

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

APPLE INC.,
Petitioner,

v.

KOSS CORPORATION,
Patent Owner.

Case IPR2021-00600
Patent 10,298,451

PETITIONER'S UNOPPOSED MOTION TO SEAL

Pursuant to 37 C.F.R. §§ 42.14 and 42.54, Petitioner Apple Inc. respectfully requests the Board to authorize the filing under seal of certain filings in this case, including the Joint Agreement Regarding Additional Discovery filed concurrently herewith. The parties have met and conferred on this Motion, and Patent Owner does not oppose.

Petitioner requests that the default Protective Order govern the materials in this proceeding. Pursuant to the Trial Practice Guide, 77 Fed. Reg. 48,756, 48,770, a copy of the acknowledgement page of the default Protective Order signed by Lead Counsel of Petitioner is attached hereto as Attachment A.

Good cause exists to seal the Joint Agreement Regarding Additional Discovery. Public disclosure of the Joint Agreement Regarding Additional Discovery has the potential to significantly harm Petitioners' competitive position because it would allow competitors to access highly sensitive information regarding litigation strategy and Petitioners' financial data. For these reasons, Petitioner has designated the Confidential Materials as "Protective Order Material" under the default Protective Order.

Undersigned counsel, on behalf of Petitioner, certifies that the information sought to be sealed has not, to their knowledge, been published or otherwise made public by Petitioner.

Respectfully submitted,

Date: December 15, 2021

/W. Karl Renner/

W. Karl Renner, Reg. No. 41,265
Roberto Devoto, Reg. No. 55,108
Ryan Chowdhury, Reg. No. 74,466
Fish & Richardson P.C.
3200 RBC Plaza, 60 South Sixth Street
Minneapolis, MN 55402
T: 202-783-5070
F: 877-769-7945

CERTIFICATE OF SERVICE

Pursuant to 37 CFR § 42.6(e), the undersigned certifies that on December 15, 2021, a complete and entire copy of this Petitioner's Unopposed Motion to Seal were provided via email, to the Patent Owner by serving the correspondence addresses of record as follows:

Mark G. Knedeisen
Laurén Murray
Brian P. Bozzo

K&L GATES LLP
K&L Gates Center, 210 Sixth Avenue
Pittsburgh, PA 15222

Email: mark.knadeisen@klgates.com

Email: lauren.murray@klgates.com

Email: brian.bozzo@klgates.com

/Crena Pacheco/

Crena Pacheco
Fish & Richardson P.C.
60 South Sixth Street, Suite 3200
Minneapolis, MN 55402
(617) 956-5938

Attachment A

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