

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAMSUNG ELECTRONICS CO., LTD.;
SAMSUNG ELECTRONICS AMERICA, INC., GARMIN LTD., and
ZEPP HEALTH CORPORATION

Petitioners,

v.

SLYDE ANALYTICS, LLC

Patent Owner.

IPR2024-00006¹
Patent No. 8,588,033 B2

**JOINT REQUEST TO KEEP SEPARATE PURSUANT TO
34 U.S.C. § 317(b) and 37 C.F.R. § 42.74(c)**

¹ GARMIN LTD. filed a petition in IPR2024-00765 and was joined as a petitioner in this proceeding. ZEPP HEALTH CORPORATION filed a petition on IPR2024-00833 and was joined as a petitioner to this proceeding.

Patent Owner Slyde Analytics, LLC (“Slyde”) and Petitioners Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. (collectively “Samsung”) have reached a settlement. The settlement agreement resolves the disputes in the above-captioned inter partes review relating to U.S. Patent No. 8,588,033 (“Patent-in-Suit”). The parties jointly request that the Board treat the settlement agreement as business confidential information and keep it separate from the files of this proceeding and the files of the Patent-in-Suit. The parties were authorized to file this Request by the Board on December 10, 2024 (Paper 32).

I. STATEMENT OF PRECISE RELIEF REQUESTED

The parties jointly request that the Board treat the settlement agreement as business confidential information and keep it separate from the files of this proceeding and the files of the Patent-in-Suit. The parties request that the settlement agreement “be made available only to Federal Government agencies on written request, or to any person on a showing of good cause” in accordance with 35 U.S.C. § 317(b) and 37 C.F.R. § 42.74.

II. REASONS WHY RELIEF IS APPROPRIATE

The terms of the settlement agreement require the parties to treat the settlement agreements as confidential information and limit their ability to share the settlement agreement or disclose its content with third parties. The parties have filed a copy of the settlement agreement with the Board, as required by 35 U.S.C. § 317(b)

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and 37 C.F.R. § 42.74. The confidential settlement agreement was filed in the PTAB E2E system to provide availability only to the Board.

Respectfully submitted,

Dated: December 11, 2024

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UPDATED EXHIBIT LIST

Previously Filed by Petitioner

Exhibit 1001	U.S. Patent No. 8,588,033 (“the ’033 Patent)
Exhibit 1002	Declaration of Benjamin B. Bederson
Exhibit 1003	Curriculum Vitae of Benjamin B. Bederson
Exhibit 1004	Prosecution History of the ’033 Patent (Application No. 13/631,116)
Exhibit 1005	U.S. Patent Application Publication No. 2009/0196124 (“Mooring”)
Exhibit 1006	Japanese Publication No. JP2005/242456 (“Satoshi”)
Exhibit 1007	Certified English translation of Satoshi
Exhibit 1008	U.S. Patent Application Publication No. 2008/0186808 (“Lee”)
Exhibit 1009	U.S. Patent Application Publication No. 2008/0168368 (“Louch”)
Exhibit 1010	U.S. Patent Application Publication No. 2008/0151700 (“Inoue”)
Exhibit 1011	U.S. Patent Application Publication No. 2005/0122844 (“Ruchonnet”)
Exhibit 1012	L.C. Tam, Tom Kong, and R. Du, Physical-Based Simulation of Mechanical Watches and Clocks 1-6 (2007)
Exhibit 1013	Declaration of Mary K. Roach on Authentication of Publication
Exhibit 1014	Linux Watch, https://researcher.watson.ibm.com/researcher/view_group_subpage.php?id=6102 (last visited Sept. 29, 2023).
Exhibit 1015	Lam Chi Tam, Geometry-Based Simulation of Mechanical Movements and Virtual Library 1-113 (2008)
Exhibit 1016	Watch, https://en.wikipedia.org/wiki/Watch (last visited Oct. 1, 2023)
Exhibit 1017	ISBN Search, https://isbnsearch.org/isbn/0791843068 (last visited Oct. 5, 2023)
Exhibit 1018	Palm (PDA), https://en.wikipedia.org/wiki/Palm_(PDA) (last visited Sept. 27, 2023).
Exhibit 1019	<u>L.C. Tam, Y. Fu, and R. Du, Virtual Library of Mechanical Watch Movements 127-136 (2007)</u>
Exhibit 1020	Claim Mapping Table
Exhibit 1021	Chandra Narayanaswami et al., IBM’s Linux Watch: The

