

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

INFINEON TECHNOLOGIES AMERICAS CORP.,
Petitioner,

v.

MOSAID TECHNOLOGIES INC.,
Patent Owner.

Case IPR2025-01171
Patent 7,051,306

PETITIONER'S MOTION TO EXPUNGE

Petitioner files this Motion to Expunge with authorization received via email on April 16, 2026. Petitioner has conferred with Patent Owner regarding this Motion, and Patent Owner does not oppose the motion.

I. RELIEF REQUESTED

Petitioner requests that the following documents (“the Confidential Documents”) be expunged because each contains highly confidential business information not disclosed in any of the Discretionary Decisions (Papers 14, 27):

Document Name	Document Type	Exhibit/Paper
Ex. 2026 08/01/18 Letter (CONFIDENTIAL)	Exhibit	2026
Ex. 2022 02/28/23 MOSAID-Infineon/Cypress Presentation (CONFIDENTIAL)	Exhibit	2022
Ex. 2021 03/11/21 Conversant Presentation (CONFIDENTIAL)	Exhibit	2021
Ex. 2020 07/14/20 Conversant Response (CONFIDENTIAL)	Exhibit	2020
Ex. 2019 12/04/19 Conversant Presentation (CONFIDENTIAL)	Exhibit	2019
Ex. 2018 06/21/19 Conversant Response Presentation (CONFIDENTIAL)	Exhibit	2018
Ex. 2017 09/26/18 Conversant Presentation (CONFIDENTIAL)	Exhibit	2017
Ex. 2016 04/18 PSoC Claim Chart (CONFIDENTIAL)	Exhibit	2016
Ex. 2015 04/18 Presentation (CONFIDENTIAL)	Exhibit	2015
Ex. 2014 05/05/19 Letter (CONFIDENTIAL)	Exhibit	2014
Ex. 2012 Teksler Declaration (CONFIDENTIAL - ATTORNEYS' EYES ONLY)	Exhibit	2012
Ex. 2005 11/03/17 Letter (CONFIDENTIAL)	Exhibit	2005

Document Name	Document Type	Exhibit/Paper
Confidential_Declaration of Dr. Martin Bayerl	Exhibit	1058
Confidential_Declaration of Terence P. Woodsome	Exhibit	1046
Confidential_Petitioner's Discretionary Denial Opposition Brief	Paper	12
Patent Owner's Discretionary Denial Brief (CONFIDENTIAL - ATTORNEYS' EYES ONLY)	Paper	8

II. GOOD CAUSE

The Confidential Documents contain highly confidential business information. The confidential business information has not been publicly disclosed to Petitioner's knowledge, and revelation of the information would result in harm to Petitioner and Patent Owner. As explained in Petitioner's Motion to Seal (Paper 10), the Confidential Documents include information pertaining to negotiations, terms (including financial terms), and conditions with respect to licensing and litigation settlements involving Petitioner and Patent Owner. The information is indicative of how Petitioner and Patent Owner conduct business and make business decisions relating to licensing and litigation. Petitioner and Patent Owner would suffer concrete harms from public exposure of such confidential business information. For example, a third party armed with this information would gain otherwise unavailable insight into Petitioner and Patent Owner's approach and strategy regarding patent licensing negotiations, litigation, and settlement. It is therefore particularly

important that the confidential information contained in the Confidential Documents remain confidential.

None of the Confidential Documents are cited, referenced, or implicated by the Discretionary Decisions (Papers 14, 27). Accordingly, the Confidential Documents would not aid the public in any material way.

III. CONCLUSION

For all these reasons, Petitioner respectfully requests that the Board and Director grant this Motion and expunge the Confidential Documents.

Respectfully submitted,

Date: April 21, 2026

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CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6(e)(4), the undersigned certifies that on April 21, 2026, a complete and entire copy of this Petitioner's Motion to Expunge was provided via email, to Patent Owner by serving the email correspondence addresses of record as follows:

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