

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

IPR2026-00268
U.S. Patent No. 11,885,358

PETITIONER'S MOTION TO SEAL

Petitioner Meishan CRRC Fastening System Co. Ltd. (“Petitioner”) respectfully moves to seal the confidential version of its Sur-Reply to Patent Owner’s Reply to Request for Discretionary Denial (“Sur-Reply”). Petitioner files this Motion because the confidential version of its Sur-Reply necessarily paraphrases and discusses information that Patent Owner previously filed under seal, including Exhibits 2004 and 2006 and corresponding portions of Patent Owner’s Sealed Reply for Request for Discretionary Denial, as well as previously filed under seal Exhibit 1032.

Petitioner has met and conferred with Patent Owner Howmet Aerospace Inc. regarding this Motion, and Patent Owner does not oppose this Motion.

I. RELIEF REQUESTED

Pursuant to 37 C.F.R. §§ 42.14 and 42.54, and for the reasons set forth below, Petitioner requests that the confidential version of its Sur-Reply be placed under seal and subject to protective order. Petitioner is concurrently filing a public version of its Sur-Reply containing only narrowly tailored redactions of confidential information.

II. GOOD CAUSE FOR RELIEF REQUESTED

A motion to seal may be granted upon a showing of good cause, including where the information constitutes confidential commercial information. 37 C.F.R. § 42.54(a)(7). The standard for granting a motion to seal is “for good cause.”

Garmin v. Cuozzo, IPR2012-00001, Paper 34 (PTAB March 14, 2013) (quoting 37 C.F.R. § 42.54). The party moving to seal may show “good cause” by demonstrating “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 for maintaining these materials under seal.

First, the information sought to be sealed is confidential commercial information, much of which the Board has already permitted the parties to file under seal. The confidential version of Petitioner’s Sur-Reply necessarily references and discusses Exhibit 2006, which Patent Owner previously filed under seal, as well as Exhibit 1032, which references Petitioner’s confidential business information.

- i. Exhibit 2006 contains Petitioner’s confidential commercial information designated “CONFIDENTIAL PROTECTIVE ORDER MATERIAL,” including corporate governance materials, internal meeting summaries, a renewed employment contract, ownership information, and financial records relating to legal services.

- ii. Exhibit 1032 references Exhibit 2006 and contains Petitioner's confidential commercial information designated "CONFIDENTIAL PROTECTIVE ORDER MATERIAL."

Second, disclosing this information would result in concrete harm to the parties. As detailed above, Petitioner's Sur-Reply discloses the parties' confidential business information. Public disclosure could harm the competitive interests of Petitioner by revealing nonpublic information concerning business relationships, internal corporate affairs, ownership information, and financial matters.

Third, Petitioner has a genuine need to rely on this information to respond directly to Patent Owner's Reply for Request for Discretionary Denial. In particular, Patent Owner relies on Exhibit 2006 in support of its discretionary denial arguments. Petitioner cannot fully respond without discussing the same confidential information.

Finally, the balance of interests favors maintaining these limited materials under seal. Specifically, the rules aim to balance "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. The public's interest in maintaining a complete and understandable file history is satisfied when the parties file public versions of the documents with redactions limited to confidential business information, "so the record may remain clear and

reasonably open.” *Samsung Elcs. Co. v. OuraRing, Inc.*, IPR2024-01077, Paper 47, at 58-59 (P.T.A.B. Dec. 15, 2025). Petitioner is filing a public version of its Sur-Reply containing only narrowly tailored redactions, thereby preserving a complete and understandable public record while protecting genuinely confidential commercial information. Accordingly, the limited sealing requested here is narrowly tailored and satisfies the “good cause” standard.

III. CONCLUSION

For the foregoing reasons, Petitioner respectfully requests that the Board grant its Motion to Seal.

Date: July 23, 2026

Respectfully submitted,

/Cyrus A. Morton/
Cyrus A. Morton

Cyrus A. Morton
Reg. No. 44,954
Robins Kaplan LLP
2800 LaSalle Plaza
800 LaSalle Avenue
Minneapolis, MN 55402

Li Zhu
Reg. No. 73,465
Robins Kaplan LLP
555 Twin Dolphin Drive
Suite 310
Redwood City, CA 94065

Attorneys for Petitioner

CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing document(s) was served on July 23, 2026, at the following addresses:

Heath J. Briggs (Reg. No. 54,919)
BriggsH@gtlaw.com

Scott Bornstein
Scott.Bornstein@gtlaw.com

Trenton A. Ward (Reg. No. 59,157)
Trenton.Ward@gtlaw.com

Joseph Agostino (Reg. No. 51,191)
Joseph.Agostino@gtlaw.com

/ Cyrus A. Morton /

Cyrus A. Morton
Reg. No. 44,954
Robins Kaplan LLP
cmorton@robinskaplan.com

Attorney for Petitioner