

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

INTEL CORPORATION,
Petitioner

v.

GREENTHREAD LLC,
Patent Owner

Case IPR2023-00552
Patent No. 11,121,222

**JOINT REQUEST THAT AGREEMENTS BE TREATED AS
BUSINESS CONFIDENTIAL INFORMATION AND BE KEPT SEPARATE
PURSUANT TO 35 U.S.C. § 317(b) AND 37 C.F.R. § 42.74**

Pursuant to 35 U.S.C. § 317(b) and 37 C.F.R. § 42.74(c), Petitioner Intel Corporation and Patent Owner Greenthread LLC jointly request that the confidential settlement-related agreements (Exhibits 2001 and 2002) filed concurrently herewith, as referenced in the Joint Motion to Terminate *Inter Partes* Review: (a) be treated as business confidential information; (b) be kept separate from the file of the involved patent; and (c) be made available only as permitted pursuant to the provisions of 35 U.S.C. § 317(b) and 37 C.F.R. § 42.74(c). Intel and Greenthread also respectfully request that the Board inform them if anyone seeks production of the agreements and afford them an opportunity to address whether such request is supported by good cause.

Date: April 26, 2023

/s/ Alan Whitehurst

Alan Whitehurst (No. 43,263)
Nicholas T. Matich (No. L1,373)
Arvind Jairam (No. 62,759)
Stuart McCommas (No. 71,834)
MCKOOL SMITH, P.C.
1999 K St. NW, Suite 600
Washington, DC 20006
Telephone: (202) 370-8300
Facsimile: (202) 370-8344
awhitehurst@mckoolsmith.com
nmatich@mckoolsmith.com
ajairam@mckoolsmith.com
smccommas@mckoolsmith.com

Archis "Neil" Ozarkar (No. 71,265)
nozarkar@mckoolsmith.com
MCKOOL SMITH, P.C.
600 Travis Street, Suite 600
Houston, TX 77002
Telephone: (713) 485-7310
Facsimile: (713) 485-7344

Counsel for Patent Owner

Respectfully submitted,

/s/ Robert A. Appleby, P.C.

Robert A. Appleby (No. 40,897)
Gregory S. Arovas (No. 38,818)
Todd M. Friedman, P.C. (No. 42,559)
robert.appleby@kirkland.com
greg.arovas@kirkland.com
todd.friedman@kirkland.com
Postal and Hand-Delivery Address:
KIRKLAND & ELLIS LLP
601 Lexington Avenue
New York, NY 10022
Telephone: (212) 446-4800
Facsimile: (212) 446-4900

Bao Nguyen (No. 46,062)
bnguyen@kirkland.com
Postal and Hand-Delivery Address:
KIRKLAND & ELLIS LLP
555 California Street
San Francisco, CA 94104
Telephone: (415)-439-1400
Facsimile: (415)-439-1500

Counsel for Petitioner

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the above-captioned “JOINT REQUEST THAT AGREEMENTS BE TREATED AS BUSINESS CONFIDENTIAL INFORMATION AND BE KEPT SEPARATE” has been served on Petitioner via email on the following counsel of record for Petitioner:

Robert A. Appleby (Lead Counsel)
robert.appleby@kirkland.com
Gregory S. Arovas (Back-up Counsel)
greg.arovas@kirkland.com
Todd M. Friedman, P.C. (Back-up Counsel)
todd.friedman@kirkland.com
Bao Nguyen (Back-up Counsel)
bao.nguyen@kirkland.com
Intel_Greenthread_IPR@kirkland.com
KIRKLAND & ELLIS LLP
601 Lexington Avenue
New York, NY 10022
Telephone: (212) 446-4800
Facsimile: (212) 446-4900

Dated: April 26, 2023

By /s/ Alan L. Whitehurst
Alan L. Whitehurst (Reg. No. 43,263)