

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

NIANTIC INC.,

Petitioner,

v.

IMAGINEAR, INC.,

Patent Owner.

IPR2025-01273, IPR2025-01274, IPR2025-01275, IPR2025-01276,
Patent Nos. 10,946,284, 11,484,797, 11,666,827, and 12,070,691

**PATENT OWNER'S MOTION TO SEAL EXHIBIT 2001 TO
PATENT OWNER'S DISCRETIONARY DENIAL BRIEF**

I. INTRODUCTION

Pursuant to 37 C.F.R. §§ 42.14 and 42.54, Patent Owner requests permission to seal Exhibit 2001 to Patent Owner's Discretionary Denial Brief, as this exhibit contains protected information belonging to a third party, Inflection Point Strategy, Inc. ("IPS").

II. GOOD CAUSE EXISTS TO SEAL EXHIBIT 2001

Exhibit 2001 is an email chain from November–December 2018 between Shaun MacDonald of Extreme Venture Partners and Vikram Grover and Omar Tellez of Niantic, Inc., copying Ron Laurie of IPS. IPS produced the email to Patent Owner under the protection of the Protective Order entered in the parallel district court proceeding (EX2007) and designated the email chain "Confidential." As third-party information produced subject to a Protective Order, Patent Owner asserts that good cause exists to maintain EX2001 under seal.

III. CERTIFICATION OF NON-PUBLICATION

Patent Owner has taken appropriate steps to maintain the confidentiality of the above-referenced information. Patent Owner has not otherwise shared or disseminated this email.

IV. PROTECTIVE ORDER

A protective order is in place in the parallel district court proceeding. (EX2007.) Patent Owner requests entry of the Default Protective Order found in the Board's Trial Practice Guide.

V. CONCLUSION

For the foregoing reasons, Patent Owner respectfully requests that Exhibit 2001 to Patent Owner's Discretionary Denial Brief be placed under seal by the Board.

Date: September 22, 2025

/s/James J. Lukas, Jr.

James J. Lukas, Jr. (Reg. No. 59,114)

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CERTIFICATE OF SERVICE

I hereby certify, in accordance with 37 C.F.R. § 42.205, that the foregoing
**MOTION TO SEAL EXHIBIT 2001 TO PATENT OWNER'S
DISCRETIONARY DENIAL BRIEF** was served via electronic mail on September
22, 2025 on the following counsel of record for Petitioner and to Niantic-
ImagineAR-IPRs@perkinscoie.com:

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Date: September 22, 2025

/s/ James J. Lukas, Jr.
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