

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

TCL ELECTRONICS HOLDINGS LTD. (f/k/a TCL MULTIMEDIA
TECHNOLOGY HOLDINGS, LTD. TCL INDUSTRIES HOLDINGS CO., LTD.
TCL INDUSTRIES HOLDINGS (H.K.) LIMITED TTE TECHNOLOGY, INC.
(d/b/a TCL North America) TTE CORPORATION TCL MOKA
INTERNATIONAL LIMITED TCL MOKA MANUFACTURING S.A. de C.V.
TCL KING ELECTRICAL APPLIANCES (Huizhou) CO. Ltd.
MANUFACTURAS AVANZADAS S.A. de C.V. TCL SMART DEVICE
(VIETNAM) CO., LTD. SHENZHEN TCL NEW TECHNOLOGY CO., LTD.
TCL OPTOELECTRONICS TECHNOLOGY (HUIZHOU) CO., LTD. TCL
OVERSEAS MARKETING LTD. TCL TECHNOLOGY GROUP
CORPORATION (f/k/a TCL Corp.),

Petitioner,

v.

LG ELECTRONICS INC.,

Patent Owner.

IPR2023-00869

Patent 10,499,431

**PARTIES' JOINT REQUEST TO TREAT SETTLEMENT AGREEMENT
AS BUSINESS CONFIDENTIAL AND TO KEEP SEPARATE**

Pursuant to 35 U.S.C. § 317(b) and 37 C.F.R. § 42.74(c), and the Board’s July 17, 2023 e-mail correspondence, TCL Electronics Holdings Ltd. (f/k/a TCL Multimedia Technology Holdings, Ltd.); TCL Industries Holdings Co., Ltd.; TCL Industries Holdings (H.K.) Limited; TTE Technology, Inc. (d/b/a TCL North America); TTE Corporation; TCL Moka International Limited; TCL Moka Manufacturing S.A. de C.V.; TCL King Electrical Appliances (Huizhou) Co. Ltd.; Manufacturas Avanzadas S.A. de C.V.; TCL Smart Device (Vietnam) Co., Ltd.; Shenzhen TCL New Technology Co., Ltd.; TCL Optoelectronics Technology (Huizhou) Co., Ltd.; TCL Overseas Marketing Ltd.; TCL Technology Group Corporation (f/k/a TCL Corp.), and Patent Owner LG Electronics, Inc. (collectively, “the Parties”) jointly request that the true copy of the written settlement agreement filed as Ex. 1030 be treated as business confidential information and be kept separate from the publicly available files of U.S. Patent No. 10,499,431. Exhibit 1030 is filed via the PTAB’s electronic filing system as “Available to Parties and Board Only.” The Parties jointly request that the settlement agreement be made available only to (i) Federal Government agencies on written request or (ii) to any person only on showing of good cause, pursuant to 35 U.S.C. § 317(b) and 37 C.F.R. § 42.74(c). In the event that a third party submits a written request to the Board for a copy of the settlement agreement along with a purported showing of good cause, due to the

highly sensitive nature of the agreement, the Parties respectfully request to be notified of such written request and be given the opportunity to respond thereto.

Dated: July 17, 2023

Respectfully submitted,

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Counsel for Petitioner

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Counsel for Patent Owner

CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. §§ 42.6(e)(4), the undersigned certifies that on July 17, 2023, the foregoing document was served via electronic mail on the following attorneys of record at the indicated e-mail address(es):

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