

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

INTERNATIONAL BUSINESS MACHINES CORPORATION

Petitioner

v.

SECURITY FIRST INNOVATIONS, LLC

Patent Owner

Case No. IPR2025-01200

U.S. Patent No. 8,271,802

PETITIONER'S UNOPPOSED MOTION TO SEAL PETITIONER'S
SUR-REPLY IN OPPOSITION TO PATENT OWNER'S
REQUEST FOR DISCRETIONARY DENIAL

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PETITIONER’S TABLE OF EXHIBITS

Exhibit No.	Description
1001	U.S. Patent No. 8,271,802 (’802 Patent)
1002	Declaration of Dr. Erez Zadok
1003	U.S. Patent Publication No. 2003/0065656 (“Torre”)
1004	U.S. Patent Publication No. 2003/0028493 (“Tajima”)
1005	U.S. Patent Publication No. 2004/0030921 (“Aldridge”)
1006	“Secret Sharing Made Short,” Hugo Krawczyk, Advances in Cryptology - CRYPTO ’93, 13th Annual International Cryptology Conference, LNCS 773, 136-146, 1993 (“Krawczyk”)
1007	U.S. Patent Publication No. 2003/0200176 (“Foster”)
1008	U.S. Patent Publication No. 2004/0049687 (“Orsini”)
1009	File History of U.S. Patent No. 8,271,802
1010	File History of U.S. Patent Application No. 11/258,839
1011	File History of U.S. Patent Application No. 13/371,363
1012	Comparison Of The ’802 Patent’s Specification And Orsini
1013	<i>Google, LLC v. Sec. First Innovations, LLC</i> , IPR2024-00212, Exhibit 1043 (Patent Owner’s Proposed Claim Constructions In <i>Sec. First Innovations, LLC v. Google, LLC</i> , No. 2:23-cv-00097 (E.D. Va.)) (“PO’s Google Litigation Construction”)
1014	U.S. Provisional Application No. 60/622,146
1015	U.S. Provisional Application No. 60/718,185
1016	Microsoft Computer Dictionary, 5 th ed., 2002, excerpts (“Microsoft Computer Dictionary”)
1017	Bruce Schneier, Applied Cryptography, 2 nd ed., 1996, excerpts (“Schneier”)
1018	Curriculum Vitae of Dr. Erez Zadok
1019	Yitzhak Birk, “Random RAIDs with Selective Exploitation of Redundancy for High Performance Video Servers,” IEEE 1997 (“Birk”)
1020	U.S. Patent Publication No. 2003/0016596A1 (“Chiquoine”)
1021	Declaration of Dr. Hall-Ellis (“Hall-Ellis Decl.”)
1022	John Kubiawicz, et al., “OceanStore: An Architecture for Global-Scale Persistent Storage,” ACM 2000 (“Kubiawicz”)
1023	U.S. Patent No. 6,226,618 (“Downs”)

Exhibit No.	Description
1024	P. Venkat Rangan et al., “Designing File Systems for Digital Video and Audio,” ACM SIGOPS Operating Systems Review, Volume 25, Issue 5, 81–94 (1991) (“Rangan”)
1025	<i>Sotera</i> Stipulation
1026	Cisco and IBM Joint Press Release, “Cisco and IBM Work Together to Accelerate the ASP Ecosystem” (Oct. 18, 1999)
1027	TechMonitor Article, “IBM Announces Software Consulting Initiative for ASPs” (Oct. 26, 1999)
1028	Press Release, <i>Emerging ASP Market Standardizing on Citrix Platform</i> (epixtech, inc., Jan. 19, 2000)
1029	Spencer E. Ante, “IBM Sells the Next Big Thing in E-Business,” <i>BusinessWeek</i> (Nov. 5, 2002)
1030	“Study: IBM and EDS Lead Web Hosting Market,” <i>Computerworld</i> (May 30, 2003)
1031	2014 Statement of Work (PROTECTIVE ORDER MATERIAL)
1032	2017 Statement of Work (PROTECTIVE ORDER MATERIAL)
1033	U.S. Patent No. 9,338,140 (“the ’140 Patent”)
1034	U.S. Patent No. 10,452,854 (“the ’854 Patent”)
1035	U.S. Patent No. 11,068,609 (“the ’609 Patent”)
1036	U.S. Patent No. 11,178,116 (“the ’116 Patent”)
1037	Declaration of Pankaj Parekh in Support of Approval of Disclosure Statement and Confirmation of Plan of Reorganization, <i>In re Sec. First Corp.</i> , No. 20-12053 (BLS) (Bankr. D. Del. Oct. 13, 2020)
1038	Docket Navigator Report – List of Cases Involving the ’802 Patent
1039	USPTO Order Granting Ex Parte Reexamination of U.S. Patent No. 9,338,140 (Control No. 90/019,836)
1040	<i>Google LLC v. Sec. First Innovations, LLC</i> , IPR2024-00215, Paper 43 (PTAB May 16, 2025) (Final Written Decision)
1041	<i>Google LLC v. Sec. First Innovations, LLC</i> , IPR2024-00214, Paper 44 (PTAB May 16, 2025) (Final Written Decision)
1042	<i>Google LLC v. Sec. First Innovations, LLC</i> , IPR2024-00212, Paper 42 (PTAB May 16, 2025) (Final Written Decision)
1043	<i>Sec. First Innovations, LLC v. Google LLC</i> , No. 2:23-cv-97 (E.D. Va.), Dkt. 254-1
1044	<i>Sec. First Innovations, LLC v. IBM</i> , No. 1:25-cv-00514-CMH-WEF (E.D. Va.), Dkt. 88 (Aug. 20, 2025).
1045	Declaration of Mr. Michael Loria (“Loria Decl.”)

