

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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VIANCE, LLC,  
Petitioner,

v.

KOPPERS PERFORMANCE CHEMICALS, INC.,  
Patent Owner.

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PGR2026-00023  
U.S. Patent No. 12,370,716

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**PATENT OWNER'S RESPONSE TO PETITIONER'S  
MOTION TO SEAL AND SUBMISSION OF ACKNOWLEDGMENT  
FOR ACCESS TO PROTECTIVE ORDER MATERIAL**

Pursuant to 37 C.F.R. § 42.55, Patent Owner, Koppers Performance Chemicals, Inc. (“Patent Owner”) does not oppose Petitioner’s motion to seal and for entry of the modified protective order attached thereto (Paper 1). *See* Ex. 1025 (proposed modified protective order). Attached herewith as Exhibit A are acknowledgments for access to the protective order material signed by Patent Owner’s counsel agreeing to the terms of the protective order requested by Petitioner.

Accordingly, Patent Owner requests that it be granted access to Petitioner’s Exhibits 1011-1012, 1018, 1027, 1031-1039, 1045-1062, 1065-1066, 1070-1074, 1076-1077, 1079, and 1081-1087 for which Petitioner has moved to seal. *See* 37 C.F.R. § 42.55(b)(1) (patent owner may “access the sealed confidential information prior to the institution of the trial by ... agreeing to the terms of the protective order requested by the petitioner”); Consolidated Trial Practice Guide at 21 (“The Board anticipates that a patent owner may use the Board’s electronic filing system to agree to the protective order requested by the petitioner and would, upon confirmation of the agreement by the Board, be given access to the provisionally sealed information.”).

Dated: April 1, 2026

Respectfully submitted,

/Jonathan Detrixhe/

Jonathan I. Detrixhe (Reg. No. 68,556)

Reed Smith LLP

101 Second Street, Suite 1800

San Francisco, CA 94105

Tel: (415) 543-8700

Fax: (415) 391-8269

jdetrrixhe@reedsmith.com

*Counsel for Patent Owner*

### **CERTIFICATE OF SERVICE**

Pursuant to 37 C.F.R. § 42.6(e), I certify that on April 1, 2026, a true and correct copy of the foregoing Patent Owner's Response to Petitioner's Motion to Seal and Submission of Acknowledgment for Access to Protective Order Material was served by electronic mail on Petitioner's lead and backup counsel at the following email addresses: PGR2026-00023@mcandrews-ip.com.

Date: April 1, 2026

/Jonathan Detrixhe/  
Jonathan Detrixhe, Reg. No. 68,556

## **EXHIBIT A**

VIANCE, LLC,  
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**Standard Acknowledgment for Access to Protective Order Material**

I, Robert Riddle, affirm that I have read the Protective Order; that I will abide by its terms; that I will use the confidential information only in connection with this proceeding and for no other purpose; that I will only allow access to support staff who are reasonably necessary to assist me in this proceeding; that prior to any disclosure to such support staff I informed or will inform them of the requirements of the Protective Order; that I am personally responsible for the requirements of the terms of the Protective Order and I agree to submit to the jurisdiction of the Office and the United States District Court for the Eastern District of Virginia for purposes of enforcing the terms of the Protective Order and providing remedies for its breach.

Executed on April 1, 2026  
/Robert Riddle/

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**Standard Acknowledgment for Access to Protective Order Material**

I, Jonathan Detrixhe, affirm that I have read the Protective Order; that I will abide by its terms; that I will use the confidential information only in connection with this proceeding and for no other purpose; that I will only allow access to support staff who are reasonably necessary to assist me in this proceeding; that prior to any disclosure to such support staff I informed or will inform them of the requirements of the Protective Order; that I am personally responsible for the requirements of the terms of the Protective Order and I agree to submit to the jurisdiction of the Office and the United States District Court for the Eastern District of Virginia for purposes of enforcing the terms of the Protective Order and providing remedies for its breach.

Executed on April 1, 2026  
/Jonathan Detrixhe/