

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

TWITCH INTERACTIVE, INC.
Petitioner,

v.

CP STUDIOS LLC
Patent Owner.

Patent No. 10,632,388

Inter Partes Review No. IPR2026-00397

PETITIONER'S MOTION TO SEAL

Petitioner's Updated Exhibit List

Exhibit Description	Exhibit #
U.S. Patent No. 10,632,388 to Wiklem et al. ("388 patent")	EX1001
Expert Declaration of Dr. Henry Houh	EX1002
File History of U.S. Patent No. 10,632,388	EX1003
Angela Morales <i>et al.</i> , "FarmVille For Dummies" (Wiley Publishing, 2011) ("FarmVille")	EX1004
Chris Herbert, "Kickstarter Project – Tweet Land: Playing With Reality", available at https://web.archive.org/web/20111010055037/https://www.macstories.net/news/kickstarter-project-tweet-land-playing-with-reality/ , Internet Archive ("Tweet Land")	EX1005
U.S. Patent No. 8,671,019 to Barclay ("Barclay '019")	EX1006
U.S. Patent Pub. No. 2012/0184363 to Barclay ("Barclay '363")	EX1007
U.S. Patent No. 8,790,182 to Ajami <i>et al.</i> ("Zynga patent")	EX1008
John Shedletsy, "Be Our Guest; Buy Our ROBUX", available at https://web.archive.org/web/20120305011624/http://blog.roblox.com/2008/09/be-our-guest-buy-our-robux/ , Internet Archive	EX1009
Villalobos <i>et al.</i> , "Tweet Land – The first set of games that play with reality!", available at https://web.archive.org/web/20110808172606/http://www.kickstarter.com/projects/nestorvc/tweet-land-the-first-set-of-games-that-play-with-r , Internet Archive	EX1010
Daniella Jaeger, "Creator Q&A: Tweet Land", available at https://web.archive.org/web/20110810091733/https://www.kickstarter.com/blog/creator-q-a-tweet-land , Internet Archive	EX1011

Exhibit Description	Exhibit #
Amit Bhawani, “Play FarmVille Game on iphone & iPad – Free App”, available at https://web.archive.org/web/20100627153509/http://www.amitbhawani.com/blog/play-farmville-iphone-ipad/ , Internet Archive	EX1012
SEC Filing, Developer Addendum No. 2 By and Between Facebook, Inc. and Zynga Inc., available at https://web.archive.org/web/20111103054838/https://www.sec.gov/Archives/edgar/data/1439404/000119312511190294/dex1016.htm , Internet Archive	EX1013
Jared Nelson, “‘Tweet Land’ Review – A Great Idea, but Flawed Gameplay”, available at https://web.archive.org/web/20120206054222/https://toucharcade.com/2012/02/03/tweet-land-review/ , Internet Archive	EX1014
U.S. Patent No. 9,017,169 to Kelly <i>et al.</i>	EX1015
Kellie Cardwell-Winters, “FarmVille Walkthrough”, available at https://www.gamezebo.com/walkthroughs/farmville-walkthrough/	EX1016
Calin, “FarmVille Barn Raising Adds More Storage!”, available at https://web.archive.org/web/20100114103010/https://www.unigamesity.com/farmville-barn-raising-adds-more-storage/ , Internet Archive	EX1017
U.S. Patent No. 9,889,373 to Wiklem <i>et al.</i>	EX1018
Chris Herbert, “Kickstarter Project – Tweet Land: Playing With Reality”, available at https://www.macstories.net/news/kickstarter-project-tweet-land-playing-with-reality/	EX1019
RESERVED	EX1020
Declaration of Tony Corsini on the scanned pages of Angela Morales <i>et al.</i> , “FarmVille For Dummies” (Wiley Publishing, 2011)	EX1021

Exhibit Description	Exhibit #
Peter Kafka, “Twitch’s CEO on its biggest competition, Big Tech’s growth-at-all-costs mindset, and why Twitter isn’t really a town square”, available at https://www.businessinsider.com/twitch-ceo-dan-clancy-profitability-livestreaming-future-under-amazon-2025-3	EX1022
Stream Hatchet, “2025 Yearly Live-Streaming Trends Report”, available at https://streamhatchet.com/reports/2025-yearly-report-in-live-streaming-trends/	EX1023
Declaration of Mina Ching on the wayback archived webpages https://web.archive.org/web/20100627153509/http://www.amitbhawan.i.com/blog/playfarmville-iphone-ipad/ , https://web.archive.org/web/20111010055037/https://www.macstories.net/news/kickstarter-project-tweet-land-playing-with-reality/ , https://web.archive.org/web/20120206054222/https://toucharcade.com/2012/02/03/tweet-land-review/ , https://web.archive.org/web/20110808172606/http://www.kickstarter.com/projects/nestorvc/tweet-land-the-first-set-of-games-that-play-with-r , https://web.archive.org/web/20110810091733/https://www.kickstarter.com/blog/creator-q-a-tweet-land , https://web.archive.org/web/20110524231942/https://toucharcade.com/2011/04/15/curious-kickstarter-funded-ios-game-tweet-land-surfaces/ , https://web.archive.org/web/20111103054838/https://www.sec.gov/Archives/edgar/data/1439404/000119312511190294/dex1016.htm , https://web.archive.org/web/20100114103010/https://www.unigamesity.com/farmville-barn-raising-adds-more-storage/ , https://web.archive.org/web/20120305011624/http://blog.roblox.com/2008/09/be-our-guest-buy-our-robux/ , Internet Archive	EX1024
<i>CP Studios LLC v. Twitch Interactive, Inc.</i> , No. 1:26-cv-00571-MN, (D. Del. Sep. 10, 2026), ECF 24 (Scheduling Order)	EX1025 (NEW)
Emmett Shear, “16 years of Twitch”, available at https://blog.twitch.tv/en/2023/03/16/16-years-of-twitch/	EX1026 (NEW)

