

UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE PATENT TRIAL AND APPEAL BOARD

MEDIATEK INC. and NXP USA, INC.,

Petitioner,

v.

BELL NORTHERN RESEARCH, LLC,
Patent Owner

Case: IPR2023-01414
U.S. Patent No. 8,416,862

**JOINT REQUEST THAT SETTLEMENT AGREEMENT BE TREATED AS
BUSINESS CONFIDENTIAL INFORMATION AND BE KEPT SEPARATE
UNDER 35 U.S.C. § 317(B)**

Mail Stop PATENT BOARD
Patent Trial and Appeal Board
U.S. Patent and Trademark Office
P.O. Box 1450
Alexandria, VA 22313-1450

Pursuant to 35 U.S.C. § 317(b) and 37 C.F.R. § 42.74(c), the parties submit concurrently herewith a true copy of their settlement agreement (Ex. 1032) (the “Agreement”) referenced in the Joint Motion to Terminate filed concurrently herewith and hereby request that the Agreement be treated as business confidential information and be kept separate from the file of the involved patent.

The parties consider the Agreement to contain highly sensitive business confidential information that would substantially harm their business interests if publicly disclosed. As such, the parties request that the 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 parties are filing the Agreement for access “Available only to board,” to ensure that no other party will have access to the Agreement. The parties further request that the Board order that in the event a person or entity makes a written request, as stated in 37 C.F.R. § 42.74(c)(1)-(2), for access to the Agreement, that any such written request be served upon the parties on the day the written request is provided to the Board and that the parties be provided an opportunity to respond to the request.

Date: January 15, 2025

/s/ Brian Erickson

Brian Erickson

Reg. No. 48,895

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Attorney for Petitioner NXP USA, Inc.

Dated: January 15, 2025

/Jason Shapiro/

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Attorney for Patent Owner

CERTIFICATE OF SERVICE

I hereby certify that on this 15th day of January, 2025, a copy of the attached **JOINT REQUEST THAT SETTLEMENT AGREEMENT BE TREATED AS BUSINESS CONFIDENTIAL INFORMATION AND BE KEPT SEPARATE UNDER 35 U.S.C. § 317(b)** was served by electronic mail to the attorneys of record, at the following addresses:

BNR-MEDIATEK-IPR@devlinlawfirm.com

Dated: January 15, 2025

Respectfully Submitted,

/Brian K. Erickson/

Brian K. Erickson, Reg. No. 48,895

Attorney for Petitioner