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March 29, 2024

FILED VIA EDIS

The Honorable Lisa R. Barton
Secretary
U.S. International Trade Commission
500 E Street, SW, Room 112A
Washington, DC 20436

Re: *Certain Cameras, Camera Systems, and Accessories Used Therewith*

Dear Secretary Barton:

Enclosed for filing, please find documents in support of a request by GoPro, Inc. (“Complainant”) that the U.S. International Trade Commission institute an investigation pursuant to Section 337 of the Tariff Act of 1930, as amended, concerning certain cameras, camera systems, and accessories used therewith.

There is no confidential business information contained in the complaint itself, but we have included a separate letter requesting confidential treatment for six (6) exhibits included with this filing.

On March 16, 2020, the Commission provided “notice that it is temporarily waiving and amending certain of the Commission’s rules that required the filing of paper copies, CD-ROMS, and other physical media in section 337 investigations to address concerns about COVID-19.” International Trade Commission, Temporary Changes to Filing Procedures, Federal Register Vol. 85, No. 54 (March 19, 2020). Specifically, the Commission approved the temporary amendment of various rules “to permit parties to file section 337 complaints, exhibits, attachments, and appendices, electronically.” *Id.* Accordingly, Complainant’s filing only contains electronic documents.

Complainant’s submission via EDIS includes the following:

1. One (1) electronic copy of Complainant's Verified Complaint, pursuant to Commission Rule 210.8(a)(1)(i).
2. One (1) electronic copy of the public exhibits to the Verified Complaint pursuant to Commission Rules 210.8(a)(1)(1) and 210.12(a)(9), including:
 - a. one (1) electronic certified copy of each of United States Patent Nos. 10,015,413 ("the '413 patent"), 10,529,052 ("the '052 patent"), 10,574,894 ("the '894 patent"), 10,958,840 ("the '840 patent"), 11,336,832 ("the '832 patent"), and D789,435 ("the D'435 patent"), copies of which are respectively included as Exhibits 1, 3, 5, 7, 9, and 11 to the Verified Complaint pursuant to Commission Rule 210.12(a)(9)(1); and
 - b. one (1) electronic copy of the certified assignment records for each of the '413, '052, '894, '840, '832, and D'435 patents, copies of which are respectively included as Exhibits 2, 4, 6, 8, 10, and 12 to the Verified Complaint, pursuant to Commission Rule 210.12(a)(9)(ii).
3. One (1) electronic copy of the confidential exhibits to the Verified Complaint, pursuant to Commission Rules 201.6(c) and 210.8(a)(1)(ii).
4. One (1) electronic copy of the certified prosecution history for each of the '413, '052, '894, '840, '832, and D'435 patents, which are respectively identified as Appendices A, C, E, G, I, and K to the Verified Complaint, pursuant to Commission Rule 210.12(c)(1).
5. One (1) electronic copy of each patent and applicable pages of each technical reference mentioned in the respective prosecution histories of the '413, '052, '894, '840, '832, and D'435 patents, which are respectively identified as Appendices B, D, F, H, J, and L to the Verified Complaint, pursuant to Commission Rule 210.12(c)(2).
6. A letter and certification requesting confidential treatment for the information contained in confidential exhibits 30-34 and 36 to the Verified Complaint, pursuant to Commission Rules 201.6(b) and 210.5(d).
7. A Statement on the Public Interest regarding the remedial orders sought by Complainant in the Verified Complaint, pursuant to Commission Rule 210.8(b).

Complainant confirms that it will serve copies of the non-confidential versions of the Complaint and all associated exhibits and appendices upon the institution of this investigation on the proposed Respondents and all other appropriate entities consistent with 19 C.F.R. part 201 (including 19 C.F.R. § 201.16) and the Temporary Procedures.

Please contact me with any questions regarding this filing.

Respectfully submitted,

/s/ S. Alex Lasher

S. Alex Lasher

Counsel for Complainant GoPro, Inc.

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REQUEST FOR CONFIDENTIAL TREATMENT

March 29, 2024

FILED VIA EDIS

The Honorable Lisa R. Barton
Secretary
U.S. International Trade Commission
500 E Street, SW, Room 112A
Washington, DC 20436

Re: *Certain Cameras, Camera Systems, and Accessories Used Therewith*

Dear Secretary Barton:

Pursuant to Commission Rule 201.6, Complainant GoPro, Inc. respectfully requests confidential treatment of certain confidential business information contained in confidential exhibits 30-34 and 36 to the Verified Complaint.

The information in the exhibits for which Complainant seeks confidential treatment consists of proprietary commercial information, including confidential and proprietary technical information related to domestic articles protected by Complainant's asserted patents, and financial data regarding Complainant's domestic investments in plant, equipment, labor, and capital related to domestic articles protected by Complainant's asserted patents.

The proprietary information described herein qualifies as confidential business information under Commission Rule 201.6 because substantially identical information is not available to the public, because the disclosure of this information would cause substantial competitive harm to Complainant, and because the disclosure of this information would likely impede the Commission's efforts and ability to obtain similar information in the future.

Thank you for your attention. Please contact me with any questions regarding this request for confidential treatment.

Respectfully submitted,

/s/ S. Alex Lasher

S. Alex Lasher

Counsel for Complainant GoPro, Inc.