UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

ERICSSON INC,
Petitioner,

v.

DALI WIRELESS INC,
Patent Owner.

Case IPR2023-00700
Patent 9,820,171

JOINT REQUEST TO FILE SETTLEMENT AGREEMENT AS BUSINESS CONFIDENTIAL INFORMATION PURSUANT TO 35 U.S.C. § 317(b) and 37 C.F.R. § 42.74(c)

EXHIBIT LIST

Exhibit No.	Exhibit Description
1001	U.S. Patent No. 9,820,171
1002	Select Portions of the Prosecution History of the '171 Patent
1003	Declaration of Petitioner's Expert Dr. Henry H. Houh
1004	International Application Publication WO 2009/021359 A1
1005	Certified English Translation of Leng (EX-1004)
1006	U.S. Patent No. 8,270,387 ("Cannon")
1007	Institution Decision of IPR2020-01432
1008	U.S. Patent Application Publication US2008/0045254A1 ("Gupta")
1009	U.S. Patent Application Publication US2010/0128676 ("Wu")
1010	U.S. Pat. No. 8,588,614 ("Larsen")
1011	Related Patents
1012	U.S. Provisional Patent Application No. 61/374,593
1013	Prosecution History of U.S. Patent No. 8,682,338
1014	Institution Decision of IPR2022-01212
1015	Claim Construction Order
1016	Claim Construction Order
1017	Claim Construction Order
1018	Joint Claim Construction Statement
1019	Patent Owner's (Dali Wireless, Inc.'s) Opening Claim Construction Brief
1020	Dali-Ericsson Settlement Agreement (CONFIDENTIAL)

Petitioner Ericsson Inc., ("Ericsson") and Patent Owner Dali Wireless, Inc. ("Dali") (collectively, the "Parties") have settled their dispute with respect to U.S. Patent No. 9,820,171 (Case No. IPR2023-00700). The Settlement Agreement fully resolves all disputes relating to U.S. Patent No. 9,820,171 before the district court and the Patent Trial and Appeal Board. *See* Exhibit 1020. Pursuant to 37 C.F.R. § 42.74(b), any agreement or understanding between the parties made in connection with, or in contemplation of, the termination of a proceeding shall be in writing and a true copy shall be filed with the Board before the termination of the trial. Accordingly, the Parties have filed the Settlement Agreement herewith as Exhibit 1020.

Pursuant to 35 U.S.C. § 317(b) and 37 C.F.R. § 42.74(c), the Parties hereby jointly request that Exhibit 1020 is treated as business confidential information, kept separate from the files of the involved patent, and made available only to Federal Government agencies on written request, or to any person on a showing of good cause. The Board authorized the Parties to file this Joint Request on June 28, 2023, via email.

The terms require the Parties to treat the Settlement Agreement as confidential information and limit the Parties' ability to share the Settlement Agreement, or to disclose its contents with third parties. *See* Exhibit 1020. Moreover, the Settlement Agreement does not contain any information material to patentability. As such, the

Parties respectfully request that the Board treat Exhibit 1020 as business confidential information pursuant to 35 U.S.C. § 317(b) and 37 C.F.R. § 42.74(c).

Dated: June 30, 2023

Respectfully submitted,

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CERTIFICATION OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above-captioned *"Joint Request to File Settlement Agreement as Business Confidential Information Pursuant to 35 U.S.C. § 317(b) and 37 C.F.R. § 42.74(c)*" was served in its entirety on 30 June 2023 on Counsel for Patent Owner via filing through the PTACTS System, as well as delivering a copy via electronic mail to the following:

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