

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

UATP IP, LLC,
Petitioner,

v.

SLICK SLIDE LLC,
Patent Owner.

Case PGR2024-00054
Patent 11,998,854

PETITIONER'S MOTION TO SEAL

LIST OF EXHIBITS

UATP-1001	U.S. Patent No. 11,998,854 to Schmit (“the ’854 patent”)
UATP-1002	Excerpts from the Prosecution History of the ’854 Patent (“the Prosecution History”)
UATP-1003	Declaration of Dr. Youjiang Wang
UATP-1004	U.S. Patent No. 7,896,779 to Phillips (“Phillips”)
UATP-1005	U.S. Patent Publication No. 2023/0129814 to Fallgatter (“Fallgatter”)
UATP-1006	<i>WN0400 – 400 Micron Nylon Mesh 45% Open Area</i> , Industrial Netting product page, archived by Internet Archive Wayback Machine on July 28, 2021 (https://web.archive.org/web/20210728222259/https://www.industrialnetting.com/wn0400-400-micron-nylon-woven-mesh.html) (“WN0400”)
UATP-1007	<i>Woven Mesh: Nylon, Polyester or Polypropylene Plastic Mesh</i> , Industrial Netting, archived by Internet Archive Wayback machine on June 21, 2021 (https://web.archive.org/web/20210621025620/https://www.industrialnetting.com/woven-mesh.html)
UATP-1008	<i>6.2 Friction</i> , University Physics Volume 1, openstax (retrieved from https://openstax.org/books/university-physics-volume-1/pages/6-2-friction)
UATP-1009	V.K. Kothari et al., <i>Assessment of frictional properties of some woven fabrics</i> , Indian Journal of Fibre and Textile Research, Vol. 19 (September 1994) 151-155
UATP-1010	W. Żurek et al., <i>Surface Frictional Resistance of Fabrics Woven from Filament Yarns</i> , Textile Research Journal, Vol. 55, No. 2 (1985), 113-121

- UATP-1011 W.D. Callister, *Materials Science and Engineering An Introduction*, ed. 7, John Wiley & Sons, Inc. (2007)
- UATP-1012 *WN0400 – 400 Micron Nylon Mesh 45% Open Area*, Industrial Netting product page, accessed at <https://www.industrialnetting.com/wn0400-400-micron-nylon-woven-mesh.html>
- UATP-1013 M. Watanabe, et al., *The Frictional Properties of Nylon*, *Wear*, 12 (1968) 185-191
- UATP-1014 British Patent Publication No. 402,259 to Wicksteed
- UATP-1015 *World's First Children's slide*, BBC NewsRound, April 17, 2012 (retrieved from <https://www.bbc.co.uk/newsround/17747678>)
- UATP-1016 A.F.W. Coulson, et al., *Frictional Properties of Nylon Yarn and Their Relation to the Function of Textile Guides*, *Journal of the Textile Institute Proceedings*, 46:1 (January 7, 2009), 101-111
- UATP-1017 R. Kisiel, *Somebody call elf 'n' safety, standards are on the slide!*, DailyMail, April 17, 2012 (retrieved from <https://www.dailymail.co.uk/news/article-2130923/Historians-discover-worlds-childrens-slide-built-90-years-ago-plank-wood.html>)
- UATP-1018 R. Allain, *Fair Physics: The Big Slide*, Wired (June 3, 2011) (retrieved from <https://www.wired.com/2011/06/fair-physics-the-big-slide/>)
- UATP-1019 L. Nichols, *The Physics of a Playground Slide*, Sciencing.com (April 24, 2017) (retrieved from <https://sciencing.com/physics-playground-slide-8657662.html>)
- UATP-1020 R. Allain, *The Physics of Going Fast –but Not Too Fast – on a Giant Slide*, Wired (September 23, 2022) (retrieved from <https://www.wired.com/story/the-physics-of-going-fast-but->

not-too-fast-on-a-giant-slide/)

