UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

GOOGLE LLC,

Petitioner,

v.

HEADWATER RESEARCH LLC,

Patent Owner

IPR2026-00138
Patent No. 9,609,544

PATENT OWNER'S MOTION TO FILE UNDER SEAL

Patent Owner Headwater has filed concurrently herewith Exhibit 2001, which is a confidential license agreement subject to third-party confidentiality obligations. Exhibit 2001 includes confidential business information of Headwater and third parties, and Headwater does not have authorization to publicly disclose the contents of Exhibit 2001. Accordingly, good cause exists for Exhibit 2001 to be filed under seal.

Headwater has filed Exhibit 2001 as "Board only," pursuant to Headwater's confidentiality obligations. Headwater understands that outside counsel for Google has received Exhibit 2001 in various district court litigations, and Headwater will promptly serve Google's IPR counsel with Exhibit 2001 upon confirmation that Google will treat that exhibit as for use by Google's outside counsel only in connection with this IPR.

Attached hereto as Exhibit A is a proposed protective order, which substantively mirrors the interim protective order under which Headwater has previously produced this document to outside counsel for Google in district court litigation. *See generally* https://www.txwd.uscourts.gov/wp-content/uploads/2025/03/ADA-Standing-Order-Governing-Proceedings-Patent-Cases-ATX_3.5.25.pdf at 6 (Section III: Interim Protective Order).

Patent Owner has offered to meet and confer in good faith with Google to the extent Google has any concerns regarding the confidentiality designation of this

exhibit (which exhibit Headwater does not have third-party authorization to disclose other than as outside counsel eyes only).

Date: March 23, 2026

Respectfully submitted,

/James A. Milkey/
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Counsel for Patent Owner

EXHIBIT A

If any document or information produced in this matter is deemed confidential by the producing party, the document shall be marked "confidential" or with some other confidential designation (such as "Confidential – Outside Attorneys' Eyes Only") by the disclosing party and disclosure of the confidential document or information shall be limited to each party's outside attorney(s) of record and the employees of such outside attorney(s).

CERTIFICATE OF SERVICE (37 C.F.R. § 42.6(e))

The undersigned hereby certifies that the above document was served on March 23, 2026, by filing this document through the Patent Trial and Appeal Case Tracking System (P-TACTS) as well as delivering a copy via electronic mail upon the following attorneys of record for Petitioner:

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