	Challenge of Miniaturization 33-41 (2002).
Exhibit 1022	Skeleton Clock, https://en.wikipedia.org/wiki/Skeleton_clock (last visited Oct. 1, 2023)
Exhibit 1023	Benjamin B. Bederson & James D. Hollan, Pad++: A Zooming Graphical Interface for Exploring Alternate Interface Physics 17-26(1994).
Exhibit 1024	David Rogers, Feimo Hou, Chandellet Vuolo & Benjamin B. Bederson, Tossing Objects in a Desktop Environment (1996).
Exhibit 1025	Benjamin B. Bederson, Fisheye Menus 217-225 (2000)
Exhibit 1026	Leslie E Chipman, Benjamin B. Bederson & Jennifer A. Golbeck, SlideBar: Analysis of a linear input device 1-9 (2004).
Exhibit 1027	Hilary Browne et al., Designing a Collaborative Finger Painting Application for Children (2000).
Exhibit 1028	Pekka Parhi, Amy K. Karlson & Benjamin B. Bederson, Target Size Study for One-Handed Thumb Use on Small Touchscreen Devices 203-210 (2006).
Exhibit 1029	Amy K. Karlson, Benjamin B. Bederson & José Contreras-Vidal, Understanding One-Handed Use of Mobile Devices 1-22 (2007).
Exhibit 1030	Test of Time Awards, https://ieevis.org/year/2021/info/awards/test-of-time-awards (last visited Oct. 3, 2023).
Exhibit 1031	Test of Time Awards, https://ieevis.org/year/2022/info/awards/test-of-time-awards (last visited Oct. 3, 2023).
Exhibit 1032	Takeo Igarashi & Ken Hinckley, Speed-dependent Automatic Zooming for Browsing Large Documents 139-148 (2000).
Exhibit 1033	Skeleton watch, https://en.wikipedia.org/wiki/Skeleton_watch (last visited Oct. 1, 2023)
Exhibit 1034	Laurie Kahle, All is Revealed (March/April 2016)
Exhibit 1035	Analog watch, https://en.wikipedia.org/wiki/Analog_watch (last visited Oct. 1, 2023)
Exhibit 1036	Quartz clock, https://en.wikipedia.org/wiki/Quartz_clock (last visited Oct. 1, 2023)
Exhibit 1037	Joshua Munchow, Here's Why The Crown Is The Unsung Hero Of Watchmaking (And Why Rolex Wears The Crown),

	https://quillandpad.com/2018/12/09/heres-why-the-crown-is-theunsung-hero-of-watchmaking-and-why-rolex-wears-the-crown/ (last visited Oct. 2, 2023)
Exhibit 1038	U.S. Patent No. 3,146,580 (“Simon”)
Exhibit 1039	U.S. Patent No. 3,362,154 (“Perret”)
Exhibit 1040	Kinetics (physics), https://en.wikipedia.org/wiki/Kinetics_(physics) (last visited Oct. 2, 2023)
Exhibit 1041	Dynamics (mechanics), https://en.wikipedia.org/wiki/Dynamics_(mechanics) (last visited Oct. 2, 2023)
Exhibit 1042	Gear train, https://en.wikipedia.org/wiki/Gear_train (last visited Oct. 2, 2023)
Exhibit 1043	Mechanical watch, https://en.wikipedia.org/wiki/Mechanical_watch (last visited Oct. 2, 2023)
Exhibit 1044	Accelerometer, https://en.wikipedia.org/wiki/Accelerometer (last visited Oct. 2, 2023)
Exhibit 1045	Benjamin Arthur, Parts of a Mechanical Watch – An Illustrated Guide, https://www.benswatchclub.com/blog/parts-of-a-mechanical-watch (last visited Oct. 2, 2023)
Exhibit 1046	L.C. Tam, Tom Kong, and R. Du, Physical Based Solutions of Mechanical Watches and Clocks, https://asmedigitalcollection.asme.org/IMECE/proceedingsabstract/IMECE2007/43068/123/325857 (last visited Oct. 5, 2023)
Exhibit 1047	Declaration of Rachel J. Waters on Authentication of Publication
Exhibit 1048	Automatic, https://www.collinsdictionary.com/us/dictionary/english/automatic (last visited Oct. 5, 2023)
Exhibit 1049	Matthew Catellier, How Accurate Should Your Mechanical Watch

