

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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SK hynix Inc.  
Petitioner

v.

Advanced Memory Technologies, LLC  
Patent Owner

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Case IPR2025-01451  
Patent No. 7,969,231

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**PETITIONER'S MOTION TO SEAL**

Under 37 C.F.R. §§ 42.14 and 42.54, Petitioner SK hynix Inc. submits this motion to seal certain exhibit to its Petition for *Inter Partes* Review and for entry of the default Protective Order. The exhibit sought to be sealed and default Protective Order are filed concurrently with this Motion.

## **I. GOOD CAUSE EXISTS FOR SEALING**

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. 48,756, 48,760 (Aug. 14, 2012). Those rules “identify confidential information in a manner consistent 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).

Exhibit 1006 is a claim chart (the “Claim Chart”) generated by Patent Owner from the parallel district court litigation for the alleged infringement of the Challenged Patent. In the district court litigation, Patent Owner represented that the Claim Chart contains Patent Owner’s proprietary and confidential information and designated it as “CONFIDENTIAL” subject to the applicable Protective Order from the parallel litigation. Accordingly, Exhibit 1006 qualifies for PROTECTIVE ORDER MATERIAL protection under the default Protective Order and should be

sealed under 37 C.F.R. § 42.54. Because Exhibit 1006 was designated as “CONFIDENTIAL” in its entirety in the district court, there is no redacted version of Exhibit 1006 that can be filed to the public docket. Patent Owner indicated that it does not oppose filing the Claim Chart as a confidential exhibit under the default Proposed Order in this proceeding.

The Petition and Declaration of Dr. Carl Sechen (Ex. 1002) contain snapshots of the Claim Chart and thus should be similarly protected in this proceeding under the default Protective Order. Patent Owner files concurrently herewith public versions of the Petition and Declaration that redact the confidential materials.

## **II. CERTIFICATION OF NON-PUBLICATION**

To the best of Petitioner’s knowledge, the information sought to be sealed by this Motion has not been published or otherwise made publicly available.

## **III. PROTECTIVE ORDER**

Petitioner seeks entry of the default Protective Order to govern the treatment of documents and information submitted according to its provisions in this proceeding.

## **IV. CONCLUSION**

For the foregoing reasons, Petitioner respectfully requests that the Board seal and protect Petitioner’s Petition, Declaration of Dr. Carl Sechen (Ex. 1002), and Exhibit 1006.

Date: August 27, 2025

/s/ James M. Glass

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## **CERTIFICATE OF SERVICE**

Pursuant to 37 C.F.R. § 42.6(e), the undersigned certifies that on August 27, 2025, a complete and entire copy of the above document was provided by email to Patent Owner by serving correspondence addresses of record as follows:

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Date: August 27, 2025

/s/ James M. Glass  
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