UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

DOLBY LABORATORIES, INC.,
Petitioner

v.

INTERDIGITAL MADISON PATENT HOLDINGS, SAS,
Patent Owner

Case IPR2026-00252
U.S. Patent No. 9,185,268

PATENT OWNER'S MOTION TO SEAL EXHIBIT 2006

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U.S. Patent and Trademark Office
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I. INTRODUCTION

Pursuant to 37 C.F.R. §§ 42.14 and 42.54, Patent Owner InterDigital Madison Patent Holdings, SAS ("Patent Owner") requests that the confidential version of Exhibit 2006, the Declaration of Ryan Pohlman, be sealed under 37 C.F.R. §§ 42.14 and 42.54. Patent Owner also respectfully requests entry of the Default Protective Order, attached to this Motion as Appendix A.

The parties have conferred regarding the motion to seal as required by 37 C.F.R. § 42.54(a), and Petitioner has stated that it will not oppose this motion.

II. GOVERNING RULES AND PTAB GUIDANCE

Although under 35 U.S.C. § 316(a)(1), papers filed in an *inter partes* review are generally open and available for access by the public, a party may file a concurrent Motion to Seal to protect public disclosure of certain confidential information, which has the effect of sealing the information at issue pending resolution of the motion. In determining whether to grant a Motion to Seal, the Board must find "good cause," 37 C.F.R. § 42.54(a), and "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," Trial Practice Guide[1], ("TPG"), § I.E. The Board identifies confidential information in a manner "consistent with Federal Rule of Civil Procedure 26(c)(1)(G), which provides for

[1] Available at https://www.uspto.gov/patents/ptab/trial-practice-guide

protective orders for trade secret or other confidential research, development, or commercial information." TPG, § I.E.2.

Based on the procedure set forth in the TPG, Patent Owner seeks to prevent the disclosure of sensitive information relating to Patent Owner and other third parties.

III. IDENTIFICATION OF CONFIDENTIAL INFORMATION

The confidential information at issue here comprises information in Exhibit 2006 that relates to confidential business information, including the identity of certain licensees of U.S. Patent No. 9,185,268.

Patent Owner has, to the best of its ability, limited material in Exhibit 2006 to non-confidential information. Pursuant to guidance in the TPG, Patent Owner has filed both confidential and non-confidential versions of Exhibit 2006. In the non-confidential version of Exhibit 2006, Patent Owner has redacted passages discussing the confidential information.

* * *

To the best of Patent Owner's knowledge, the information sought to be sealed has not been published or otherwise made public.

IV. GOOD CAUSE EXISTS FOR SEALING EXHIBIT 2006.

Public disclosure of the confidential information contained in Exhibit 2006 would harm Patent Owner and potentially violate confidentiality provisions. The

public interest will not be harmed by granting this Motion to Seal Exhibit 2006 as "**PROTECTIVE ORDER MATERIAL**." To the contrary, granting this Motion to Seal would achieve "a balance between the public's interest in maintaining a complete and understandable file history and the parties' interest in protecting truly sensitive information." TPG, § I.E. Furthermore, Patent Owner is concurrently filing a public, redacted version of Exhibit 2006. Therefore, good cause exists for granting this Motion to Seal.

V. RELIEF REQUESTED

For the reasons stated above, Patent Owner requests that the Board enter the Default Protective Order in this proceeding, and seal and protect the unredacted version of Exhibit 2006 under the terms of the Default Protective Order.

Respectfully submitted,

STERNE, KESSLER, GOLDSTEIN & FOX PLLC

/ Jennifer Meyer Chagnon /

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Date: April 17, 2026

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

I certify that the above-captioned **PATENT OWNER'S MOTION TO SEAL EXHIBIT 2006** was served in its entirety on April 17, 2026, upon the following parties via electronic mail:

W. Karl Renner (Lead Counsel)
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Respectfully submitted,

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Attorney for Patent Owner InterDigital Madison Patent Holdings, SAS

Date: April 17, 2026

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APPENDIX A

DEFAULT PROTECTIVE ORDER

The following Standing Protective Order will be automatically entered into the proceeding upon the filing of a petition for review or institution of a derivation:

Standing Protective Order

This standing protective order governs the treatment and filing of confidential information, including documents and testimony.

