

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
U.S. Patent No. 11,998,854

PATENT OWNER'S MOTION TO SEAL

LIST OF EXHIBITS

Exhibit Number	Description
EX2001	UATP information (https://www.urbanair.com/attractions/indoor-slide-park/)
EX2002	Murakami website (https://murakamiscreen.com/murakami-product/mesh-adhesives/)
EX2003	Fiber-on-fiber friction measurement using hanging fiber, Azam Alirezazadeh
EX2004	Mesh, Merriam-Webster.com (retrieved from https://merriam-webster.com/dictionary/mesh)
EX2005	Sheeting, Merriam-Webster.com (retrieved from https://merriam-webster.com/dictionary/sheeting)
EX2006	Mesh, The Fairchild Books Dictionary of Textiles
EX2007	Sheeting, The Fairchild Books Dictionary of Textiles
EX2008	Sailcloth, Merriam-Webster.com (retrieved from https://merriam-webster.com/dictionary/sailcloth)
EX2009	Canvas, The Fairchild Books Dictionary of Textiles
EX2010	Burlap, The Fairchild Books Dictionary of Textiles
EX2011	Sailcloth, The Fairchild Books Dictionary of Textiles
EX2012	Jute Burlap (retrieved from https://fabricwholesaledirect.com/products/standard-10-oz-jute-burlap-60-inch-fabric)
EX2013	ASTM G115 (retrieved from https://www.astm.org/standards/g115)
EX2014	https://koyo.jtekt.co.jp/en/support/bearing-knowledge/8-4000.html
EX2015	The coefficient of friction of cartilage (Forsey, 2006)
EX2016	ASTM D1894 (retrieved from https://www.astm.org/d1894-24.html)
EX2017	ASTM D883 (retrieved from https://www.astm.org/d0883-24b.html)
EX2018	ASTM F1918 (retrieved from https://www.astm.org/f1918-21.html)
EX2019	Lower weight sailcloths (retrieved from https://www.sailrite.com/shop/fabric/marine-fabric/sailcloth)
EX2020	The weights of the fabrics (retrieved from https://www.kayospruce.com/facts-measurements for the standard conversion of sailcloth weight from g/m ² to ounces)
EX2021	Nylon (retrieved from https://www.mcmaster.com/products/nylon-film/)

EX2022	Dacron (retrieved from https://foammart.com/product/dacron-roll/ and https://foamforyou.com/outdoor-dacron-foam?srsltid=AfmBOopu-5B9zLoVKgtjlSp9uUPDfGx7ckTQs_Khck86n0hnBeGTmUuH)
EX2023	Molybdenum disulfide, Vazirisereshk, M.R. et a, “Solid lubrication with MoS ₂ : A Review, Lubricants
EX2024	Diamond-like carbon, Berman, D., “Graphene: a new emerging lubricant,” Materials Today
EX2025	Static friction coefficient of some plastics against steel and aluminum under different contact conditions, Benabdallah, Science Direct
EX2026	Expert Declaration of Dr. Stephen Spiegelberg
EX2027	Expert Declaration of Dr. Jon Rust
EX2028	Email authorizing patent owner's motion to submit supplemental information
EX2029	Deposition Transcript of Dr. Youjiang Wang, dated August 20, 2025
EX2030	Supplemental Expert Declaration of Dr. Stephen Spiegelberg
EX2031	Supplemental Expert Declaration of Dr. Jon Rust
EX2032	A Complete Guide to Mesh/Netting Fabric (retrieved from https://www.apexmills.com/media_post/a-complete-guide-to-mesh-netting-fabric/)
EX2033	Declaration of Mr. Gary Schmit
EX2034	Z. Chen, R. Feng & H. Wang, <i>Modeling Friction and Air Effects between Cloth and Deformable Bodies</i> (2013) (retrieved from http://www.zhilichen.com/research/air_friction/2013-MFA.pdf).
EX2035	K.A. Beyene & V.R. Sampath, <i>Modeling Surface Roughness for Prediction and Evaluation of Bed-Sheet Woven Fabric</i> , Int’l Conf. Proc. CTA 2019, Ethiopia.
EX2036	S. Islam, S. Chowdhury & S. Akter, <i>The Experiential Analysis of Woven Fabric for Reproduction</i> , 4 J. Textile Sci. & Tech. 18 (2018).
EX2037	R.K. Upadhyay & A. Kumar, <i>A Novel Approach to Minimize Dry Sliding Friction and Wear Behavior of Epoxy by Infusing Fullerene C70 and Multiwalled Carbon Nanotubes</i> , 120 Tribology Int’l 455 (2018).
EX2038	J. Tian, X. Qi, C. Li & G. Xian, <i>Friction Behaviors and Wear Mechanisms of Multi-Filler Reinforced Epoxy Composites Under Dry and Wet Conditions: Effects of Loads, Sliding Speeds, Temperatures, Water Lubrication</i> , 179 Tribology Int’l 108148 (2023).
EX2039	Slick Slide Coefficient of Friction Test Data
EX2040	Slick Slide Ride Vehicle Mesh Layer Open Area Data

