Filed on behalf of: GoSecure, Inc.

Entered: June 20, 2025

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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CROWDSTRIKE, INC.,
Petitioner,

v.

GOSECURE, INC.,
Patent Owner.

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Case IPR2025-00070
Patent 9,954,872

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**PATENT OWNER'S MOTION TO FILE DOCUMENTS UNDER SEAL AND FOR A PROTECTIVE ORDER**

## I. INTRODUCTION

Pursuant to 37 C.F.R. §§ 42.14 and 42.54, Patent Owner GoSecure, Inc., ("GoSecure" or "Patent Owner") respectfully requests the Board authorize the filing under seal of Patent Owner's Motion for Additional Discovery and Exhibits 2100-2106 (collectively, "Confidential Exhibits"). In addition, GoSecure respectfully requests the Board enter the Default Protective Order, which is consistent with the PTAB Consolidated Trial Practice Guide. *See* U.S. Pat. & Trademark Off., Patent Trial and Appeal Board Consolidated Trial Practice Guide 91, 117-122 (Nov. 2019) ("Consolidated Trial Practice Guide"). A copy of it is filed herewith as Exhibit 2026.

The Confidential Exhibits contain GoSecure's confidential information designated as PROTECTIVE ORDER MATERIAL under the Default Protective Order. *See* Exhibit 2026. The designated materials GoSecure seeks to seal include confidential technical and financial information, including financial data, design documents, and business information. These materials relate to the core of GoSecure's business. Public disclosure of this information would significantly harm GoSecure's competitive positions because it would allow competitors to access sensitive technical information.

GoSecure respectfully submits that the status of the parties as mutual competitors; the wide acceptance of the fact that highly sensitive and confidential technical information should be afforded protections from disclosure; and the

confidential nature of the information that is the subject of the Default Protective Order all weigh strongly in favor of granting this motion.

As shown below, good cause supports this motion.

## II. GOOD CAUSE SUPPORTS ENTRY OF THE PROTECTIVE ORDER

The Board's default protective order is appropriate here. Consolidated Trial Practice Guide 117-122. GoSecure is not seeking any deviations or modifications. *Id.* 91 ("The Board encourages the parties to adopt the Board's default protective order if they conclude that a protective order is necessary."). The Board's default protective order ensures protection of sensitive technical and commercial materials while balancing the public's interest in access to the proceedings. The use of the Board's default protective order is also consistent with the parties' mutual interest in safeguarding confidential business information during this proceeding.

GoSecure contacted Petitioner's counsel in an attempt to reach agreement on a Joint Stipulated Protective Order. Petitioner did not agree to the Default Protective Order but did not propose any changes to the Default Protective Order. GoSecure remains amenable to considering proposed changes to the Default Protective Order in the event Petitioner's confidential information is entered into the record.

## III. GOOD CAUSE EXISTS TO SEAL THE CONFIDENTIAL EXHIBITS

Good cause supports sealing the Confidential Exhibits. These documents contain sensitive, non-public materials, including proprietary technical information

relating to GoSecure's product architecture and internal systems; non-public financial and operational data; and business strategies and internal communications. Specifically, Exhibits 2100 and 2106 contain information from a confidential Board Meeting. Patent Owner's Motion for Additional Discovery reproduces passages from both of these documents. Further, Exhibits 2101-2105 are internal GoSecure emails related to product meetings, recruiting, staffing, and departures that are also described and/or quoted in the Motion for Additional Discovery.

Disclosure of this information would cause serious competitive harm to GoSecure by allowing third parties and competitors to gain insight into GoSecure's confidential internal operations and technical and business approaches. The sealing of such information is consistent with protections available under Fed. R. Civ. P. 26(c)(1)(G) and 37 C.F.R. § 42.54.

GoSecure will file publicly redacted versions of the sealed documents where appropriate to maintain a complete and understandable public record while preserving the confidentiality of the sealed content.

## IV. CONCLUSION

For the reasons discussed above, GoSecure's motion should be granted.

Respectfully submitted,

Dated: June 20, 2025

By: */s/ Steven W. Peters*

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## CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6(e), I certify that on this 20th day of June, 2025, a true and correct copy of the foregoing **Patent Owner's Motion To File Documents Under Seal And For A Protective Order** was served by electronic mail on Petitioner's lead and backup counsel at the following email addresses:

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