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. 11,874,910

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Inter Partes Review No. IPR2025-00109

PETITIONER'S MOTION TO SEAL DEMONSTRATIVES

Pursuant to 37 C.F.R. §§ 42.14 and 42.54, Jumio Corporation respectfully submits this Motion to Seal Petitioner's Oral Argument 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 Oral Argument Demonstratives contain Petitioner's and Patent Owner's highly confidential information including confidential information from the iProov Agreement (EX2083), a FaceTec Document (EX2067), the January 8, 2026 Turk Deposition (EX1059), the January 15, 2026 Rose Deposition (EX1082), a FaceTec Agreement (EX2073), and Patent Owner's Patent Owner Response (Paper 43). 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 Petitioner's Oral Argument Demonstratives. EX2083, EX2067, EX1059, EX1082, EX2073, and portions of Patent Owner's Patent Owner Response (Paper 43) qualify for PROTECTIVE ORDER MATERIAL – ATTORNEYS' EYES ONLY protection pursuant to the entered Protective Order.

Thus, Petitioner's Oral Argument Demonstratives should be sealed under 37 C.F.R. § 42.54. Petitioner is filing a redacted version of its Oral Argument 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 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 Oral Argument Demonstratives.

IV. CONCLUSION

For the foregoing reasons, Petitioner respectfully requests that the Board seal and protect the confidential information contained in Petitioner's Oral Argument 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 12, 2026

Respectfully submitted,

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

I hereby certify that the attached PETITIONER'S MOTION TO SEAL 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 12, 2026

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