IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

TEXTRON SPECIALIZED VEHICLES INC.

Petitioner

v.

SZ DJI TECHNOLOGY CO. LTD.

Patent Owner

Case IPR 2023-01287
U.S. Patent No. 11,482,121

JOINT REQUEST TO KEEP CONFIDENTIAL AND SEPARATE UNDER 35 U.S.C. § 317(b) AND 37 C.F.R. § 42.74(c)

Submitted Electronically

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 23, 2024, Petitioner Textron Specialized Vehicles, Inc. and Patent Owner SZ DJI Technology Co., Ltd. jointly request to file Exhibit 1012, the settlement agreement between the parties, as referenced in the concurrently filed Joint Motion to Terminate, as business confidential information, and to have it be kept separate from the file of the involved patent. Pursuant to 37 C.F.R. § 42.74(b), Exhibit 1012 is the entire agreement or understanding between the parties made in connection with, or in contemplation of, the termination of this proceeding, and further, Exhibit 1012 is a true and accurate copy of the agreement between the parties that resolves the present proceeding.

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 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 "Parties and Board Only."

Date: February 27, 2024

Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned hereby certifies on February 27, 2024, a true and correct copy of the foregoing **JOINT REQUEST TO KEEP CONFIDENTIAL AND SEPARATE UNDER 35 U.S.C. § 317(b) AND 37 C.F.R. § 42.74(c)** was served to the following counsel for Patent Owner by email:

Matthew Argenti (margenti@wsgr.com)
Richard Torczon (rtorczon@wsgr.com)

Date: February 27, 2024

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