

CASE IPR2026-00072
Patent No. 11,200,252

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAMSUNG ELECTRONICS AMERICA, INC.,
Petitioner,

v.

KANNUU PTY LTD.,
Patent Owner.

CASE IPR2026-00072
Patent No. 11,200,252

PATENT OWNER'S MOTION TO SEAL

Under 37 CFR §§ 42.14 and 42.54, Patent Owner Kannuu Pty. Ltd. submits this Motion to Seal its Patent Owner's Response. Petitioner has submitted a proposed Protective Order. The parties have previously been involved in other *inter partes* review proceedings (IPR2020-00737 and IPR2020-00738) ("Previous IPRs") where the parties agreed to the same proposed Protective Order.

I. GOOD CAUSE EXISTS FOR SEALING PATENT OWNER'S RESPONSE.

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).

Patent Owner's Response contains sensitive, confidential, and non-public information concerning business, financial, and/or strategy information. Patent Owner submits that the redacted portions of its Response cite exhibits that had been previously submitted by both Petitioner and Patent Owner in the Previous IPRs. In the Previous IPRs, the parties had moved to seal those documents, which the Board

granted. As discussed in those motions, the documents contain the parties' confidential business information and were produced in the parallel litigation with a confidentiality designation. There is therefore good cause to seal the Response, and good cause to designate the Response as "CONFIDENTIAL – ATTORNEYS' EYES ONLY" under to the Proposed Protective Order. The unredacted version of Patent Owner's Response accordingly should be sealed in its entirety pursuant to 37 C.F.R. § 42.54. Patent has concurrently filed a redacted version of the Response.

II. CERTIFICATION OF NON-PUBLICATION

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

III. CONCLUSION

For the foregoing reasons, Patent Owner respectfully requests that the Board seal and protect the confidential information contained in the Response.

July 22, 2026

Respectfully submitted,

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CERTIFICATE OF SERVICE

I certify that the foregoing PATENT OWNER'S MOTION TO SEAL was served on July 22, 2026 on the Petitioner by filing this document through the Patent Trial and Appeal Board P-TACTS System as well as e-mailing a copy to ge-samsung-kannuu@quinnemanuel.com .

By: /s/ Lewis E. Hudnell, III
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