UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

PALO ALTO NETWORKS, INC. and
FORTINET, INC.,
Petitioners

v.

LIONRA TECHNOLOGIES LTD.,
Patent Owner

Inter Partes Review Case No. IPR2023-00703
U.S. Patent No. 8,566,612

JOINT REQUEST THAT SETTLEMENT AGREEMENT BE TREATED AS BUSINESS CONFIDENTIAL INFORMATION AND BE KEPT SEPARATE PURSUANT TO 35 U.S.C. § 317(b) AND 37 C.F.R. § 42.74[1]

[1] The Board joined Palo Alto Networks, Inc. and Fortinet, Inc. as parties (Petitioner) to this proceeding via a Motion for Joinder in IPR2024-00099 and IPR2024-00158. The Board previously terminated Petitioner Cisco Systems, Inc. from this proceeding.

Pursuant to 35 U.S.C. § 317(b) and 37 C.F.R. § 42.74(c), Petitioner Palo Alto Networks, Inc. ("Palo Alto") and Patent Owner Lionra Technologies Ltd. ("Lionra") jointly request that the settlement agreement between the parties filed concurrently herewith as Ex. 1020, as referenced in the Joint Motion to Terminate Proceeding, be treated as business confidential information and be kept separate from the file of the '612 patent.

Palo Alto and Lionra consider the settlement agreement (Ex. 1020) to contain highly sensitive business confidential information that would substantially harm their business interests if publicly disclosed. As such, Palo Alto and Lionra hereby jointly request that the agreement be treated as business confidential and 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 terms of the agreement require the parties to treat the agreement as confidential information and limit the Parties' ability to share the same, or to disclose its contents with third parties. See Exhibit 1020. The agreement has been filed for access "Available only to board." Palo Alto and Lionra further jointly 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. Both parties also respectfully request that the Board

inform them if anyone seeks production of Exhibit 1020 and afford the parties an opportunity to address whether such request is supported by good cause.

Accordingly, the Parties respectfully request that the Board treat Exhibit 1020 as business confidential information pursuant to 35 U.S.C. § 317(b) and 37 C.F.R. § 42.74(c)

Date: September 20, 2024

Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that the above-captioned "JOINT REQUEST THAT SETTLEMENT AGREEMENT BE TREATED AS BUSINESS CONFIDENTIAL INFORMATION AND BE KEPT SEPARATE" was served in its entirety on September 20, 2024, by filing this document through the Patent Trial and Appeal Case Tracking System as well as delivering a copy via electronic mail upon the following attorneys of record for the Patent Owner:

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