- UATP-1021 PTC Windchill Risk and Reliability Desktop Help Center, *Friction Coefficients*, (retrieved from https://support.ptc.com/help/wrr/r12.0.2.0/en/index.html#page/wrr/ReferenceGuide/prediction/friction_coefficients.html)
- UATP-1022 U.S. Patent No. 5,246,401 to Boatwright
- UATP-1023 U.S. Patent No. 6,142,879 to Phillips
- UATP-1024 U.S. Patent No. 8,695,994 to Maratta
- UATP-1025 U.S. Patent No. 6,231,483 to Phillips
- UATP-1026 *Friction: Friction Coefficients and Calculator*, The Engineering Toolbox (2004) (retrieved from https://www.engineeringtoolbox.com/friction-coefficients-d_778.html)
- UATP-1027 P.J. Blau et al., *Appendix: Static and Kinetic Coefficients for Selected Materials*, ASM Handbook vol. 18 (1992) 70-75
- UATP-1028 N.P. Suh & M. Mosleh, *The Minimum Coefficient of Friction: What Is It?*, CIRP Annuals, Vol. 43, Issue 1 (1994) 491-495
- UATP-1029 *Kings Island's Ultimate Fansite!*, King Island Central (retrieved from <https://kicentral.com/parkhistory/past-attractions/scrappys-slides/>)
- UATP-1030 S. Murphy, *Is that the same giant slide we got on as children?*, Detroit Historical Society, September 9, 2022 (retrieved from <https://detroithistorical.org/blog/2022-09-09-%E2%80%9Csame-giant-slide-we-got-children%E2%80%9D>)
- UATP-1031 Declaration of Nathaniel E. Frank-White re Internet Archive record of Industrial Netting websites corresponding to UATP-1006 and UATP-1007

- UATP-1032 Industrial Netting Home page, archived by Internet Archive on July 28, 2021
(<https://web.archive.org/web/20210728223652/https://www.industrialnetting.com/>)
- UATP-1033 Industrial Netting Nylon page, archived by Internet Archive on May 29, 2022
(<https://web.archive.org/web/20220529115425/https://www.industrialnetting.com/nylon.html>)
- UATP-1034 *Sailcloth*, Dictionary.com entry (retrieved from <https://www.dictionary.com/browse/sailcloth>)
- UATP-1035 Industrial Netting YouTube page, archived by Internet Archive on July 2, 2022
(<https://web.archive.org/web/20220702033025/https://www.youtube.com/user/IndustrialNetting/about>)
- UATP-1036 Industrial Netting Home page – screenshot of dropdown menu, archived by Internet Archive on July 28, 2021
(<https://web.archive.org/web/20210728223652/https://www.industrialnetting.com/>)
- UATP-1037 *Mesh*, Dictionary.com entry (retrieved from <https://www.dictionary.com/browse/mesh>)
- UATP-1038 *Fabric*, Dictionary.com entry (retrieved from <https://www.dictionary.com/browse/fabric>)
- UATP-1039 Liu et al., *Preparation and Tribological Properties of Modified MoS₂/SiC/Epoxy Composites*, Materials 2021, 14, 1731
- UATP-1040 Brostow et al., *Modified Epoxy Coatings on Mild Steel: Tribology and Surface Energy*, European Polymer Journal, 2010, 46, 2181-2189
- UATP-1041 Kumar et al., *Tribological Studies of Epoxy Composites with Solid and Liquid Fillers*, Tribology International, 2017, 105, 27-36

UATP-1042	Declaration of June Ann Munford
UATP-1043	Supplemental Declaration of Dr. Youjiang Wang
UATP-1044	Second Declaration of Dr. Youjiang Wang
UATP-1045	Deposition Transcript of Dr. Rust, October 22, 2025
UATP-1046	Deposition Transcript of Dr. Spiegelberg, October 30, 2025
UATP-1047	Deposition Transcript of Mr. Schmit, November 10, 2025
UATP-1048	Cruising Genoa: Voyager Cross-Cut (retrieved from https://www.uksailmakers.com/cruising/genoas/voyager-genoa/)
UATP-1049	I Tried EVERY SLIDE At Slick City! (Jul. 10, 2024), available at I Tried EVERY SLIDE At Slick City! - YouTube
UATP-1050	Franchisetimes.com, <i>Former Sky Zone Franchisee Launches Slick City as Slide-Centric Indoor Park Franchise</i> (April 2, 2024) (retrieved from https://www.franchisetimes.com/franchise_news/former-sky-zone-franchisee-launches-slick-city-as-slide-centric-indoor-park-franchise/article_544416ba-f0f1-11ee-80ba-93e32416194b.html)
UATP-1051	Types of Metal Mesh Sheets (retrieved from https://www.sanghvioverseas.com/blog/types-of-metal-mesh-sheets/)
UATP-1052	What Is A Metal Mesh Sheet?, archived by Internet Archive on Oct. 21, 2020 (https://web.archive.org/web/20201021012700/https://www.anbmetal.com/what-is-a-metal-mesh-sheet)
UATP-1053	Types of Metal Mesh Sheets 100 Mesh Paint Nylon Mesh Filter Woven Net Sheet Filter Cloth (39"x39") (retrieved from

