UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

MICRON TECHNOLOGY, INC. and
MICRON SEMICONDUCTOR PRODUCTS, INC.,

Petitioner

v.

PALISADE TECHNOLOGIES, LLP,
Patent Owner.

Case No. IPR2025-01559
U.S. Patent No. 9,524,974

PETITIONER'S REQUEST FOR IN CAMERA REVIEW AND MOTION TO SEAL

I. INTRODUCTION

The Director's November 17, 2025, Memorandum (the "SDD Memo") encourages *inter partes* review petitioners to "submit a Search Disclosure Declaration (SDD) that explains, in detail" information relevant to their search methodologies. SDD Memo, 1. The SDD Memo stated that a petitioner may file an SDD "with a motion to seal and an accompanying request for in camera review under 37 C.F.R. § 42.14." *Id.*, 2. Petitioner Micron Technology, Inc. and Micron Semiconductor Products, Inc. ("Micron" or "Petitioner") respectfully requests that its SDD be sealed and reviewed in camera.

II. REQUEST FOR IN CAMERA REVIEW

Petitioner respectfully requests that, given the work product and privileged nature of the information contained in its proffered SDD, Petitioner identifies Exhibit 1042 for in camera review.

III. MOTION TO SEAL

Under 37 C.F.R. § 42.14 and the Office Patent Trial Practice Guide, Petitioner respectfully submits this Motion to Seal its SDD (Ex-1042), which is filed concurrently with this Motion.

Petitioner concurrently files as Exhibit 1041 its Proposed Protective Order, which differs from the default Protective Order in two ways. First, the individuals who may access this information are limited to Petitioner; representatives, in-house counsel, and support personnel of Petitioner; and the Patent Office. Second,

paragraph 2(E) adds language "indicat[ing] that the Office may use the information in a [search disclosure declaration (SDD)] for internal training, improving examination processes, and analytics," as stated in Director Squires's Memorandum to All PTAB Users (Nov. 17, 2025). Ex-1041 ¶ 2(E) (specifying that the Office may use the SDD "for internal training, improving examination processes, and analytics").

Petitioner identifies Exhibit 1042 as containing information designated by Petitioner as Confidential and Protective Order Material. Petitioner files this Motion to seal the designated information under the Proposed Protective Order.

A. Micron Champions AI Use for More Efficient Prior Art Searches

Micron is a leading enabler of the expanding artificial intelligence (AI) ecosystem—delivering advanced memory and storage solutions that power the training, deployment, and scaling of AI models. Micron also applies AI across its own manufacturing and business operations to enhance efficiency and quality. Recognizing the inefficiencies of time-intensive, manual processes that rely on Boolean search-based techniques, Micron regularly deploys, and in this case deployed, AI to streamline and accelerate prior art identification.

B. Good Cause Exists for Reviewing In Camera and Sealing Certain Information

The Office's 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). The Default Protective Order (and the Proposed Protective Order) provides that "[a] party may file documents or information with the Board along with a Motion to Seal. The Motion to Seal should provide a non-confidential description of the nature of the confidential information that is under seal and set forth the reasons why the information is confidential and should not be made available to the public." Ex-1041 ¶ 5(A)(i).

Exhibit 1042 contains information regarding Petitioner's prior art search process, as requested by the SDD Memo.

For the foregoing reasons, Petitioner requests its Request and Motion be granted and that the designated material remains sealed.

Respectfully submitted,

/s/ John Kappos

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CERTIFICATE OF SERVICE

I hereby certify that on November 26, 2025, I caused a true and correct copy of the foregoing PETITIONER'S REQUEST FOR IN CAMERA REVIEW AND MOTION TO SEAL to be served electronically on counsel for Patent Owner at the following addresses:

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