

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

GOOGLE LLC, SAMSUNG ELECTRONICS CO. LTD.,
AND SAMSUNG ELECTRONICS AMERICA, INC.,
Petitioner

v.

MULTIMODAL MEDIA LLC,
Patent Owner.

Case No. IPR2024-00053
U.S. Patent No. 8,107,978

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

LIST OF EXHIBITS¹

Ex-1001	U.S. Patent No. 8,107,978
Ex-1002	Declaration of Dr. Benjamin B. Bederson
Ex-1003	Curriculum Vitae of Dr. Benjamin B. Bederson
Ex-1004	File History of U.S. Patent No. 8,107,978
Ex-1005	PCT Publication WO2001/013656 (“Bengtsson”)
Ex-1006	PCT Publication WO2007/020627 (“Roujinsky”)
Ex-1007	U.S. Patent Publication 2005/0136955 (“Mumick’955”)
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Ex-1009	INTENTIONALLY LEFT BLANK
Ex-1010	INTENTIONALLY LEFT BLANK
Ex-1011	INTENTIONALLY LEFT BLANK
Ex-1012	INTENTIONALLY LEFT BLANK
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Ex-1015	INTENTIONALLY LEFT BLANK
Ex-1016	INTENTIONALLY LEFT BLANK
Ex-1017	INTENTIONALLY LEFT BLANK
Ex-1018	INTENTIONALLY LEFT BLANK
Ex-1019	INTENTIONALLY LEFT BLANK

¹ Four-digit pin citations that begin with 0 are to the branded numbers added by Petitioner in the bottom right corner of the exhibits. All other pin citations are to original page, column, paragraph, or line numbers.

Ex-1020	INTENTIONALLY LEFT BLANK
Ex-1021	<i>Multimodal Media LLC v. Guangdong Oppo Mobile Telecommunications Corp., Ltd.</i> , 2:21-cv-00436, D.I. 65 (E.D. Tex. Apr. 24, 2023) (Claim Construction Order) (“ <i>Oppo</i> Litigation”)
Ex-1022	<i>Multimodal Media LLC v. TCL Technology Group Corporation et al.</i> , 2:22-cv-00463, D.I. 23 (E.D. Tex. Feb. 22, 2023) (Stay Order) (“ <i>TCL</i> litigation”)
Ex-1023	<i>Multimodal Media LLC v. Samsung Electronics Co., Ltd. et al.</i> , 2:22-cv-00462, Infringement Contentions (E.D. Tex. May 30, 2023) (“ <i>Samsung</i> Infringement Contentions”)
Ex-1024	U.S. Patent Publication 2008/0219416 (“Roujinsky-US”)
Ex-1025	Alok Sinha, Client-server computing (1992), Communications of the ACM, 35, 7 (July 1992), 77–98, DOI: https://doi.org/10.1145/129902.129908
Ex-1026	Benjamin B. Bederson & James D. Hollan, Pad++: A Zooming Graphical Interface for Exploring Alternate Interface Physics, UIST ‘94 Proceedings of the 7th Annual ACM Symposium on User Interface Software and Technology 17 (1994), DOI: http://dx.doi.org/10.1145/192426.192435
Ex-1027	Tim Berners-Lee, Robert Cailliau, Ari Luotonen, Henrik Frystyk Nielsen, and Arthur Secret, The World-Wide Web (1994), Communications of the ACM 37, 8 (August 1994), 76-82, DOI: http://dx.doi.org/10.1145/179606.179671
Ex-1028	INTENTIONALLY LEFT BLANK
Ex-1029	C.J. Date, An Introduction to Database Systems at 8 (7th ed. 2000)
Ex-1030	Nokia 3250 User Guide (2006), available at: https://ia801806.us.archive.org/32/items/manualzilla-id-5923903/5923903.pdf
Ex-1031	David Dearman, Amy Karlson, Brian Meyers, and Ben Bederson, Multi-modal text entry and selection on a mobile device (2010), In

	Proceedings of Graphics Interface 2010 (GI '10), Canadian Information Processing Society, CAN, 19–26
Ex-1032	AOL Instant Messenger Registration page (1999), available at: https://web.archive.org/web/19991127133324/http://aim.aol.com/?promo=106712&pageset=Aim
Ex-1033	Newsroom, Apple Reinvents the Phone with iPhone (Jan. 9, 2007), available at: https://www.apple.com/newsroom/2007/01/09Apple-Reinvents-the-Phone-with-iPhone/
Ex-1034	U.S. Patent Publication 2007/0150830
Ex-1035	Webster's New World Computer Dictionary 264-65 (10th ed. 2003)
Ex-1036	Elia Palme, Chuan-Hoo Tan, Juliana Sutanto, and Chee Wei Phang, Choosing the smart phone operating system for developing mobile applications (2010), In Proceedings of the 12th International Conference on Electronic Commerce: Roadmap for the Future of Electronic Business (ICEC '10), Association for Computing Machinery, New York, NY, USA, 146–152, DOI: https://doi.org/10.1145/2389376.2389397
Ex-1037	Microsoft Computer Dictionary 378 (5th ed. 2002)
Ex-1038	RealPlayer 8 Plus User Manual (Rev. 1.0) (2000), available at: https://www.itya.unam.mx/computo/sites/manuales/realplayer/rp8manualfull.pdf
Ex-1039	The Wayback Machine Archive, Pine Information Center, Frequently Asked Questions, University of Washington (Oct. 4, 2000), available at: https://web.archive.org/web/20010410095757/http://www.washington.edu/pine/faq/sendreceive.html
Ex-1040	Nokia 9300 User Guide (2005), available at: https://www.manualslib.com/download/756822/Nokia-9300.html
Ex-1041	Jackson Phipps, The History of PPC and Google Ads, 2060 Digital, available at: https://2060digital.com/blog/the-history-of-ppc-and-google-ads/#:~:text=In%202000%2C%20Google%20rolled%20out,digital%20advertisers%20across%20the%20world

Ex-1042	INTENTIONALLY LEFT BLANK
Ex-1043	PCT Publication WO2006/020938 (“Mumick’938)
Ex-1044	INTENTIONALLY LEFT BLANK
Ex-1045	INTENTIONALLY LEFT BLANK
Ex-1046	<i>Multimodal Media LLC v. Guangdong Oppo Mobile Telecommunications Corp., Ltd.</i> , 2:21-cv-00436, D.I. 74 (E.D. Tex. Sept. 6, 2023) (Order of Dismissal)
Ex-1047	Stipulation Regarding Invalidity Challenges, <i>Multimodal Media LLC v. Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc.</i> , Case No. 2:22-cv-00462-JRG-RSP (E.D. Tex. Apr. 9, 2024)
Ex-1048	Google’s Settlement and Patent License Agreement and Samsung’s Settlement and Patent License Agreement

Petitioners Google LLC, Samsung Electronics Co., Ltd., and Samsung Electronics America, Inc. (“Petitioners”) and Patent Owner Multimodal Media LLC (“Patent Owner”) have reached a settlement. The settlement agreement resolves the disputes in the above-captioned *inter partes* review relating to U.S. Patent No. 8,107,978 (“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 Joint Request by the Board (via email) on July 26, 2024.

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 release agreement 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) 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.

Dated: July 29, 2024

Respectfully submitted,

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CERTIFICATE OF SERVICE UNDER 37 C.F.R. § 42.6(E)(4)

The undersigned hereby certifies that on July 29, 2024 the foregoing **JOINT REQUEST TO KEEP SEPARATE** was served via electronic mail, in its entirety, on Patent Owner's attorneys of record in IPR2024-00053.

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