	Be?, https://www.watchreviewblog.com/how-accurate-shouldmechanical-watchbe/#:~:text=A%20non%2Dcertified%20watch%2C%20meanwhile,watch%20about%20once%20a%20week (last visited Oct. 10, 2023).
Exhibit 1050	Pusher, https://www.watch-wiki.net/doku.php?id=pusher (last visited October 10, 2023).
Exhibit 1051	Stipulation Regarding Invalidity Challenges
Exhibit 1052	Supplemental Declaration of Benjamin B. Bederson
Exhibit 1053	https://www.itprotoday.com/microsoft-windows/watch-out-spot-devices-due-this-fall (last visited Nov. 11, 2024)
Exhibit 1054	https://news.microsoft.com/2002/11/17/microsoft-launches-smart-personal-object-technology-initiative/ (last visited Nov. 11, 2024)
Exhibit 1055	https://www.gsmarena.com/lg_gd910-2644.php (last visited Nov. 11, 2024)
Exhibit 1056	https://www.computinghistory.org.uk/det/43164/matsucom-OnHand-PC/
Exhibit 1057	Benjamin B. Bederson. (1992). A Miniature Space-Variant Active Vision System: Corext-I. New York University Dissertation, Computer Science Department.
Exhibit 1058	Benjamin B. Bederson. (1995). Audio Augmented Reality: A Prototype Automated Tour Guide. ACM CHI Conference Companion, pp. 210-211
Exhibit 1059	Benjamin B. Bederson, Aaron Clamage, Mary Czerwinski, and George Robertson. 2004. <i>DateLens: A Fisheye Calendar Interface for PDAs</i> . ACM Transactions on Computer-Human Interaction. Vol 11, No. 1. March 2004, pp. 90-119.
Exhibit 1060	Benjamin B. Bederson, Amir Khella, 2004, “Pocket PhotoMesa: A Zoomable Image Browser for PDAs”
Exhibit 1061	iPod Nano 6 th Gen User Guide, 2010
Exhibit 1062	Sony LiveView User Guide, 2010
Exhibit 1063	Microsoft Computer Dictionary Fifth Edition, 2002
Exhibit 1064	US Patent Application No. 2005/0278757 to Grossman et al.
Exhibit 1065	US Patent No. 11,061,524 to Bederson et. al
Exhibit 1066	Complaint from <i>Slyde v. Apple</i> , Case No. 2:24-cv-003310-RWS-RSP, Dkt. 1 (E.D. Tex.).
Exhibit 1067	https://web.archive.org/web/20090322202310/http://www.tinyos.net/ (last visited Nov. 11, 2024)
Exhibit 1068	https://appledb.dev/device/iPod-nano-(6th-generation).html (last visited Nov. 11, 2024)
Exhibit 1069	https://arstechnica.com/gadgets/2011/01/6g-ipod-nano-hack-just-beginning-of-long-road-to-nano-apps/ (last visited Nov. 11, 2024)

Exhibit 1070	Transcript of Deposition of Mr. Blackadar (Ex. 1052) (“Blackadar Tr.”)
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Currently Filed by Petitioner

Exhibit 1071	Samsung’s Settlement and License Agreement
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CERTIFICATE OF SERVICE

A copy of the foregoing Request to Keep Separate was served in its entirety by filing this document through the PTAB P-TACTS System, as well as by email, on Patent Owner's and Co-Petitioners' counsel of record as follows:

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