

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 ITS AUTHORIZED RESPONSE IN
OPPOSITION TO PATENT OWNER’S REQUEST FOR DIRECTOR
REVIEW OF DECISION GRANTING INSTITUTION**

Pursuant to 37 C.F.R. § 42.54, Petitioner Entegris, Inc. (“Entegris”) hereby moves to seal Entegris’s Authorized Response in Opposition to Patent Owner’s Request for Director Review of Decision Granting Institution (“Response to Patent Owner’s Request for Director Review”). Good cause exists for granting this motion because Entegris’s Response to Patent Owner’s Request for Director Review relies on and discusses previously submitted exhibits which are designated as “HIGHLY CONFIDENTIAL – OUTSIDE COUNSEL ONLY” or “Confidential” under the Modified Protective Order (Paper 25), including Exhibits 2046, 2047, 2048, 2053, and 2055, and because Entegris’s Response to Patent Owner’s Request for Director Review responds to confidential discussion of these exhibits found in Patent Owner Inpria Corp.’s Request for Director Review of Decision Granting Institution (Paper 38).

Additionally, good cause exists for granting this motion because Inpria has similarly moved to seal its Request for Director Review of Decision Granting Institution.

I. Good Cause Exists for Sealing Entegris’s Response to Patent Owner’s Request for Director Review.

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 its Request for Director Review of Decision Granting Institution. *See* Paper 37. The briefs discuss exhibits, including Exhibits 2046, 2047, 2048, 2053, and 2055, which “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 Response

to Patent Owner’s Request for Director Review 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 Response to Patent Owner’s Request for Director Review. As such, Entegris respectfully requests the Board grant this Motion.

Respectfully submitted,

February 19, 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 AUTHORIZED RESPONSE IN OPPOSITION TO PATENT OWNER'S REQUEST FOR DIRECTOR REVIEW OF DECISION GRANTING INSTITUTION 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.

February 19, 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 February 19, 2026, a complete and entire copy of the foregoing Petitioner's Motion to Seal Its Authorized Response in Opposition to Patent Owner's Request for Director Review of Decision Granting Institution 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.

February 19, 2026
Date

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