

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

CISCO SYSTEMS, INC.,

Petitioner

v.

VIDEO SOLUTIONS PTE. LTD.,

Patent Owner

IPR2024-00194

U.S. Patent No. 9,204,099

**JOINT REQUEST TO TREAT SETTLEMENT AGREEMENT
AS BUSINESS CONFIDENTIAL INFORMATION AND
BE KEPT SEPARATE UNDER 35 U.S.C. § 317(b)**

Pursuant to 35 U.S.C. § 317(b) and 37 C.F.R. § 42.74(c), Petitioner Cisco Systems, Inc. (“Cisco”) and Patent Owner Video Solutions Pte. Ltd. (“Video Solutions”) jointly request that the confidential Settlement Agreement between the parties regarding termination (Ex.1041) be treated as business confidential information and be kept separate from the file of the involved patent. Concurrently with the filing of this Request, Petitioner and Patent Owner are filing a Joint Motion to Terminate *Inter Partes* Review due to the settlement between the parties.

The terms of the Settlement Agreement require that the Settlement Agreement be kept confidential. The parties consider the Settlement Agreement contains highly sensitive business confidential information that would substantially harm their business interests if publicly disclosed. As such, the parties hereby jointly request that the Settlement Agreement be kept separate from the file of the involved patent and to be made available only under the provisions of 35 U.S.C § 317(b) and 37 C.F.R. § 42.74(c).

Respectfully submitted,

Date: December 18, 2024

/Theodore M. Foster/

Theodore M. Foster
Counsel for Petitioner
Registration No. 57,456

/Christopher C. Hoff/

Christopher C. Hoff
Counsel for Patent Owner
Registration No. 67,738

CERTIFICATE OF SERVICE

The undersigned certifies, under 37 C.F.R. § 42.6, that service was made on the Patent Owner as detailed below.

Date of service December 18, 2024

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Documents served **Joint Motion to Terminate *Inter Partes* Review;
Joint Request to Treat Settlement Agreement As Business
Confidential Information and Be Kept Separate; Exhibit
Ex.1041.**

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