

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

JUMIO CORPORATION,
Petitioner,

v.

FACETEC, INC.,
Patent Owner.

Patent No. 11,874,910

Inter Partes Review No. IPR2025-00109

PETITIONER'S MOTION TO SEAL

Pursuant to 37 C.F.R. §§ 42.14 and 42.54, Petitioner Jumio Corporation submits this Motion to Seal Petitioner's Reply and certain exhibits thereto, all of which are being concurrently filed with this Motion. The Board previously entered the parties' Protective Order (EX1053, EX1054). (Paper 40.)

I. GOOD CAUSE EXISTS FOR SEALING THE EXHIBITS 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 Petitioner's Reply, the Reply Declaration of Dr. Daft (EX1060), the January 8, 2026 Turk Deposition (EX1059), and the January 15, 2026 Rose Deposition (EX1082) contain Patent Owner's highly confidential information and non-public information concerning technical, business, financial, and strategy information of Patent Owner, the disclosure of which is likely to significantly harm Patent Owner's competitive position in its view, thereby providing good cause reasons for sealing the Reply and each of the Exhibits. EX1059, EX1060, and 1082 qualify for PROTECTIVE ORDER MATERIAL – ATTORNEYS' EYES ONLY protection pursuant to the entered Protective Order. The portions of Petitioner's Reply and the Reply Declaration of Dr. Daft that describe or quote these Exhibits likewise qualifies for the same protection.

Thus, Petitioner's Reply, the Reply Declaration of Dr. Daft, the January 8, 2026 Turk Deposition, and the January 15, 2026 Rose Deposition should be sealed under 37 C.F.R. § 42.54. Petitioner is filing a redacted version of its Reply and each Exhibit to the public docket.¹

II. CERTIFICATION OF NON-PUBLICATION

To the best of Petitioner's knowledge, the information sought to be sealed by this Motion has not been published or otherwise made 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, and Patent Owner does not oppose sealing Petitioner's Reply and Exhibits 1059, 1060, and 1082.

¹ The entire transcript of EX1082 was designated "Confidential – Attorneys' Eyes Only" by Patent Owner's counsel at Rose's deposition. (EX1082, 37:17-25.) Patent Owner's counsel provided Petitioner a public, redacted version of EX1082 on January 21—the day of Petitioner's filing. Petitioner is submitting this public, redacted version of EX1082 in the interest of time, but reserves its right to object to any redactions.

IV. CONCLUSION

For the foregoing reasons, Petitioner respectfully requests that the Board seal and protect the highly confidential information contained in Petitioner's Reply and Exhibits 1059, 1060, and 1082.

Dated: January 21, 2026

Respectfully submitted,

By: /s/ Jean Nguyen
Jean Nguyen, Reg. 71,051
MORRISON & FOERSTER LLP
707 Wilshire Blvd., Suite 6000
Los Angeles, CA 90017
Email: JNguyen@mofo.com
Tel: 213-892-5200

Counsel for Petitioner

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

I hereby certify that the attached PETITIONER’S MOTION TO SEAL was served as of the date below via email (by agreement) to the following counsel of record for Patent Owner:

Joshua L. Goldberg
Christopher C. Johns
Jason Stach
Chen Zang
Anthony Berlenbach
Kassandra M. Officer
Email: Joshua.Goldberg@finnegan.com
Email: Christopher.Johns@finnegan.com
Email: Jason.Stach@finnegan.com
Email: Chen.Zang@finnegan.com
Email: Anthony.Berlenbach@finnegan.com
Email: Kassandra.Officer@finnegan.com
Email: FaceTec-Jumio-IPRs@finnegan.com

Dated: January 21, 2026

/s/ Jean Nguyen
Jean Nguyen