**UNITED STATES PATENT AND TRADEMARK OFFICE**

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**BEFORE THE PATENT TRIAL AND APPEAL BOARD**

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DJI EUROPE B.V.,

Petitioner

v.

TEXTRON INNOVATIONS INC.,

Patent Owner.

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IPR2023-01105

U.S. Patent 8,332,082

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**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)**

Pursuant to 35 U.S.C. § 317(b) and 37 C.F.R. § 42.74(c), and the Board's authorization via email on February 22, 2024, Petitioner DJI Europe B.V. ("Petitioner" or "DJI") and Patent Owner Textron Innovations Inc. ("Patent Owner" or "Textron") hereby jointly request that the true copy of their Settlement Agreement, filed concurrently herewith as DJI-1030, be treated as business confidential information and be kept separate from the file of the involved patent. Pursuant to 37 C.F.R. § 42.74(b), DJI-1030 is the entire agreement or understanding between the parties made in connection with, or in contemplation of, the termination of this proceeding, and further, DJI-1030 is a true and accurate copy of the agreement between the parties that resolves the present proceeding. Concurrently with the filing of this Request, the parties are filing a Joint Motion to Terminate the above-captioned *inter partes* review.

The parties consider the Settlement Agreement to contain highly sensitive business confidential information that would substantially harm their business interests if publicly disclosed. As such, the parties hereby jointly request that the Settlement Agreement be kept as a separate paper from the file of the involved patent and be made available only to Federal Government agencies on written request, or to any person on a showing of good cause pursuant to 35 U.S.C. § 317(b) and 37 C.F.R. § 42.74(c). The parties further jointly request that in the event a person or entity makes a request for access to the Settlement Agreement, that such

written request be served upon the parties on the day the request is provided to the Board.

Respectfully submitted,

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Date: February 29, 2024

## CERTIFICATE OF SERVICE

The undersigned certifies that a true copy of the **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 electronically on February 29, 2024, in its entirety on the following counsel of record for Patent Owner:

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Respectfully submitted,

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Date: February 29, 2024