

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

TOYOTA MOTOR CORPORATION

Petitioner

v.

INFOGATION CORPORATION

Patent Owner

Case No. IPR2024-00756
U.S. Patent No. 6,292,743

**JOINT REQUEST TO KEEP SEPARATE PURSUANT TO
35 U.S.C. § 371(b) AND 37 C.F.R. § 42.74(c)**

TABLE OF EXHIBITS

Exhibit	Description
1001	U.S. Patent No. 6,292,743 to Pu
1002	Prosecution File History of U.S. Patent No. 6,292,743
1003	Declaration of William Michalson, Ph.D.
1004	International Publication No. WO 96/00373 (“Behr”)
1005	National Intelligent Transportation Systems (ITS) Architecture: Standards Requirements Package 03 (Information Service Provider Wireless Interfaces) (retrieved from the Wayback Machine in association with the Wayback URL: https://web.archive.org/web/19970214063822/http://www.itsa.org/public/archdocs/NAR/srp.zip (http://www.itsa.org/public/archdocs/NAR/srp.zip on or before February 14, 1997))
1006	National Intelligent Transportation Systems (ITS) Architecture: Logical Architecture Volume 1 (Description) (retrieved from the Wayback Machine in association with the Wayback URL: https://web.archive.org/web/19970214054941/http://www.itsa.org/public/archdocs/NAR/logical.zip (http://www.itsa.org/public/archdocs/NAR/logical.zip on or before February 14, 1997))
1007	National Intelligent Transportation Systems (ITS) Architecture: Logical Architecture Volume 2 (Process Specifications) (retrieved from the Wayback Machine in association with the Wayback URL: https://web.archive.org/web/19970214054941/http://www.itsa.org/public/archdocs/NAR/logical.zip (http://www.itsa.org/public/archdocs/NAR/logical.zip on or before February 14, 1997))
1008	National Intelligent Transportation Systems (ITS) Architecture: Logical Architecture Volume 3 (Data Dictionary)

	(retrieved from the Wayback Machine in association with the Wayback URL: https://web.archive.org/web/19970214054941/http://www.itsa.org/public/archdocs/NAR/logical.zip (http://www.itsa.org/public/archdocs/NAR/logical.zip on or before February 14, 1997))
1009	National Intelligent Transportation Systems (ITS) Architecture: Implementation Strategy Appendix A (Detailed Market Package Definitions) (retrieved from the Wayback Machine in association with the Wayback URL: https://web.archive.org/web/19970214063148/http://www.itsa.org/public/archdocs/NAR/is.zip (http://www.itsa.org/public/archdocs/NAR/is.zip on or before February 14, 1997))
1010	National Intelligent Transportation Systems (ITS) Architecture: Executive Summary (retrieved from the Wayback Machine in association with the Wayback URL: https://web.archive.org/web/19970214054553/http://www.itsa.org/public/archdocs/NAR/exsum.zip (http://www.itsa.org/public/archdocs/NAR/exsum.zip on or before February 14, 1997))
1011	National Intelligent Transportation Systems (ITS) Architecture: Standards Development Plan (retrieved from the Wayback Machine in association with the Wayback URL: https://web.archive.org/web/19970214063304/http://www.itsa.org/public/archdocs/NAR/sdp.zip (http://www.itsa.org/public/archdocs/NAR/sdp.zip on or before February 14, 1997))
1012	National Intelligent Transportation Systems (ITS) Architecture: Mission Statement (retrieved from the Wayback Machine in association with the Wayback URL:

	https://web.archive.org/web/19970214055038/http://www.itsa.org/public/archdocs/NAR/mission.zip (http://www.itsa.org/public/archdocs/NAR/mission.zip on or before February 14, 1997))
1013	U.S. Patent No. 5,982,298 (Lappenbusch)
1014	U.S. Patent No. 6,680,694 (Knockeart)
1015	U.S. Patent No. 5,059,965 (Geiser)
1016	U.S. Patent No. 5,237,323 (Saito)
1017	Japan Patent Application Publication No. JPH10-221091 (JP091)
1018	Japan Patent Application Publication No. JPH08-110230 (JP230)
1019	ITS Brochure (retrieved from the Wayback Machine in association with the Wayback URL: https://web.archive.org/web/19970624013455/http://www.its.dot.gov/architecture/brochure.html (http://www.its.dot.gov/architecture/brochure.html on or before June 24, 1997))
1020	Overview of the National Architecture (retrieved from the Wayback Machine in association with the Wayback URL: https://web.archive.org/web/19970131030735/https://www.its.dot.gov/architecture/overview.html (https://www.its.dot.gov/architecture/overview.html on or before January 31, 1997))
1021	National ITS Architecture Documents (retrieved from the Wayback Machine in association with the Wayback URL: https://web.archive.org/web/19970214033013/http://www.itsa.org/public/archdocs/national.html (http://www.itsa.org/public/archdocs/national.html on or before February 14, 1997))
1022	ITSA Homepage