<https://www.amazon.com/WorkBless-Paint-Nylon-Filter-Woven/dp/B0F3CT1T8Y>)

- UATP-1054 SAILCLOTH (retrieved from <https://bainbridgeintusa.com/wp-content/uploads/2022/08/HSX-V.pdf>)
- UATP-1055 *Slick Slide, LLC v. Wittman et al*, Exhibit C – Redacted Schmit Deposition Excerpts, 1:23-cv-01486-WCG (Filed June 2, 2025)
- UATP-1056 GB Patent No. 2,623,710 to Schmit (“Schmit-710”)
- UATP-1057 IYU SAILCLOTH TEST REPORT: TECHNICAL DATA SHEET (retrieved from <https://iyusailcloth.com/pdf/TECHNICAL%20DATA%20SHEET-0412%20IYU.pdf>)
- UATP-1058 Video, Go down feet first or headfirst if you dare on our Mega Launch Slide! (Jul. 16, 2020), *available at* <https://www.facebook.com/skyzonemurfreesboro/videos/go-down-feet-first-or-headfirst-if-you-dare-on-our-mega-launch-slide/321287338875863/>
- UATP-1059 Sky Zone Murfreesboro Facebook Post (July 16, 2020), *available at* <https://www.facebook.com/skyzonemurfreesboro/videos/go-down-feet-first-or-headfirst-if-you-dare-on-our-mega-launch-slide/321287338875863/>
- UATP-1060 Video, Mega Launch Slide (Jul. 2, 2020), *available at* <https://www.facebook.com/skyzonemurfreesboro/videos/mega-launch-slide/332740041052911/>
- UATP-1061 Sky Zone Murfreesboro Facebook Post (July 2, 2020), *available at* <https://www.facebook.com/skyzonemurfreesboro/videos/mega-launch-slide/332740041052911/>
- UATP-1062 Video, Go down feet first or headfirst if you dare on our Mega Launch Slide! (Sep. 14, 2021), *available at*

<https://www.facebook.com/skyzonepeoriaaz/videos/mega-launch-skyzone-trampoline-indoorplayground-slide-megalaunch-birthday-birthd/605351337297363/>

- UATP-1063 Sky Zone (Peoria, AZ) Facebook Post (Sept. 14, 2021),
available at
<https://www.facebook.com/skyzonepeoriaaz/videos/mega-launch-skyzone-trampoline-indoorplayground-slide-megalaunch-birthday-birthd/605351337297363/>
- UATP-1064 Video, MEGA LAUNCH SLIDE (Sep. 29, 2020), *available at*
<https://www.facebook.com/skyzonepeoriaaz/videos/364593258002015/>
- UATP-1065 Sky Zone (Peoria, AZ) Facebook Post (Sep. 29, 2020),
available at
<https://www.facebook.com/skyzonepeoriaaz/videos/364593258002015/>
- UATP-1066 Video, Open Jump Mega Launch (Sep. 10, 2020), *available at*
<https://www.facebook.com/skyzonepeoria/videos/open-jump-mega-launch/773021073484766/>
- UATP-1067 Sky Zone (Peoria, AZ) Facebook Post (Sep. 10, 2020),
available at
<https://www.facebook.com/skyzonepeoria/videos/open-jump-mega-launch/773021073484766/>
- UATP-1068 Video, racing' on the Grand Prix Slides (Jun. 11, 2021),
available at
<https://www.facebook.com/SkyZoneFortLauderdale/videos/racing-on-the-grand-prix-slides/1169091470198731/>
- UATP-1069 New Attraction! Grand Prix In Fort Lauderdale, FL, archived
by Internet Archive on Oct. 20, 2020
(<https://web.archive.org/web/20211020192013/https://www.skyzone.com/fortlauderdale/attractions/grand-prix/>)

