

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

NXP USA, INC., et al.,
Petitioners,

v.

BELL SEMICONDUCTOR, LLC,
Patent Owner.

Case IPR2024-00168
Patent 7,345,245

**PATENT OWNER'S UNOPPOSED REQUEST THAT AGREEMENT BE
TREATED AS BUSINESS CONFIDENTIAL INFORMATION AND
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

UPDATED EXHIBIT LIST

Exhibit	Description
2001	Expert Declaration of Dr. Joseph Bernstein in Support of Patent Owner's Preliminary Response
2002	Disclaimer in a Patent Under 37 CFR 1.321(a) for U.S. 7,345,245
2003	Expert Declaration of Dr. Joseph Bernstein in Support of Patent Owner's Response
2004	August 15, 2024 Deposition Transcript of R. Jacob Baker, Ph.D.
2005	William Strunk, Jr., et al., The Elements of Style, 4th Ed. 94-95 (2000)
2006	Declaration of Christopher Clayton
2007	CONFIDENTIAL Agreement (BOARD ONLY)
2008	CONFIDENTIAL Agreement (BOARD ONLY)

Pursuant to 35 U.S.C. § 317(b) and 37 C.F.R. § 42.74(c), Patent Owner Bell Semiconductor, LLC (“Bell Semic” or “Patent Owner”) is submitting concurrently herewith a true copy of the agreement between Bell Semic and the third-party (Ex. 2008) (the “Bell Semic Agreement”) referenced in the Joint Motion to Terminate filed concurrently herewith by Petitioner and hereby requests that the Bell Semic Agreement be treated as business confidential information and be kept separate from the file of the involved patent. Petitioner NXP USA, Inc. (“NXP” or “Ppetitioner NXP”) does not oppose this Request.

Bell Semic considers the Bell Semic Agreement to contain highly sensitive business confidential information that would substantially harm Bell Semic’s business interests if publicly disclosed. As such, Bell Semic requests that the Bell Semic 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 Bell Semic Agreement is being filed for access “Available Only to Board,” to preserve the confidentiality of the agreements by preventing other parties in this proceeding from accessing the agreement. Bell Semic further requests 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 Bell Semic Agreement, that any such written request be served upon Bell Semic on the day the written request is provided to the Board and that Bell Semic be provided an opportunity to respond to the request.

Respectfully submitted,

Dated: February 10, 2025

/Jason M. Shapiro/
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CERTIFICATE OF SERVICE

Pursuant to 37 CFR § 42.6(e), the undersigned certifies that on February 10, 2025, a complete and entire copy of this filing was provided by email by serving the correspondence addresses of record as follows:

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