UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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JUMIO CORPORATION,
Petitioner,

v.

FACETEC, INC.,
Patent Owner.

Patent No. 11,693,938

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Inter Partes Review No. IPR2025-00108

MOTION TO SEAL PETITIONER'S OBJECTIONS TO PATENT OWNER'S DEMONSTRATIVES

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

I. GOOD CAUSE EXISTS FOR SEALING THE DEMONSTRATIVES 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 Objections to Patent Owner's Demonstratives contain Petitioner's and Patent Owner's highly confidential information as previously outlined in Patent Owner's Motion to Seal Demonstratives (Paper 68). The highly confidential information includes confidential information from the January 8, 2026 Turk Deposition (EX1059), the January 15, 2026 Rose Deposition (EX1082), the Declaration of Josh Rose (EX2059), the Second Declaration of Josh Rose, Patent Owner's Patent Owner Response (Paper 43), and Patent Owner's Sur-reply (Paper 59). The disclosure of this highly confidential information is likely to significantly harm Petitioner's and Patent Owner's competitive position, thereby providing good cause reasons for sealing the Petitioner's Objections to Patent Owner's Demonstratives. EX1059, EX1082, EX2059, the Second Declaration of Josh Rose, portions of Patent

Owner's Patent Owner Response (Paper 43), and portions of Patent Owner's Sur-reply (Paper 59) qualify for PROTECTIVE ORDER MATERIAL – ATTORNEYS' EYES ONLY protection pursuant to the entered Protective Order.

Thus, Petitioner's Objections to Patent Owner's Demonstratives should be sealed under 37 C.F.R. § 42.54. Petitioner is filing a redacted version of its Objections to Patent Owner's Demonstratives 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 objections to Patent Owner's demonstratives, and neither party opposes sealing the objected to confidential Patent Owner's Demonstratives given that these demonstratives contain previously sealed confidential information.

IV. CONCLUSION

For the foregoing reasons, Petitioner respectfully requests that the Board seal and protect the confidential information contained in Petitioner's Objections to Patent Owner's Demonstratives 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 16, 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 OBJECTIONS TO PATENT OWNER'S DEMONSTRATIVES 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 16, 2026

/Jean Nguyen/
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