UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

FREEWHEEL MEDIA, INC.,
Petitioner,

v.

INTENT IQ, LLC,
Patent owner.

Case IPR2024-00419
Patent 11,564,015

JOINT REQUEST THAT THE RELEASE AGREEMENT BE TREATED 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 FreeWheel Media, Inc. ("Petitioner") and Patent Owner Intent IQ, LLC ("Patent Owner") (collectively, the "Parties") hereby jointly request that the true copy of their release agreement, filed concurrently herewith as Exhibit 1101, be treated as business confidential information and be kept separate from the file of this *inter partes* review (IPR) proceeding. Concurrently with the filing of this Request, the Parties are filing a Joint Motion to Terminate *Inter Partes* Review due to the settlement between the Parties.

The Parties consider the release agreement to contain highly sensitive business confidential information that would substantially harm their business interests if publicly disclosed. As such, the Parties hereby jointly request that the release 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 release agreement has been filed for access as "Board Only." The Parties 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 release agreement, that any such written request be served upon the Parties on the day the written request is provided to the Board.

Dated: July 7, 2025

Respectfully submitted

/Frederic M. Meeker/

Frederic M. Meeker
Reg. No. 35,282
Banner & Witcoff, Ltd.
Attorney for Petitioner
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Dated: July 7, 2025

Respectfully submitted

/Reza Mirzaie/

Reza Mirzaie
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Attorney for Patent Owner

CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6(e), I hereby certify that I caused a true and correct copy of this JOINT REQUEST THAT THE RELEASE AGREEMENT BE TREATED AS BUSINESS CONFIDENTIAL INFORMATION AND BE KEPT SEPARATE UNDER 35 U.S.C. § 317(b) in connection with IPR2024-00419 to be served via e-mail on July 7, 2025, in its entirety on the following counsel of record for Patent Owner:

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Dated: July 7, 2025

By: /Carlos Goldie/

Carlos Goldie