

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

ROKU, INC.,
Petitioner

v.

MEDIA CHAIN, LLC,
Patent Owner

Case IPR2022-00389
U.S. Patent No. 9,715,581

**PETITIONER'S UNOPPOSED REQUEST TO FILE SETTLEMENT
AGREEMENT AS BUSINESS CONFIDENTIAL INFORMATION
PURSUANT TO 35 U.S.C. § 317(b)**

Mail Stop "PATENT BOARD"
Patent Trial and Appeal Board
U.S. Patent and Trademark Office
P.O. Box 1450
Alexandria, VA 22313-1450

Pursuant to 35 U.S.C. § 317(b) and 37 C.F.R. § 42.74(c), Petitioner Roku, Inc. (“Petitioner”), hereby requests that a true copy of the confidential settlement agreement between Petitioner and Patent Owner Media Chain, LLC (“Patent Owner”), filed concurrently herewith as Exhibit 1100, be treated as business confidential information and be kept separate from the file of this *inter partes* review (IPR) proceeding. The Board authorized Petitioner to file this request in an email of May 16, 2022. Concurrently with the filing of this request, Petitioner is filing an Unopposed Motion to Dismiss this IPR pursuant to the confidential settlement agreement between the parties.

Petitioner considers the settlement agreement to contain highly sensitive business confidential information that would substantially harm its business interests if publicly disclosed. As such, Petitioner hereby requests that the settlement agreement be kept as a separate paper to be made available only under the provisions of 35 U.S.C § 317(b) and 37 C.F.R. § 42.74(c). The settlement agreement has been filed for access by the “Board and Parties Only.” Petitioner further requests that the Board order that in the event a person or entity makes a written request for access to the settlement agreement, as stated in 37 C.F.R. § 42.74(c)(1)-(2), any such written request be served upon Petitioner and Patent Owner on the day the written request is provided to the Board.

Respectfully submitted,

STERNE, KESSLER, GOLDSTEIN & FOX P.L.L.C.

/Lestin L. Kenton/

Lestin L. Kenton (Reg. No. 72,314)
Attorney for Petitioner Roku, Inc.

Date: June 1, 2022

1100 New York Avenue, N.W.
Washington, D.C. 20005-3934
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CERTIFICATION OF SERVICE

The undersigned hereby certifies that true and correct copies of the foregoing **PETITIONER'S UNOPPOSED REQUEST TO FILE SETTLEMENT AGREEMENT AS BUSINESS CONFIDENTIAL INFORMATION PURSUANT TO 35 U.S.C. § 317(b) and EXHIBIT 1100 (Confidential)** were electronically served in their entireties on June 1, 2022, on the following party via email:

Christopher A. Estes chris@mediachainllc.com

Respectfully submitted,

STERNE, KESSLER, GOLDSTEIN & FOX P.L.L.C.

/Lestin L. Kenton/

Lestin L. Kenton (Reg. No. 72,314)
Attorney for Petitioner Roku, Inc.

Date: June 1, 2022

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