	(retrieved from the Wayback Machine in association with the Wayback URL: https://web.archive.org/web/19970214032637/http://www.itsa.org/index.html (http://www.itsa.org/index.html on or before February 14, 1997))
1023	ITSA Public Programs, Notices & Announcements (retrieved from the Wayback Machine in association with the Wayback URL: https://web.archive.org/web/19970214032150/http://www.itsa.org:80/public/notice.html (http://www.itsa.org/public/notice.html on or before February 14, 1997))
1024	ITSA Benefits of Membership (retrieved from the Wayback Machine in association with the Wayback URL: https://web.archive.org/web/19970214032110/http://www.itsa.org/public/benefits.html (http://www.itsa.org/public/benefits.html on or before February 14, 1997))
1025	The U.S. Department of Transportation's ITS Standards Program 1996 Status Report (retrieved from the Wayback Machine in association with the Wayback URL: https://web.archive.org/web/19970624010219/http://www.its.dot.gov/standards/docs/REPORT96.htm (http://www.its.dot.gov/standards/docs/REPORT96.htm on or before June 24, 1997))
1026	ITS Deployment Guidance for Transit Systems (April 1997)
1027	U.S. Patent No. 6,240,360 (Phelan)
1028	U.S. Patent No. 6,591,263 (Becker)
1029	Federal Register Notice 96-4184
1030	Federal Register Notice 97-18983
1031	U.S. Patent No. 6,098,016 (Ishihara)

1032	Public Roads Magazine, Vol. 61 No. 2 (September/October 1997)
1033	Curriculum Vitae of William Michalson, Ph.D
1034	U.S. Patent No. 4,502,123 (Minami)
1035	R.L. French, “Automobile navigation: Where is it going?,” Aerospace and Electronic Systems Magazine, pp. 6-12, May 1987 (French)
1036	“Route Guidance Systems for Improving Urban Travel and Location Choices,” Transportation Research Part A: General, Vol. 22A, No. 4, pp.275-281, Pergamon Press, 1988 (Boyce)
1037	B. Coppock et. al., History of GIS, Geographical Information Systems: Principles and Applications, Vol. 1, Longman Group, pp. 21-34, 1991 (Coppock)
1038	Peuquet, A Conceptual Framework And Comparison Of Spatial Data Models, Cartographica, Vol. 21, No. 4, pp. 66–113, 1984 (Peuquet)
1039	P. Davies, et.al., “Assessment of Technologies for Relieving Urban Traffic Congestion,” National Cooperative Highway Research Program Report 340, Transportation Research Board, December 1991 (Davies)
1040	Kopitz, RDS: The Radio Data System, 1999
1041	The Proceedings of the 1992 Annual Meeting of IVHS America Vol. 2, 1992 (TRAVTEK)
1042	Lanter, User-Centered Graphical User Interface Design for GIS, National Center for Geographic Information and Analysis Report 91-6, 1991
1043	White, Car Navigation Systems, Geographical Information Systems: Principles and Applications, D.J. Maguire, et. al., eds., Vol. 2, pp. 115-125, Longman Group, 1991
1044	“Automobile navigation system using beacon information,” IEEE 1989 Vehicle Navigation and Information Systems Conference, pp. 139-145, Toronto, 11-13 Sep 1989 (Saito)

1045	Guzolek, J.; Koch, E.; “Real-time route planning in road networks,” 1989 Vehicle Navigation and Information Systems Conference, pp. 165-169, Toronto, Ont., Canada, 11-13 Sep 1989 (Guzolek)
1046	Rosen, D.A.; Mammano, F.J.; Favout, R.; “An electronic route-guidance system for highway vehicles,” IEEE Transactions on Vehicular Technology, vol. 19, no. 1, pp. 143-152, Feb 1970 (Rosen)
1047	UK Patent Application GB 2,079,453, filed July 1980 (Wootton)
1048	Certified Translation of JP091
1049	Certified Translation of JP230
1050	Declaration of Fadi N. Kiblawi
1051	Toyota’s Settlement Agreement

Patent Owner Infogation Corporation (“Infogation”) and Petitioner Toyota Motor Corporation (“Toyota”) have reached a settlement. The settlement agreement resolves the disputes in the above-captioned *inter partes* review relating to U.S. Patent No. 6,292,743 (“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 October 2, 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 settlement 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 P-TACTS system to provide availability only to the Board.

Respectfully submitted,

/William H. Mandir/

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WASHINGTON OFFICE
23373
CUSTOMER NUMBER

Date: OCTOBER 3, 2024

CERTIFICATE OF SERVICE

The undersigned certifies that the above document was served on October 3, 2024, by delivering a copy via electronic mail upon the following correspondence addresses of record as follows:

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