1. Confidential information shall be clearly marked "PROTECTIVE ORDER MATERIAL."

2. Access to confidential information is limited to the following individuals who have executed the acknowledgment appended to this order:

(A) Parties. Persons who are owners of a patent involved in the proceeding and other persons who are named parties to the proceeding.

(B) Party Representatives. Representatives of record for a party in the proceeding.

(C) Experts. Retained experts of a party in the proceeding who further certify in the Acknowledgement that they are not a competitor to any party, or a consultant for, or employed by, such a competitor with respect to the subject matter of the proceeding.

(D) In-house counsel. In-house counsel of a party.

(E) Other Employees of a Party. Employees, consultants or other persons performing work for a party, other than in-house counsel and in-house counsel's support staff, who sign the Acknowledgement shall be extended access to confidential information only upon agreement of the parties or by order of the Board upon a motion brought by the party seeking to disclose confidential information to that person. The party opposing disclosure to that person shall have the burden of proving that such person should be restricted from access to confidential information.

(F) The Office. Employees and representatives of the Office who have a need for access to the confidential information shall have such access without the requirement to sign an Acknowledgement. Such employees and representatives shall include the Director, members of the Board and their clerical staff, other support personnel, court reporters, and other persons acting on behalf of the Office.

(G) Support Personnel. Administrative assistants, clerical staff, court reporters and other support personnel of the foregoing persons who are reasonably necessary to assist those persons in the proceeding shall not be required to sign an Acknowledgement, but shall be informed of the terms

and requirements of the Protective Order by the person they are supporting who receives confidential information.

3. Persons receiving confidential information shall use reasonable efforts to maintain the confidentiality of the information, including:

(A) Maintaining such information in a secure location to which persons not authorized to receive the information shall not have access;

(B) Otherwise using reasonable efforts to maintain the confidentiality of the information, which efforts shall be no less rigorous than those the recipient uses to maintain the confidentiality of information not received from the disclosing party; (C) Ensuring that support personnel of the recipient who have access to the confidential information understand and abide by the obligation to maintain the confidentiality of information received that is designated as confidential; and

(D) Limiting the copying of confidential information to a reasonable number of copies needed for conduct of the proceeding and maintaining a record of the locations of such copies.

4. Persons receiving confidential information shall use the following procedures to maintain the confidentiality of the information:

(A) Documents and Information Filed With the Board.

(i) A party may file documents or information with the Board under seal, together with a non-confidential description of the nature of the confidential information that is under seal and the reasons why the information is confidential and should not be made available to the public. The submission shall be treated as confidential and remain under seal, unless, upon motion of a party and after a hearing on the issue, or sua sponte, the Board determines that the documents or information do not to qualify for confidential treatment.

(ii) Where confidentiality is alleged as to some but not all of the information submitted to the Board, the submitting party shall file confidential and non-confidential versions of its submission, together with a Motion to Seal the confidential version setting forth the reasons why the information redacted from the non-confidential version is confidential and should not be made available to the public. The nonconfidential version of the submission shall clearly indicate the locations of information that has been redacted. The confidential version of the submission shall be filed under seal. The redacted information shall remain under seal unless, upon motion of a party and after a hearing on the issue, or sua sponte, the Board determines that some or all of the redacted information does not qualify for confidential treatment.

(B) Documents and Information Exchanged Among the Parties. Information designated as confidential that is disclosed to another party during discovery or other proceedings before the Board shall be clearly marked as "PROTECTIVE ORDER MATERIAL" and shall be produced in a manner that maintains its confidentiality.

(j) Standard Acknowledgement of Protective Order. The following form may be used to acknowledge a protective order and gain access to information covered by the protective order:

[CAPTION]

Standard Acknowledgment for Access to Protective Order Material

I _____, affirm that I have read the Protective Order; that I will abide by its terms; that I will use the confidential information only in connection with this proceeding and for no other purpose; that I will only allow access to support staff who are reasonably necessary to assist me in this proceeding; that prior to any disclosure to such support staff I informed or will inform them of the requirements of the Protective Order; that I am personally responsible for the requirements of the terms of the Protective Order and I agree to submit to the jurisdiction of the Office and the United States District Court for the Eastern District of Virginia for purposes of enforcing the terms of the Protective Order and providing remedies for its breach.

[Signature]