

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

ENTEGRIS, INC.
Petitioner,

v.

INPRIA CORP.
Patent Owner.

Case No. IPR2025-00267
U.S. Patent 11,673,903

**PETITIONER’S MOTION TO SEAL RESPONSIVE BRIEF
ADDRESSING REAL-PARTY-IN-INTEREST**

Pursuant to 37 C.F.R. § 42.54, Petitioner Entegris, Inc. (“Entegris”) hereby moves to seal Entegris’s Responsive Brief Addressing Real-Party-In-Interest (“Responsive RPI Brief”). Good cause exists for granting this motion because Entegris’s Responsive RPI Brief relies on Exhibits 2046, 2047, 2048, 2053, 2054 and 2055, which are designated as “HIGHLY CONFIDENTIAL – OUTSIDE COUNSEL ONLY” or “Confidential” under the Modified Protective Order (Paper 25), and because Entegris’s Responsive RPI Brief responds to confidential discussion of these exhibits found in Patent Owner Inpria Corp.’s Supplemental Brief on RPI Issues (Paper 28).

Additionally, good cause exists for granting this motion because Inpria has similarly moved to seal Exhibits 2046, 2047, 2048, 2053, 2054 and 2055 and any portions of its briefing that rely on the confidential material in those exhibits.

I. Good Cause Exists for Sealing Entegris’s Responsive RPI Brief.

The Board’s *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.” Patent Trial and Appeal Board, *Consolidated Trial Practice Guide*, at 19 (Nov. 2019 ed.), <https://www.uspto.gov/TrialPracticeGuideConsolidated> (“Trial Practice Guide”). Those rules “identify confidential information in a manner consisted 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.* (citing 37 C.F.R. § 42.54).

Inpria has similarly moved to seal Exhibits 2046, 2047, 2048, 2053, 2054 and 2055 in their entirety. See Paper 27. These exhibits “contain non-public information, including information relating to third parties” and discuss highly-confidential business information pertaining to Entegris and others. This information falls squarely with the type of information the Board has repeatedly sealed. See, e.g., *Snap-On Inc. v. Milwaukee Elec. Tool Corp.*, IPR2015-001242, Paper 75, at 2-3 (PTAB Sept. 23, 2016) (sealing “sales information,” “licensing agreements,” and “development documents”).

The public interest will not be harmed by sealing these confidential documents and agreements. See, e.g., *Pinnacle Towers LLC v. Airpowered, LLC*, No. 5:15-cv-81-OC-34PRL, 2015 WL 5897524, at *1 (M.D. Fla. Oct. 7, 2015) (“the terms of confidential agreements oftentimes outweighs the public’s right of access”) (citation and quotation omitted). Further, Entegris will file a public version of its Responsive RPI Brief that redacts any confidential information, mitigating any potential harm to the public’s interest and in accordance with the Board’s interest in “the public availability of trial proceedings.” Trial Practice Guide, at 100.

Thus, good cause exists to seal Entegris’s Responsive RPI Brief. As such, Entegris respectfully requests the Board grant this Motion.

Respectfully submitted,

January 16, 2025

Date

/ Eliot D. Williams /

Eliot D. Williams (Reg. No. 50,822)

CERTIFICATE OF COMPLIANCE

1. Pursuant to 37 C.F.R. § 42.24(d), the undersigned certifies that the foregoing Petitioner's MOTION TO SEAL RESPONSIVE BRIEF ADDRESSING REAL-PARTY-IN-INTEREST complies with the type-volume or page limitations set forth in 37 C.F.R. § 42.24(a)(1)(v).

2. This Motion complies with the general format requirements of 37 C.F.R. § 42.6(a) and has been prepared using Microsoft® Word in 14-point Times New Roman.

Respectfully submitted,
BAKER BOTTS L.L.P.

January 16, 2026
Date

/ Eliot D. Williams /
Eliot D. Williams (Reg. No. 50,822)
LEAD COUNSEL FOR PETITIONER

CERTIFICATE OF SERVICE

In accordance with 37 C.F.R. §§ 42.6(e) and 42.105, the undersigned certifies that on January 16, 2026, a complete and entire copy of the foregoing Petitioner's Motion to Seal Responsive Brief Addressing Real-Party-In-Interest was served via email to Patent Owner at the following address(es):

PH-Entegris-Inpria-IPR@paulhastings.com

Respectfully submitted,
BAKER BOTTS L.L.P.

January 16, 2026
Date

/ Eliot D. Williams /
Eliot D. Williams (Reg. No. 50,822)
LEAD COUNSEL FOR PETITIONER