

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

TAIWAN SEMICONDUCTOR MANUFACTURING CO. LTD.,

Petitioner

v.

ADVANCED INTEGRATED CIRCUIT PROCESS LLC,

Patent Owner

Case IPR2025-01211
Patent 7,439,623

UNOPPOSED MOTION TO SEAL

Pursuant to 37 C.F.R. §§ 42.14 and 42.54, the Trial Practice Guide, and the proposed procedures in Paper 11 (Unopposed Motion for Protective Order), Attachment A, ¶6(a), Patent Owner Advanced Integrated Circuit Process LLC (“AICP”) respectfully submits this Motion to Seal the unredacted version of AICP’s reply brief in support discretionary denial. AICP is filing, concurrently with this Motion to Seal, a public redacted version of the reply brief.

The Trial Practice Guide provides that “the rules aim to strike a balance between the public’s interest in maintaining a complete and understandable file history and the parties’ interest in protecting truly sensitive information.” Patent Trial and Appeal Board Consolidated Trial Practice Guide at 19 (Nov. 2019).¹ Further, those rules “identify confidential information in a manner consistent with Federal Rules of Civil Procedure 26(c)(1)(G), which provides for protective orders for trade secret or other confidential research, development, or commercial information.” *Id.* (citing 37 C.F.R. § 42.54).

The unredacted version of AICP’s reply brief discloses the existence of and licensees of licenses granted to the patent at issue in this proceeding, as reflected in a Patent Purchase Agreement (“PPA”) between AICP and its predecessor-in-interest

¹ *Available at*

<https://www.uspto.gov/sites/default/files/documents/tpgnov.pdf?MURL=TrialsPracticeGuideConsolidated>.

in and to the patent, Nuvoton Technology Corporation Japan. The identities of such licensees and the terms of the PPA, which has been filed as EX2026 and is subject to a motion to seal, are confidential to AICP and third-party Nuvoton Technology Corporation Japan. The PPA has been designated “Attorneys Eyes Only – Highly Confidential” under the Protective Order in related co-pending litigation (*see* EX2009).

The unredacted reply brief should be maintained under seal pursuant to the proposed Protective Order to maintain consistency between co-pending proceedings and preserve the same protections for the same information in both forums. In addition, the terms of the PPA filed as Exhibit 2026 are commercially sensitive information to both AICP and third-party Nuvoton Technology Corporation Japan. The Board should protect the confidentiality interests of all litigants, but it should give particular deference to the interests of non-parties. Accordingly, good cause exists for sealing the unredacted reply brief.

Counsel for AICP informed Counsel for Petitioner of its intent to file this Motion, and Petitioner does not oppose the relief requested.

Dated: November 5, 2025

Respectfully submitted,

By: /Russell A. Chorush /
Russell A. Chorush (Reg. No. 55,869)
Attorney for Patent Owner
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CERTIFICATE OF SERVICE

The undersigned certifies that pursuant to 37 C.F.R. § 42.6(e), copies of the foregoing **MOTION TO SEAL** and **PATENT OWNER’S REPLY BRIEF IN SUPPORT OF DISCRETIONARY DENIAL** were served to the following counsel of record for Petitioner addressed as follows:

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