

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAMSUNG ELECTRONICS CO., LTD.
PETITIONER

V.

CM HK LIMITED
PATENT OWNER

Case No.: IPR2025-01071
Patent No. 11,698,687

PETITIONER'S MOTION TO SEAL

I. STATEMENT OF RELIEF REQUESTED

Concurrently with the filing of the Declaration of Keunwoo Justin Choi regarding certain aspects of Samsung's United States litigation strategy (Exhibit 1025, the "Declaration") and Petitioner's Reply to Patent Owner's Response (the "Reply"), Petitioner moves for: (1) entry of the Board's Default Protective Order, as set forth in Appendix B of the Consolidated Trial Practice Guide ("CTPG"); and (2) an order sealing portions of the Declaration under that Protective Order. This Motion is brought pursuant to 37 C.F.R. §§ 42.14 and 42.54 and Appendix B of the CTPG.

II. ARGUMENT

Petitioner moves to seal the unredacted portions of the Declaration of Keunwoo Justin Choi (Exhibit 1025) under the Board's Default Protective Order because they contain confidential, nonpublic information concerning certain aspects of Petitioner's United States litigation strategy offered in support of the Reply. Public disclosure of this highly confidential information could prejudice Samsung by revealing its confidential litigation strategy to litigation adversaries and other third parties. Accordingly, good cause exists to seal portions of the Declaration. The Board's rules permit confidential information filed with the Board to be placed under seal upon a showing of good cause.

Petitioner has designated the Declaration as PROTECTIVE ORDER MATERIAL. Petitioner concurrently files public and redacted versions of the Declaration. The redactions are narrowly tailored to remove only the information necessary to protect the confidential material while leaving the substance of Petitioner's arguments publicly understandable.

III. CONCLUSION

For the foregoing reasons, Petitioner respectfully requests that the Board enter the Default Protective Order and seal the unredacted versions of Exhibit 1025.

Respectfully submitted,

Dated: July 17, 2026

By: /Naveen Modi/
Naveen Modi (Registration No. 46,224)
Counsel for Petitioner

CERTIFICATE OF SERVICE

I certify that I caused to be served on the counsel identified below a true and correct copy of Petitioner's Motion to Seal by electronic means on July 17, 2026:

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