Exhibit Description	Exhibit #
Alexis Ohanian, “Startup School Radio, Episode 2: How Justin.tv Became Twitch”, available at https://www.ycombinator.com/blog/startup-school-radio-episode-2-how-justin-dot-tv-became-twitch	EX1027 (NEW)
Twitch, “Twitch is 4 th in Peak US Internet Traffic”, available at https://blog.twitch.tv/en/2014/02/05/twitch-is-4th-in-peak-us-internet-traffic-90b1295af358/	EX1028 (NEW)
Drew FitzGerald <i>et al.</i> , “Apple Quietly Builds New Networks,” available at https://www.wsj.com/articles/SB10001424052702304851104579361201655365302	EX1029 (NEW)
Amazon.com, Inc., “Amazon.com to Acquire Twitch,” available at https://press.aboutamazon.com/2014/8/amazon-com-to-acquire-twitch	EX1030 (NEW)
Twitch, “An Update to Several Streamer Payout Programs,” available at https://blog.twitch.tv/en/2024/01/24/an-update-to-several-streamer-payout-programs/	EX1031 (NEW)
2025 U.S. Creator Number and Payout [CONFIDENTIAL]	EX1032 (NEW)
November 16, 2018 Letter from CP Studios LLC	EX1033 (NEW)
December 17, 2018 Reply from Twitch/Amazon	EX1034 (NEW)
File History of U.S. Patent No. 9,604,132	EX1035 (NEW)
Proposed Modified Protective Order (clean version)	EX1036 (NEW)
Proposed Modified Protective Order (marked-up version)	EX1037 (NEW)

Pursuant to 37 C.F.R. §§ 42.14 and 42.54, Petitioner Twitch Interactive, Inc. (“Petitioner” or “Twitch”) submits this Motion to Seal Petitioner’s Opposition to Patent Owner’s Request for Discretionary Denial (“Opposition”) and Exhibit 1032 thereto, all of which are being concurrently filed under seal with this Motion.

I. GOOD CAUSE EXISTS FOR SEALING PETITIONER’S OPPOSITION AND EXHIBIT 1032 CONTAINING CONFIDENTIAL INFORMATION

Confidential information is protected against public disclosure. 35 U.S.C. § 316(a)(7); 37 C.F.R. § 42.54. Petitioner submits that Exhibit 1032 contains Petitioner’s highly confidential and non-public information concerning the business and financial information of Petitioner, specifically the number of U.S. creators earning revenue and the total paid to U.S. creators by month. The disclosure of this information is likely to significantly harm Petitioner’s competitive position in its view, thereby providing good cause for sealing Exhibit 1032.

Exhibit 1032 therefore qualifies for “PROTECTIVE ORDER MATERIAL” protection under the Modified Protective Order. The portions of Petitioner’s Opposition that describe or quote this Exhibit likewise qualify for the same protection.

Thus, Petitioner's Opposition and Exhibit 1032 should be sealed under 37 C.F.R. § 42.54. Petitioner is filing a redacted version of its Petitioner's Opposition and Exhibit 1032 to the public docket.

II. CERTIFICATION OF NON-PUBLICATION

To the best of Petitioner's knowledge, the information sought to be sealed by this Motion has not been published or otherwise made publicly available.

III. CERTIFICATION OF MEET AND CONFER

Pursuant to 37 C.F.R. § 42.54, Petitioner corresponded with Patent Owner's counsel on October 5 and 6. Patent Owner's counsel indicated it wished to first review the confidential information but that, in the interim, it will not share the confidential information marked under the proposed protective order with its client.

IV. CONCLUSION

For the foregoing reasons, Petitioner respectfully requests that the Board seal and protect the confidential information contained in Petitioner's Opposition and Exhibit 1032. Petitioner further requests that the Board provisionally seal and protect the confidential information until such time as it receives and rules on this Motion and the accompanying Motion for Entry of Modified Protective Order.

IPR2026-00397

Patent No. 10,632,388

Dated: October 6, 2026

Respectfully submitted,

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CERTIFICATE OF SERVICE (37 C.F.R. § 42.6(e)(4))

I hereby certify that the attached PETITIONER'S MOTION TO SEAL was served as of the below date on the via email (by agreement) to the following counsel of record for Patent Owner:

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