, Paper 72, 6 (PTAB Aug. 8, 2024) (merely stating that the exhibits contained "Patent Owner's confidential revenue information" where it "does not explain why" is "insufficient to establish good cause").

In fact, it is unclear from the Jorgensen testimony and the motion what the actual *source* is for much of the data Stratus seeks to seal. On the one hand, there is the "sales" data presented in Ex-1037 (Ex-2015) ¶¶ 14–15. While it seems plausible that a "private company" like Status would not allow publication of its overall company revenue, the confidentiality of this information is not axiomatic. Neither Stratus nor Mr. Jorgensen confirm where the redacted "sales" data was obtained or whether the source of the data is confidential.

The confidentiality of the described "market" data—generally presented in chart form in Paragraphs 17–26 (and statements and opinions about it)—is much

less plausible. Those charts and testimony purport to summarize *third parties'* activities in the relevant market, which implies the redacted information was derived from some source besides Stratus (at least in part). For example, Stratus itself is an unlikely source for data about the "size of each [third-party] company's salesforce," as Mr. Jorgensen describes in his public testimony. Ex-2016 ¶ 19 (public testimony); Ex-1037 ¶¶ 19–20 (additional details in confidential version). And, like the Patent Owner in *Argentum*, Stratus "asserts no ownership interest in [that] information," and Stratus "advances no other information sufficient to show that [Stratus] is competent to establish that the exhibits reflect truly confidential information" (or that Stratus is "competent to address any harm that would inure to the owners of the information"). *Argentum*, at 5; *see also MOM Enters., LLC v. Vieth*, IPR2023-00729, Paper 112, 98–99 (PTAB Sept. 10, 2024) (denying motion to seal as to certain "market share information" because Patent Owner did not "sufficiently establish[] the confidentiality of the particular statements sought to be redacted"). Without any explanation of where this information comes from or whether there are any restrictions on its use, Stratus cannot establish good cause to seal.[2]

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[2] Avanos objected to the subject testimony (among others) as inadmissible hearsay and outside Mr. Jorgensen's personal knowledge under Fed. R. Evid. 802 and 602

B. Some information is already public and does not qualify to be sealed

Stratus states that "it is believed" that the "Sales and Market Share Data" has "not been published or otherwise made public." Mot. to Seal 3. This 5-word generalization of *all* redacted information is (i) insufficient to satisfy Stratus' burden, as discussed above, and (ii) demonstrably *false* with respect to certain redacted information.

Stratus publicly touts on its website that its Nimbus device has been manufactured in the United States. Ex-1040, 1, 3, 4 (2013 and 2015 statements that "[i]t is manufactured by Nimbus Concepts, LLC in Austin, Texas); Ex-1039, 1 (stating in 2020 press release that Nimbus "is manufactured" in "Salt Lake City, UT"). A 2019 press release on Stratus's website proclaims that the team wanted to "replicat[e] the great success" and "good progress" they had "in Australia and Brazil," and that they planned to "expand in the US" to try to "capture the significant market opportunity in the US and other countries." Ex-1038, 1.[3] Yet

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because he was plainly testifying about information contained in unidentified documents rather than his "personal knowledge." *E.g.*, 1209 POR, 4–5.

[3] *See also* Ex-2016 ¶ 43 (Jorgensen noting Australian litigation over related patents); 1209 POR, 14 (describing same Australian litigation).

Stratus now contends the location of the Nimbus's manufacture and initial market attempts are confidential. Ex-1037 (Ex-2015) ¶¶ 12, 28, 30.

In another example, Mr. Jorgensen publicly testifies that that "Stratus Medical grew 212% during [a] three-year period" and that such growth was "attributable to physician adoption of the Nimbus device," *id.* ¶ 54, repeating statements from a 2024 Stratus press release, Ex-2025, 1 ("Stratus Medical grew 212% during the three-year period evaluated. Stratus Medical's CEO, Bret Boudousquie, attributes Stratus' growth to physician adoption of the NIMBUS®…")). But in these proceedings, Stratus seeks to seal various statements in Mr. Jorgensen's testimony that express the same sentiments about Stratus's growth and the alleged reason for it. Ex-1037 (Ex-2015) ¶¶ 14–15, 30.

