UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

JUMIO CORPORATION
Petitioner,

v.

FACETEC, INC.
Patent Owner.

Patent No. 10,776,471

Inter Partes Review No. IPR2025-00106

MOTION TO SEAL PETITIONER'S OPPOSITION TO PATENT OWNER'S MOTION TO FILE SUPPLEMENTAL INFORMATION

Pursuant to 37 C.F.R. §§ 42.14 and 42.54, Petitioner Jumio Corporation respectfully submits this Motion to Seal Petitioner's Opposition to Patent Owner's Motion to File Supplemental Information. The Board previously entered the parties' Protective Order (EX1053, EX1054). (Paper 40.)

I. GOOD CAUSE EXISTS FOR SEALING THE MOTION 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 the Petitioner's Opposition to Patent Owner's Motion to File Supplemental Information contains Patent Owner's highly confidential information. The highly confidential information includes confidential information from the January 8, 2026 Turk Deposition (EX1059), the January 15, 2026 Rose Deposition (EX1082), the Second Rose Declaration, Patent Owner's Sur-Reply (Paper 59), and Patent Owner's Demonstratives (Paper 69). The disclosure of highly confidential information is likely to significantly harm Patent Owner's competitive position, thereby providing good cause reasons for sealing the Petitioner's Opposition to Patent Owner's Motion to File Supplemental Information. EX1059, EX1082, the Second Rose Declaration, portions of Patent Owner's Sur-Reply (Paper 59), and Demonstratives

(Paper 69) qualify for PROTECTIVE ORDER MATERIAL – ATTORNEYS' EYES ONLY protection pursuant to the entered Protective Order.

Thus, Petitioner's Opposition to Patent Owner's Motion to File Supplemental Information should be sealed under 37 C.F.R. § 42.54. Petitioner is filing a redacted version of its Opposition to Patent Owner's Motion to File Supplemental Information 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 is not 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 on sealing confidential information in EX1059, EX1082, the Second Rose Declaration, Patent Owner's Sur-Reply (Paper 59), and Patent Owner's Demonstratives (Paper 69), and neither party opposes sealing the Opposition to Patent Owner's Motion to File Supplemental Information given that the Opposition contains previously sealed confidential information.

IV. CONCLUSION

For the foregoing reasons, Petitioner respectfully requests that the Board seal and protect the confidential information contained in its Motion to Seal Petitioner's

Opposition to Patent Owner's Motion to File Supplemental Information for the duration of this proceeding (and thereafter). Petitioner further requests that the Board provisionally seal and protect the confidential information until such time as it receives and rules on this Motion.

Dated: March 17, 2026

Respectfully submitted,

By: */Jean Nguyen/*

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Certificate of Service (37 C.F.R. § 42.6(e)(4))

I hereby certify that the attached MOTION TO SEAL PETITIONER'S OPPOSITION TO PATENT OWNER'S MOTION TO FILE SUPPLEMENTAL INFORMATION was served as of the below date via email (by agreement) to the following counsel of record for Patent Owner:

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Dated: March 17, 2026

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