EX2041	Slick Slide Ride Vehicle Mesh Layer Warp and Weft Data
EX2042	Indoor Action Park Coming to Polaris (retrieved from https://columbusunderground.com/indoor-action-park-coming-to-polaris-ak1/)
EX2043	Slick Slide Webpage (retrieved from https://slickslide.com/indoor-slides/)
EX2044	Slick City Action Park About Us Webpage (retrieved from https://slickcity.com/about/)
EX2045	Industry Praise
EX2046	Coextensiveness Claim Chart
EX2047	Patent Owner's Demonstratives
EX2048	Stephen Polozola LinkedIn page (retrieved from https://www.linkedin.com/in/spolozola/)
EX2049	Unleashed Brands Organizational Chart (retrieved from https://theorg.com/org/unleashed-brands/org-chart/stephen-polozola)
EX2050	Unleashed Brands LinkedIn page (retrieved from https://www.linkedin.com/company/unleashed-brands/people/?keywords=counsel)
EX2051	Unleashed Brands Leadership Changes (retrieved from https://www.franchising.com/news/20250108_unleashed_brands_announces_key_executive_leadership_changes.html)
EX2052	Farheen Ibrahim Texas Attorney (retrieved from https://mytexasdefenselawyer.com/attorney-profiles/Farheen-ibrahim-24081988)
EX2053	Franchise Tax Account Statuses (retrieved from https://comptroller.texas.gov/taxes/franchise/account-status/search/32093646613 ; https://comptroller.texas.gov/taxes/franchise/account-status/search/32051163296 ; and https://comptroller.texas.gov/taxes/franchise/account-status/search/32052366435)
EX2054	Declaration of Stephen Polozola in Texas Litigation (<i>UATP Management, LLC v. Hall et al.</i> , 4:26-cv-01069, Dkt. 1, Attachment 1 (Affidavit of Stephen Polozola))
EX2055	Deposition Transcript of Stephen Polozola, dated March 25, 2026
EX2056	UATP Management, LLC, Franchise Disclosure Document
EX2057	Fort Worth Urban Air Waiver, Release, and Indemnification Agreement

EX2058	Declaration of Bron Launsby
EX2059	Images of Slides at Fort Worth Urban Air location
EX2060	Images of Slides at Southlake Urban Air location

I. INTRODUCTION

Patent Owner Slick Slide LLC (“Slick Slide”) respectfully requests portions of Patent Owner’s Motion to Terminate Proceeding as Time-Barred and for Failure to Identify All Real Parties in Interest and Exhibits 2055, 2056, and 2058 to be sealed under 37 C.F.R. § 42.54. Good cause exists to seal these documents because the documents contain information that Petitioner has indicated to be 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

Slick Slide respectfully moves to seal information designated as confidential by Petitioner, including non-public business and financial information of Petitioner. The information appears in Exhibits 2055, 2056, and 2058, and is discussed in Patent Owner's Motion to Terminate.

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 Patent Owner seeks to seal relates to information that, according to Petitioner, relates to non-public commercial information of Petitioner including confidential business and financial information.

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, Slick Slide respectfully requests that the Board grant Patent Owner's Motion to Seal. Slick Slide 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,

Dated: April 2, 2026

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CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6(e)(4), the undersigned certifies that on April 2, 2026, a complete and entire copy of this Patent Owner's Motion to Seal was provided via email, to the Petitioner by serving the email correspondence addresses of record as follows:

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