A significant portion of Mr. Jorgensen's testimony about the alleged commercial success naturally relates to the "market in which Stratus competes." Ex-2016 ¶ 16. In public, Stratus touts it was "created to focus on advancing *radiofrequency (RF) ablation* treatment." Ex-1039, 1 (emphasis added); *see also* Ex-1040, 1 (Stratus "clinical references" including article about "Radiofrequency Ablation"), 7 (poster by inventor of challenged patents referring to "Radiofrequency ablation (RFA) practices"). And the features of its device are not secret, either. Ex-2016 ¶¶ 7, 27, 33–35 (Jorgensen testifying publicly that the Nimbus "uses radiofrequency [RF] energy to ablate nerves" and describing how an

RF probe is "into the cannula and provides RF energy to the tip"); Ex-1041 (publicly available Stratus product catalog, including Nimbus device). But contradictorily, Stratus seeks to *seal* Mr. Jorgensen's shorthand characterization of "the market in which Stratus competes" in numerous parts of his testimony. Ex-1037 (Ex-2016) ¶¶ 16–17, 19, 21, 24–25, 27, 47 (using same supposedly confidential identifier).

Finally, one Stratus exhibit is a web page that purports to list "[t]he 10 largest medical device companies." Ex-2027. Nevertheless, Stratus has designated as confidential Mr. Jorgensen's testimony *repeating* certain information from that public list exhibit. Ex-1037 ¶ 17 (citing Ex-2027, 2). Stratus's claim that such a statement is confidential—or even that "it is believed" that it has not been made public—is frivolous.

Plainly, there is no "good cause" to seal information that is public. And Stratus's professed "belie[f]" that none of the generalized "Sales and Market Share Data" has been published is not only false, but as shown here, Stratus itself has publicized some of the statements identified here. *Cf. MOM Enters.*, IPR2023-00729, Paper 112, at 98–99 (directing Patent Owner to "reevaluate" certain redactions "in light of other information that is publicly available on the docket"). The false premise of Stratus's claim for confidentiality thus casts doubt on *all* of Stratus's wholly generalized claims of confidentiality and supposed harm from

disclosure—the entire argument of which consists of a single, undifferentiated statement in its motion to seal.

C. Mr. Jorgensen's opinions are not confidential information

Finally, Stratus improperly attempts to seal various self-serving opinions and characterizations by Mr. Jorgensen of the purportedly confidential information. In *In re Violation of Rule 28(D)*, 635 F.3d 1352 (Fed. Cir. 2011), the Federal Circuit explained that the protections of Fed. R. Civ. P. 26(c)(1)(G) are "limited to commercial information that has competitive significance," and it held that legal arguments in an appellate brief could not be marked confidential and shielded from public view "unless the argument discloses facts or figures of genuine competitive or commercial significance." *Id.* at 1360.

Many of the highlighted portions of Mr. Jorgensen' testimony, which Stratus has redacted, are argumentative statements and opinions that contain no "facts or figures" and have no "competitive or commercial significance." In one example, Mr. Jorgensen invokes an analogy to marine animals to characterize various participants in the market. Ex-1037 (and Ex-2015, Ex-2016) ¶ 17. In another, he invokes several argumentative adverbs to heap praise on his company while minimizing the performance of others. *Id.* ¶ 22. And Stratus even attempts to seal Mr. Jorgensen's (again somewhat colorful) self-serving praise of his own product. *Id.* ¶ 27.

Importantly, none of this puffery includes any concrete facts—they are statements of opinion only. And these are not the only examples. *E.g.*, *id.* ¶¶ 14, 15 (last sentence), 16 (second to last line), 17, 20 (first highlight/redaction), 21, 23–26.

It is inappropriate to seal this argumentative testimony because it does not qualify as the kind of information subject to sealing under either of Fed. R. Civ. P. 26(c)(1)(G). Even more, these opinions do not meet any of the categories (or examples of them) that qualify for the more restrictive designation of "OUTSIDE COUNSEL ONLY" material under the Protective Order. Ex-2017 ¶ 4. These improper designations hamper Avanos's ability to effectively cross-examine Mr. Jorgensen on these statements and present the material to the Board. They should be denied.

V. CONCLUSION

As shown in this opposition, Stratus's conclusory and generalized argument does not carry its burden to show all the designated portions of Mr. Jorgensen's testimony and the Patent Owner Responses are actually confidential, much any "concrete" harms that would follow from disclosing the information. Stratus has not even shown that the information is, in fact, its own. And Stratus's improper attempts to seal public information and self-serving opinions of its witness further undercut the claimed bases to keep the testimony under seal. At the very least,

Stratus's over-designation of information as confidential exhibits a lack of diligence to abide by the Board's rules and precedent. Petitioner requests that the Board deny Patent Owner's motion to seal.

Respectfully submitted,

/Christopher B. Kelly/

Christopher B. Kelly (Reg. No. 62,573)
Lead Counsel for Petitioner

CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. §§ 42.6(e) and agreement of the parties, I certify that on June 23, 2025, copies of this paper and all accompanying exhibits were served on counsel for the Patent Owner by email to:

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