Exhibit No.	Description
1046	<i>Sec. First Innovations, LLC v. Google LLC</i> , No. 2:23-cv-97 (E.D. Va.), Dkt. 1.

I. INTRODUCTION

Pursuant to 37 C.F.R. §§ 42.14 and 42.54, Petitioner International Business Machines Corporation (“IBM”) hereby respectfully moves to seal Petitioner’s Sur-reply in Opposition to Patent Owner’s Request for Discretionary Denial (“Sur-reply”) filed concurrently herewith, designated as PROTECTIVE ORDER MATERIAL pursuant to the Default Protective Order¹. Patent Owner does not oppose.

II. MOTION TO SEAL

A. DOCUMENTS TO BE SEALED

1. Petitioner’s Sur-reply

IBM’s Sur-reply refers to and quotes confidential information in Exhibit 2021 designated PROTECTIVE ORDER MATERIAL by SFI and is currently subject to a motion to seal (*see* Paper 12). IBM submits a public, redacted version of the Sur-reply that redacts only those passages that would disclose confidential terms from Exhibit 2021.

¹ Patent Owner filed an unopposed motion for entry of the Default Protective Order on October 6, 2025, which is pending. *See* Paper 13.

B. GOOD CAUSE EXISTS FOR SEALING IDENTIFIED DOCUMENTS

IBM's Sur-reply quotes and characterizes information in Exhibit 2021 that Patent Owner, SFI, has designated PROTECTIVE ORDER MATERIAL and has moved to seal. *See* Paper 12. According to SFI, there is good cause to seal Exhibit 2021. Paper 12 at 2-3. For those same reasons, IBM seeks to seal the portions of IBM's Sur-reply that quote and/or characterize Exhibit 2021. IBM is filing a public redacted version of the Sur-reply that redacts the portions that quote and/or characterize information in Exhibit 2021.

C. NON-CONFIDENTIAL VERSIONS OF CONFIDENTIAL DOCUMENTS

Pursuant to Section 5(A)(ii) of the Default Protective Order, IBM hereby files a public redacted version of the Petitioner's Sur-reply that redact any PROTECTIVE ORDER MATERIAL.

D. CERTIFICATION OF NON-PUBLICATION

The undersigned counsel certifies that information sought to be sealed by this Motion have not, to their knowledge, been published or otherwise made public. Also, pursuant to 37 C.F.R. § 42.54, IBM has in good faith conferred with other affected parties in an effort to resolve any dispute on the motion to seal.

III. CONCLUSION

For the reasons discussed above, IBM respectfully requests that the Board grant its motion to seal Petitioner's Sur-reply.

Dated: October 30, 2025

Respectfully submitted,

/Taeg Sang Cho/

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CERTIFICATE OF SERVICE

The undersigned certifies that on October 30, 2025, complete copies of the foregoing was served on counsel of record for the Patent Owner by filing the documents through P-TACTS and by sending via electronic mail to the following addresses:

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