

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

GOOGLE LLC

Petitioner

v.

GAMBA GROUP HOLDINGS LLC,

Patent Owner

U.S. Patent No. 9,772,193

Case No.: IPR2026-00156

PETITIONER'S MOTION TO SEAL

Pursuant to 37 C.F.R. §§ 42.14, Petitioner Google hereby moves to seal Petitioner's Exhibit 1032 cited from Petitioner's Surreply in Opposition of Discretionary Denial. This exhibit reflects a communication between business partners over a confidential agreement.

I. Good Cause Exists for Sealing the Exhibit

In deciding whether to seal documents, the Board must find "good cause," and must "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." *Garmin v. Cuozzo*, IPR2012-00001, Paper 36 (April 5, 2013).

Here, the balance tips in favor of protecting this communication. Exhibit 1032 reflects a communication regarding a business relationship governed by a confidential agreement. Google has the right to shield its communications with its business partners from public view. This exhibit has nothing to do with patentability. For this reason, the public's interest in having access to Exhibit 1032 is greatly lessened. *Garmin v. Cuozzo*, IPR2012-00001, Paper 36 at 8-9 (April 5, 2013). Petitioner requests that Exhibit 1032 be sealed in its entirety.

II. Protective Order

The parties have not yet discussed a suitable protective order. Petitioner commits to working diligently with Patent Owner to put a protective order in place while this motion to seal is pending.

III. Certification of Non-Publication

The information sought to be sealed has not been published or otherwise made public.

Dated: April 16, 2026

Respectfully Submitted,

Michael L. Kiklis

Michael L. Kiklis
Reg. No. 38,939
Attorney for Petitioner
Google LLC

CERTIFICATE OF SERVICE

The undersigned certifies service pursuant to 37 C.F.R. §§ 42.6(e) of PETITIONER'S MOTION TO SEAL by filing this document through the USPTO Patent Trial and Appeal Case Tracking System and by emailing a copy to the following email addresses:

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Dated: April 16, 2026

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