UATP-1070	Joint Written Consent (Dec. 27, 2022) (redacted-Protective Order Material-Attorney's Eyes Only)
UATP-1071	Joint Written Consent (Dec. 27, 2022) (redacted-Protective Order Material-Attorney's Eyes Only) and Declaration of Stephen Polozola re Authentication of Joint Written Consent
UATP-1072	Mega Launch In Murfreesboro, TN, archived by Internet Archive on Sep. 22, 2020 (https://web.archive.org/web/20200922195857/https://www.skymzone.com/murfreesboro/attractions/mega-launch)
UATP-1073	Come Fly With Us! Mega Launch 16 Feet of Drop and 17 Feet of Flight! archived by Internet Archive on Sep. 22, 2020 (https://web.archive.org/web/20200922013400/https://www.skymzone.com/peoria)
UATP-1074	RESERVED
UATP-1075	RESERVED
UATP-1076	Joint Proposed Protective Order
UATP-1077	Redline of Joint Proposed Protective Order
UATP-1078	Transcript of December 4, 2025 Teleconference
UATP-1079	Confidential and Redacted Transcript of December 22, 2025 Teleconference (Protective Order Material-Attorney's Eyes Only)
UATP-1080	Petitioner's Demonstrative Exhibits
UATP-1081	Confidential and Redacted Checks (Protective Order Material-Attorney's Eyes Only)
UATP-1082	Confidential and Redacted Invoices (Protective Order Material- Attorney's Eyes Only)

UATP-1083 Declaration of Stephen Polozola, January 30, 2026 (Protective
Order Material – Attorney’s Eyes Only)

I. INTRODUCTION

Petitioner UATP IP, LLC (“UATP”) respectfully requests portions of Petitioners Opposition to Motion for Discovery and Petitioner’s Exhibits 1081, 1082, and 1083 be sealed under 37 C.F.R. § 42.54. Good cause exists to seal these documents because the documents contain sensitive, non-public information.

II. THE DOCUMENTS REQUESTED TO BE SEALED CONTAIN CONFIDENTIAL BUSINESS INFORMATION

In determining whether to grant a Motion to Seal, the Board must find “good cause.” 37 C.F.R. § 42.20(c). The Board has explained that “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 Pharmaceuticals LLC v. Alcon Research, Ltd.*, IPR2017-01053, Paper 27 at 4 (PTAB Jan. 19, 2018) (informative).

A. Identification of Documents and Information Requested to be Sealed

UATP respectfully moves to seal confidential information including non-public business and financial information of UATP. The information appears in Exhibits 1081 and 1082 and is discussed in the Opposition Brief and Exhibit 1083.

B. Good Cause Exists for Sealing the Confidential Information

The Board's rules identify confidential information in a manner consistent with Federal Rule of Civil Procedure 26(c)(1)(G), which provides for protective orders for trade secret or other confidential research, development, or commercial information. Office Patent Trial Practice Guide, 77 Fed. Reg. 48,756, 48,760 (Aug.14, 2012). Here, the information that UATP seeks to seal relates to information that relates to non-public commercial information of UATP including confidential business and financial information. The information is truly confidential and a concrete harm would result upon public disclosure. The information is contained in the following documents:

- Exhibit 1081
- Exhibit 1082
- Exhibit 1083
- Petitioner's Opposition to Patent Owner's Motion for Discovery

Each of these documents includes non-public commercial and business information related to UATP. Accordingly, on balance, an interest in maintaining confidentiality outweighs the strong public interest in having an open record and there is good cause to grant this motion to seal to maintain the confidentiality of the information.

III. CERTIFICATION OF NON-PUBLICATION

The undersigned counsel certifies the information sought to be sealed by this Motion to Seal has not, to their knowledge, been published or otherwise made public.

IV. CONCLUSION

For these reasons, UATP respectfully requests that the Board grant Petitioner's Motion to Seal. UATP further requests that the Board seal and protect the confidential information in these exhibits and papers until such time as it receives and rules on this Motion.

Respectfully submitted,

Date: January 30, 2026

/Thomas A. Rozylowicz/
W. Karl Renner, Reg. No. 41,265
Thomas A. Rozylowicz, Reg. No. 50,620
Craig A. Deutsch, Reg. No. 69,264
Kiersten M. Batzli, Reg. No. 75,476
Fish & Richardson P.C.
60 South Sixth Street, Suite 3200
Minneapolis, MN 55402
T: 202-783-5070
F: 877-769-7945

Attorneys for Petitioner

CERTIFICATE OF SERVICE

Pursuant to 37 CFR §42.6(e)(4), the undersigned certifies that on January 30, 2026, a complete and entire copy of this Petitioner's Motion to Seal was provided via email, to the Patent Owner by serving the email correspondence addresses of record as follows:

Brett A. Schatz
Louis H. Sitler
Wood, Herron & Evans LLP
600 Vine Street Suite 2800
Cincinnati, OH 45202

Email: bschatz@whe-law.com
lsitler@whe-law.com

/Esther Goldschlager/
Esther Goldschlager
Fish & Richardson P.C.
60 South Sixth Street, Suite 3200
Minneapolis, MN 55402
goldschlager@fr.com