| UNITED STATES PATENT AND TRADEMARK OFFIC |
|--|
| BEFORE THE PATENT TRIAL AND APPEAL BOARD |
| TENNANT COMPANY, |
| Petitioner, v. |
| OXYGENATOR WATER TECHNOLOGIES, INC., |
| Patent Owner. |
| Case IPR2021-00625 |
| Patent RE45415 |

PATENT OWNER OXYGENATOR WATER TECHNOLOGIES, INC.'S **MOTION TO SEAL**



Oxygenator Water Technologies, Inc. ("Patent Owner") respectfully moves to file under seal Exhibits 2116 (which is an unredacted version of Exhibit 2117), 2129, 2151-2156, 2176, 2177, 2179, 2182-2185 as well as an unredacted version of its Patent Owner Response, filed herewith. Specifically, these exhibits and Patent Owner's Response include information Petitioner designated as confidential or filed under seal in the co-pending district court action. Pursuant to the amended protective order in that matter, Patent Owner was therefore required to move to seal these documents. Dkt. 435 at 3.

Dated: November 19, 2021 Respectfully submitted,

/J. Derek Vandenburgh/

J. Derek Vandenburgh Registration No. 32,179 Carlson, Caspers, Vandenburgh & Lindquist, P.A. 225 South Sixth Street, Suite 4200 Minneapolis, MN 55402 Email: DVandenburgh@carlsoncaspers.com

Lead Counsel for Patent Owner
Oxygenator Water Technologies, Inc



1

CERTIFICATION OF SERVICE

Pursuant to 37 C.F.R. § 42.6(e) and the agreement of the parties, the undersigned certifies that on November 19, 2021, a true and correct copy of the foregoing was served via electronic mail upon the following:

R. Scott Johnson (Reg. No. 45,792) Fredrikson & Byron, P.A. 505 E. Grand Ave., Suite 200 Des Moines, IA 50309

Phone: (515) 242-8930 Fax: (515) 242-8950

Email: RSJohnson@fredlaw.com

Adam R. Steinert Fredrikson & Byron, P.A. 200 South 6th Street, Suite 4000 Minneapolis, MN 55402

Tel: (612) 492-7000 Fax: (612) 492-7797

Email: asteinert@fredlaw.com

Thomas M. Patton (Reg. No. 76,193) Fredrikson & Byron, P.A. 505 E. Grand Ave., Suite 200 Des Moines, IA 50309

Phone: (515) 242-8908 Fax: (515) 242-8950

Email: tpatton@fredlaw.com

/s/ J. Derek Vandenburgh

J. Derek Vandenburgh (Lead Counsel)

