

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

RØDE MICROPHONES, LLC AND
FREEDMAN ELECTRONICS PTY LTD,
Petitioners,

v.

ZAXCOM, INC.,
Patent Owner.

IPR2025-00232

Patent 10,276,207

PETITIONERS' MOTION TO SEAL

I. RELIEF REQUESTED

Pursuant to 37 C.F.R. § 42.54, 35 U.S.C. § 316(a)(1), the Patent Trial and Appeal Board's ("PTAB") Consolidated Trial Practice Guide, Section I.E., and the proposed protective order filed on November 26, 2025 ("Proposed Protective Order") with an unopposed Motion for Protective Order. Paper 38. Petitioners move to seal portions of (1) their Opposition to Motion for Sanctions and Vacatur of Institution/Termination, and (2) Exhibits 1082 and 1085 in support of that Opposition.

II. PENDING UNOPPOSED MOTION FOR PROTECTIVE ORDER

On November 26, 2025, Patent Owner filed an unopposed motion for entry of an attached protective order in this proceeding. Paper 38. All parties agreed upon the procedures set forth in the new Proposed Protective Order, which awaits Board approval. The proposed order at paragraph 5(a)(i) requires a party filing its own confidential information with the Board to file it with a motion to seal and set forth the reasons why the information is confidential and should not be made available to the public. At paragraph 5(a)(ii), the proposed order also requires a party seeking only partial sealing of a document to submit both redacted and unredacted versions of the document, with redactions clearly marked.

III. GOOD CAUSE EXISTS FOR SEALING CERTAIN CONFIDENTIAL INFORMATION

The Consolidated Trial Practice Guide provides that “the rules aim to strike a balance between the public’s interest in maintaining a complete and understandable file history and the parties’ interest in protecting truly sensitive information.” Consolidated Trial Practice Guide (Nov. 2019) § I(E). The rules also “identify confidential information in a manner consistent with Federal Rule of Civil Procedure 26(c)(1)(G), which provides for protective orders for trade secret or other confidential research, development or commercial information. *Id.* § I(E)(2) (citing 37 C.F.R. § 42.54).

In this case, good cause exists to seal portions of portions of Petitioners’ Opposition brief, Exhibit 1082 (Declaration of Damien Wilson) and Exhibit 1085 (Declaration of Pieter Schillebeecks). The Opposition and Exhibits 1082 and 1085 describe potential future product plans and the specific type of technology that Petitioners and Lectrosonics, Inc., were discussing in confidential communications beginning in June 2024 to explore the possibility of a joint venture. The information is commercially sensitive and confidential.

IV. CONCLUSION

For the foregoing reasons, Petitioners respectfully request that the Board grant this Motion to Seal Petitioner’s Opposition to Motion for Sanctions and Vacatur of Institution/Termination Under 35 U.S.C. § 315(b), and Exhibits 1082

and 1085 in support of Petitioners' Opposition.

Dated: December 10, 2025

By: / Michael A. Fisher /

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CERTIFICATE OF SERVICE

I certify that today in:

RØDE Microphones, LLC., et al. v, Zaxcom, Inc., IPR2025-00232 (U.S. Patent 10,276,207)

I caused to be served a copy of:

Petitioners' Motion to Seal

upon:

ZAXCOM INC., c/o:

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Patent Owner agreed to have the above-listed counsel accept electronic service in its December 23, 2004 Mandatory Notices. *See* 37 CFR § 42.105(b) ("Upon agreement of the parties, service may be made electronically....").

Dated: December 10, 2025

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