

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

Ramot at Tel Aviv University Ltd. v. Cisco Systems, Inc. and Acacia Communications, Inc.

Ramot · No. C.A. No. 22-674-GBW (consolidated) · Decided December 22, 2025

SUMMARY

The United States District Court for the District of Delaware denied without prejudice Defendants’ unopposed motion to redact portions of the Court’s November 18, 2025 Memorandum Opinion in a patent infringement dispute. The Court held that Defendants had not articulated sufficiently specific harm to overcome the common-law and First Amendment rights of access to judicial records and summary judgment materials. The Court permitted Defendants to renew their motion by January 30, 2026 and ordered that the Memorandum Opinion remain under seal pending further action.

CASE DETAILS

COURT	United States District Court for the District of Delaware
WRITING FOR THE COURT	Gregory B. Williams
JURISDICTION	United States District Court for the District of Delaware
DECIDED	December 22, 2025
DOCKET	C.A. No. 22-674-GBW (consolidated)
DISPOSITION	other
PROCEDURAL POSTURE	Defendants moved unopposed to redact portions of the Court's November 18, 2025 memorandum opinion. The district court denied the motion without prejudice and ordered that the underlying memorandum opinion remain under seal pending a possible renewed motion.
STANDARD OF REVIEW	A motion to redact a judicial opinion is evaluated under the applicable protective-order, common-law right-of-access, and First Amendment right-of-access standards. Under the common-law and First Amendment standards, the party seeking closure or redaction must identify a clearly defined and serious injury with specificity; the First Amendment standard requires a higher showing than the common-law standard.
PRECEDENTIAL VALUE	unknown

PARTIES

Cisco Systems, Inc., Acacia Communications, Inc. v. Ramot at Tel Aviv University Ltd.

TOPICS

civil procedure

summary judgment

first amendment

commercial litigation

constitutional law

PRACTICE AREAS

civil procedure

intellectual property

commercial litigation

constitutional law

QUESTIONS PRESENTED

1. Whether portions of the Court's November 18, 2025 memorandum opinion could be redacted under the common-law right of public access to judicial records.
2. Whether summary-judgment records implicate the First Amendment right of public access in the Third Circuit.
3. Whether Defendants identified a sufficiently specific and serious injury to overcome the common-law and First Amendment presumptions of access.

HOLDINGS

1. The memorandum opinion is a judicial record subject to the common-law right of public access, and Defendants failed to rebut the resulting strong presumption of access.
2. Summary-judgment records implicate the First Amendment right of public access.
3. Defendants failed to overcome the First Amendment presumption of access because they did not show with sufficient specificity that disclosure would cause a clearly defined and serious injury.

KEY QUOTATIONS

“A competitor gaining nonpublic knowledge, without more, is not a “clearly defined and serious injury” sufficient to overcome the presumption afforded by the common law right of access.” (Section III.A)

“Defendants’ Motion (D.I. 317) is DENIED without prejudice;” (Conclusion)

FACTUAL BACKGROUND

Defendants asserted that the proposed redactions concerned confidential technical information about the inner workings of their products. They claimed disclosure could enable competitors to gain knowledge about how Cisco's products are designed and operate at a level not publicly known. The Court found that Defendants did not assert trade-secret status or articulate specific harm beyond the possibility of competitive advantage from disclosure.

PROCEDURAL HISTORY

Cisco and Acacia originally brought a declaratory-judgment action concerning Ramot's '872 patent. Ramot later asserted infringement counterclaims and, after issuance of the '998 patent, the parties litigated a second declaratory-judgment action concerning that patent. The actions were consolidated, and the Court granted Defendants' motion for summary judgment of no infringement in a November 18, 2025 memorandum opinion. Defendants then moved to redact portions of that opinion based on alleged confidential technical business information.

DISPOSITION

other

CASES CITED

- In re Avandia Mktg., Sales Pracs. & Prods. Liab. Litig., 924 F.3d 662 (3d Cir. 2019)
- Publicker Indus., Inc. v. Cohen, 733 F.2d 1059 (3d Cir. 1984)
- Pansy v. Borough of Stroudsburg, 23 F.3d 772 (3d Cir. 1994)
- Glenmede Tr. Co. v. Thompson, 56 F.3d 476 (3d Cir. 1995)
- Goldstein v. Forbes (In re Cendant Corp.), 260 F.3d 183 (3d Cir. 2001)
- Republic of the Philippines v. Westinghouse Elec. Corp., 949 F.2d 653 (3d Cir. 1991)
- Lipocine Inc. v. Clarus Therapeutics, Inc., 2020 WL 4569473 (D. Del. Aug. 7, 2020)
- Littlejohn v. Bic Corp., 851 F.2d 673 (3d Cir. 1988)
- Miller v. Indiana Hosp., 16 F.3d 549 (3d Cir. 1994)
- N. Jersey Media Grp. Inc. v. United States, 836 F.3d 421 (3d Cir. 2016)
- Lugosch v. Pyramid Co. of Onondaga, 435 F.3d 110 (2d Cir. 2006)
- Rushford v. New Yorker Mag., Inc., 846 F.2d 249 (4th Cir. 1988)
- Am. Bd. of Internal Med. v. Salas Rushford, 2025 WL 957698 (D.N.J. Mar. 31, 2025)