

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

Meishan CRRC Fastening System Co., Ltd.

Petitioner,

v.

Howmet Aerospace Inc.

Patent Owner

Case: IPR2026-00268

U.S. Patent No. 11,885,358

PATENT OWNER'S MOTION TO SEAL

Patent Owner Howmet Aerospace Inc. ("Patent Owner") respectfully submits this Motion to Seal Exhibit 2006 and the confidential version of Patent Owner's Request for Discretionary Denial of Institution.

I. RELIEF REQUESTED

Pursuant to 37 C.F.R. §§ 42.14 and 42.54, and for the reason set forth below, Patent Owner requests that the confidential version of Patent Owner's Request for Discretionary Denial of Institution and Exhibit 2006 be placed under seal and subject to protective order.

II. GOOD CAUSE FOR RELIEF REQUESTED

Although "the default rule is that all papers filed in an *inter partes* review are open and available for access by the public," a party may file a motion with the Board to seal confidential information that is protected from disclosure. *Garmin v. Cuozzo*, IPR2012-00001, Paper No. 34 (PTAB March 14, 2013). "The standard for granting a motion to seal is 'for good cause.'" *Id.* (quoting 37 C.F.R. § 42.54). *See also* the Patent Trial and Appeal Board Consolidated Trial Practice Guide of November 2019 ("TPG") at 20 ("protective orders may be issued for good cause by the Board to protect a party from disclosing confidential information. 37 C.F.R. § 42.54"). "[A] movant to seal must demonstrate adequately that (1) the information sought to be sealed is truly confidential, (2) a concrete harm would result upon public disclosure, (3) there exists a genuine need to rely in the trial on the specific

information sought to be sealed, and (4), on balance, an interest in maintaining confidentiality outweighs the strong public interest in having an open record.”

Argentum Pharms. LLC v. Alcon Research, Ltd., IPR2017-01053, Paper 27 at 4 (P.T.A.B. Jan. 19, 2018) (informative).

Good cause exists here. Exhibit 2006 provides materials produced by Petitioner to Patent Owner and marked as “CONFIDENTIAL PROTECTIVE ORDER MATERIAL” by Petitioner. Furthermore, the confidential version of Patent Owner's Request for Discretionary Denial of Institution references and quotes the confidential materials provided in Exhibit 2006. A redacted version of Patent Owner's Request for Discretionary Denial of Institution will also be filed and made public.

To the best of Patent Owner's knowledge Exhibit 2006 and redacted portions of the confidential version of Patent Owner's Request for Discretionary Denial of Institution are indeed confidential, and the information sought to be sealed has not been published or otherwise made public. Courts routinely seal this type of correspondence. The public interest will not be harmed by granting this Motion to Seal. 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.” 77 Fed. Reg. 48,755, 48,760 (Aug. 14, 2012). Accordingly, the interest in confidentiality outweighs the

public interest in having an open record regarding this information. Exhibit 2006 and the confidential version of Patent Owner's Request for Discretionary Denial of Institution should therefore be sealed.

III. CONCLUSION

For the reasons set forth above, Patent Owner respectfully requests the Board grant its motion to seal Exhibit 2006 and the confidential version of Patent Owner's Request for Discretionary Denial of Institution.

Respectfully submitted,
GREENBERG TRAURIG, LLP

Date: June 12, 2026

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CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of this Motion to Seal has been served on the following:

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Respectfully submitted,
GREENBERG TRAURIG, LLP

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