UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

TESLA, INC.

Petitioner,

v.

GRANITE VEHICLE VENTURES LLC,
Patent Owner.

Case IPR2025-00943
Patent 11,597,402

PATENT OWNER'S UNOPPOSED MOTION TO SEAL

Pursuant to 37 C.F.R. § 42.14 and the Trial Practice Guide, Patent Owner Granite Vehicle Ventures LLC respectfully submits this Motion to Seal Exhibit 2015 and certain portions Patent Owner's Discretionary Denial Brief Pursuant to the Board's March 26, 2025 Interim Process for PTAB Workload Management, both of which are filed herewith. Patent Owner filed, concurrently with this Motion to Seal, a Motion for Protective Order requesting entry of the Board's default protective order.

The Office Patent 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." 77 Fed. Reg. 48756, 48760 (Aug. 14, 2012). Further, those rules "identify confidential information in a manner consistent with Federal Rules 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).

- Exhibit 2015 consists of excerpts from Petitioner Tesla, Inc.'s Responses to Interrogatories, served in *Granite Vehicle Ventures LLC, v. Tesla, Inc.*, No. 2:24-cv-01007-JRG (E.D. Tex.) and designated "CONFIDENTIAL" under the Protective Order in that case. Petitioner consented to its use in this proceeding, provided that it remained confidential pursuant to the PTAB's procedures.
- Patent Owner's Discretionary Denial Brief will reference and/or reproduce information from Exhibit 2015.

For these reasons, Patent Owner requests that Exhibit 2015 and certain portions Patent Owner's Discretionary Denial Brief Pursuant to the Board's March 26, 2025 Interim Process for PTAB Workload Management be placed and maintained under seal, consistent with the agreed Protective Order.

Counsel for Patent Owner conferred with Counsel for Petitioner, and Petitioner does not oppose this Motion.

Dated: August 11, 2025

Respectfully submitted,

/ Kyle E. Friesen /

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Attorney for Patent Owner,
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CERTIFICATE OF SERVICE

The undersigned certifies that on the eleventh day of August, 2025, a copy of the foregoing Patent Owner's Unopposed Motion to Seal was served on the following counsel of record via email:

Counsel for Petitioner	
Lead Counsel	**Backup Counsel**
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Dated: August 11, 2025

Respectfully submitted,

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