UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

GOOGLE LLC and MOTOROLA MOBILITY LLC,
Petitioner,

v.

MULTIFOLD INTERNATIONAL INCORPORATED PTE. LTD.,
Patent Owner.

Case IPR2025-00058
Patent No. 9,158,494

PETITIONERS' MOTION TO SEAL

Pursuant to 37 C.F.R. § 42.54, Petitioners hereby move to seal the answer to one question in the transcript of Ronald Cassar's deposition (EX1020). Good cause exists for granting this motion because the information is Mr. Cassar's salary, which he considers confidential, and Mr. Cassar's counsel (who also serves as Patent Owner's counsel) has requested to maintain the confidentiality of that information. Petitioners, the moving parties, certify that they have in good faith conferred with Patent Owner and there is no dispute over sealing this limited information. Consistent with Patent Owner's prior motion to seal (Paper 7), Petitioners request entry of the PTAB's default protective order.

I. GOOD CAUSE EXISTS FOR SEALING A PORTION OF EXHIBIT 1020

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." Consolidated Trial Practice Guide, 19. Further, 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).

In accordance with the rules and procedures, Petitioners move to seal EX1020 and have publicly filed a redacted version of that document.

Petitioners' EX1020 is the transcript of Ronald Cassar's November 21, 2025 deposition. At page 35, lines 8-10 of the transcript, Mr. Cassar states his salary. Mr. Cassar's counsel (who also serves as Patent Owner's counsel) has represented that Mr. Cassar considers his personal salary to be confidential. The parties have conferred on and agreed to the redactions. Accordingly, good cause exists for entry of the Default Protective Order and sealing of this limited information.

II. CONCLUSION

For the reasons set forth above, Petitioners respectfully request that the identified portion of EX1020 be placed under seal.

Respectfully submitted,

Dated: December 5, 2025

By: /Naveen Modi/
Naveen Modi (Reg. No. 46,224)
Counsel for Petitioner Google

CERTIFICATE OF SERVICE

I hereby certify that on December 5, 2025, I caused a true and correct copy of the foregoing Petitioners' Motion to Seal to be served electronically on counsel for Patent Owner at the following addresses:

James T. Carmichael (jim@carmichaelip.com)
Stephen Schreiner (schreiner@carmichaelip.com)
Minghui Yang (mitch@carmichaelip.com)
Christopher R. Abidin (chris@carmichaelip.com)
Robert S. Pickens (Rpickens@kasowitz.com)
Amanda Sewanan (Asewanan@kasowitz.com)
MultifoldIPRs@carmichaelip.com

By: /Naveen Modi/
Naveen Modi (Reg. No. 46,224)
Counsel for Petitioner Google