

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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MEDIATEK INC.,

Petitioner

v.

PARKERVISION, INC.,

Patent Owner.

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Case No: IPR2024-00150

U.S. Patent No. 7,292,835

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**PETITIONER'S MOTION TO FILE  
CONFIDENTIAL DOCUMENTS UNDER SEAL  
PURSUANT TO 37 C.F.R. §§ 42.14 AND 42.54**

Pursuant to 37 C.F.R. §§ 42.14 and 42.54, Petitioner MediaTek Inc. (“MediaTek”) respectfully submits this Motion to Seal Exhibit 1015 filed concurrently with this Motion and the Petition for Inter Partes Review. MediaTek understands that Patent Owner considers Exhibit 1015 highly confidential and therefore no public redacted version of this document is being filed.

Pursuant to the Consolidated Trial Practice Guide (Nov. 2019), “[t]he terms of a protective order take effect upon the filing of a Motion to Seal by a party, and remain in place until lifted or modified by the Board either on the motion of a party for good cause shown or sua sponte by the Board.” (Appendix B, § (b).) Accordingly, MediaTek understands that the protective order (Ex. 1022) proposed by MediaTek, and identical to the default protective order from Appendix B of Consolidated Trial Practice Guide (Nov. 2019), will take effect upon filing of this motion.

## **I. Background**

MediaTek is concurrently submitting with its Petition for Inter Partes Review an Exhibit 1015. As explained below, this document belongs to Patent Owner, and Patent Owner apparently considers this document to be highly confidential.

## **II. Good Cause Regarding Sealing the Exhibit Containing Confidential Information**

Exhibit 1015 was served by Patent Owner on MediaTek in the parallel district court litigation. Patent Owner marked the document “Confidential” on all pages. Exhibit 1015 is an alleged infringement claim chart that constitutes part of Patent Owner’s preliminary infringement contentions in the parallel district court litigation. MediaTek understands, based on activities in a separate district court litigation against a third party, that Patent Owner considers the reverse engineering analysis in documents like Exhibit 1015 to be highly confidential and not appropriate for public disclosure. *See* Discovery Order, *ParkerVision, Inc. v. Realtek Semiconductor Corp.*, No. 6:22-cv-01162 (W.D. Tex. July 27, 2023) (ECF 63).

Thus, Exhibit 1015 belongs to Patent Owner, and Patent Owner apparently considers it to contain highly confidential information not appropriate for public disclosure. On that basis, MediaTek moves to seal Exhibit 1015.

Dated: November 15, 2023

Respectfully submitted,

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Attorneys for MediaTek Inc., Petitioner

**CERTIFICATE OF SERVICE**

I hereby certify that on November 15, 2023, a true and correct copy of the foregoing MOTION TO SEAL EXHIBIT by electronic mail on the Patent Owner via its attorneys of record:

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and the attorneys of record for Plaintiff in the concurrent litigation matter:

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