UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

GOOGLE LLC,
Petitioner,

v.

ACCUSEARCH TECHNOLOGIES LLC,
Patent Owner.

IPR2026-00288
U.S. Patent No. 11,100,184

PATENT OWNER'S MOTION TO SEAL
PURSUANT TO 36 C.F.R. § 42.54

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Cases

Argentum Pharms. LLC v. Alcon Research, Ltd.,
IPR2017-01053, Paper 27 (PTAB Jan. 19, 2018) 2

Corning Optical Communications RF, LLC, v. PPC Broadband, Inc.,
IPR2014-00440, Paper 47 (PTAB Apr. 14, 2015) 2

Garmin Int'l, Inc. v. Cuozzo Speed Techs. LLC,
IPR2012-00001, Paper 34 (PTAB Mar. 14, 2013) 2

Other Authorities

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I. INTRODUCTION

This motion seeks to seal Exhibits 2004 and 2013 and redact the corresponding portions of Patent Owner's discretionary denial brief discussing these exhibits.

Patent Owner's Exhibit 2004 is a June 27, 2017 email from noreply@google.com to gustavo@rzv-IP.com. Petitioner produced this document in the copending district court litigation with a designation of "HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY." Patent Owner's Exhibit 2013 is a September 25, 2017 email from noreply@google.com to gustavo@rzv-ip.com. Petitioner produced this document in the copending district court litigation with a designation of "CONFIDENTIAL " Patent Owner's discretionary denial brief also contains quotations from and discussions of Exhibits 2004 and 2013.

Pursuant to 37 C.F.R. §§ 42.14 and 42.54, Patent Owner has conferred with Petitioner regarding entry of a protective order in this proceeding. The parties have agreed to the Board's Default Protective Order and have also agreed that Exhibits 2004 and 2013 should be designated "PROTECTIVE ORDER MATERIAL" under the Board's Default Protective Order. Patent Owner moves to seal portions of Patent Owner's Preliminary Response and Exhibit 2004 and submits that good cause exists for the Board to grant the motion and enter the Board's Default Protective Order.

II. GOOD CAUSE EXISTS TO GRANT PATENT OWNER'S MOTION TO SEAL

The Board may grant a motion to seal "for good cause." 37 C.F.R. § 42.54; *Garmin Int'l, Inc. v. Cuozzo Speed Techs. LLC*, IPR2012-00001, Paper 34 at 3 (PTAB Mar. 14, 2013). To establish "good cause," the moving party must demonstrate the following factors:

(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.

See also Argentum Pharms. LLC v. Alcon Research, Ltd., IPR2017-01053, Paper 27 at 4 (PTAB Jan. 19, 2018) (informative) (citations omitted); *see also Corning Optical Communications RF, LLC, v. PPC Broadband, Inc.*, IPR2014-00440, Paper 47 at 3 (PTAB Apr. 14, 2015).

Here, Patent Owner's Exhibit 2004 is a June 27, 2017 email from noreply@google.com to gustavo@rzv-IP.com. Petitioner produced this document in the copending district court litigation with a designation of "HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY." Patent Owner's Exhibit 2013 is

a September 25, 2017 email from noreply@google.com to gustavo@rzv-ip.com. Petitioner produced this document in the copending district court litigation with a designation of "CONFIDENTIAL " Both parties have agreed that these exhibits are truly confidential and that a concrete harm would result to the parties if publicly disclosed. Patent Owner's discretionary denial brief also includes excerpts from Exhibits 2004 and 2013 that quote and discuss the substance of these exhibits

Patent Owner has a genuine need to rely on the confidential material in this proceeding. The information in Exhibits 2004 and 2013 is directly relevant to the issue of settled expectations in this IPR.

In order to minimize the burden on the public's interest in an open record, Patent Owner is concurrently filing a sealed discretionary denial brief along with a publicly-available discretionary denial brief redacting the limited confidential information from Exhibits 2004 and 2013 discussed in the brief. Patent Owner requests to seal Exhibits 2004 and 2013 in their entirety.

III. PROPOSED PROTECTIVE ORDER

Patent Owner has attached, as Exhibit 2014, a copy of the Board's Default Protective Order. The parties accept and agree to use the Board's Default Protective Order for this proceeding.

IV. CERTIFICATION OF CONFERENCE

Patent Owner certifies that pursuant to 37 C.F.R. § 42.54(a), it has conferred with Petitioner, and Petitioner does not oppose this motion.

V. CONCLUSION

For the foregoing reasons, Patent Owner respectfully requests that the Board grants Patent Owner's motion to seal Exhibits 2004 and 2013 and redact the portions of Patent Owner's discretionary denial brief discussing these exhibits.

Dated: May 18, 2026

Respectfully submitted,

By:*/ Stephen McBride /*

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CERTIFICATE OF SERVICE

I hereby certify, pursuant to 37 C.F.R. section 42.6, that on May 18, 2026, a complete copy of the foregoing PATENT OWNER'S MOTION TO SEAL PURSUANT TO 36 C.F.R. § 42.54 and EXHIBITS 2004, 2013, and 2014 were served by electronic mail, as agreed to by the parties, upon the following:

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Dated: May 18, 2026

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