Attorney Docket No. 278177-546190

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

Solventum Corporation,
Petitioner,

v.

M.E.A.C. Engineering Ltd.,
Patent Owner.

Case IPR2024-01001
Patent 8,806,554

PETITIONER'S UNOPPOSED MOTION TO TREAT SETTLEMENT AGREEMENT AS BUSINESS CONFIDENTIAL INFORMATION

PETITIONER'S UPDATED LIST OF EXHIBITS

Exhibit No.	Description
1001	USPN 8,858,534 to Adahan (the '554 Patent) (Patent under *Inter Partes Review*)
1002	File History for USPN 8,506,554
1003	USPN 3,572,340 to Lloyd et al. ("*Lloyd*")
1004	USPN 4,569,674 to Phillips et al. ("*Phillips*")
1005	Canadian Patent No. 2,596,321 to Henley et al. ("*Henley*")
1006	USPN 5,636,643 to Argenta et al. ("*Argenta*")
1007	Declaration of Morten Olgaard Jensen in Support of Petition for *Inter Partes* Review of the '534 Patent
1008	*Curriculum Vitae* of Morten Olgaard Jensen
1009	WO 03/030966 to Bitel et al. ("*Bitel*")
1010	USPN 5,599,333 to Atkinson ("*Atkinson*")
1011	Int'l Patent App. No. WO 98/52626 to Mantell et al. ("*Mantell*")
1012	USPN 8,157,792 to Dolliver ("*Dolliver*")
1013	USPN 6,648,862 to Watson ("*Watson*")
1014	Confidential Settlement Agreement Between Solventum Corporation and M.E.A.C. Engineering Ltd. [FILED UNDER SEAL]

Pursuant to 35 U.S.C. § 317 and 37 C.F.R. § 42.74, and the authorization provided in the Board's September 10, 2024, Order, Paper 6, Petitioner Solventum Corporation moves to terminate the above-captioned proceeding. Patent Owner does not oppose this motion. Patent Owner has only filed a power of attorney in the above-captioned proceeding, Patent Owner has not filed its preliminary response, and the Board has not issued an Institution Decision. As permitted by statute, Petitioner Solventum Corporation requests that the Board treat as business confidential information, the true and complete copy of the settlement agreement between Solventum Corporation and M.E.A.C. Engineering Ltd. (Confidential Exhibit 1014), filed concurrently herewith.

35 U.S.C. § 317(b) provides in relevant part that:

> [a]t the request of a party to the proceeding, the agreement or understanding shall be treated as business confidential information, shall be kept separate from the file of the involved patents, and shall be made available only to Federal Government agencies on written request, or to any person on a showing of good cause.

Similarly, 37 C.F.R. § 42.74(c) provides that:

> A party to a settlement may request that the settlement be treated as business confidential information and be kept separate from the files of an involved

patent or application. The request must be filed with the settlement. If a timely request is filed, the settlement shall only be available:

(1) To a Government agency on written request to the Board; or

(2) To any other person upon written request to the Board to make the settlement agreement available, along with the fee specified in § 42.15(d) and on a showing of good cause.

The present request, which is being filed contemporaneously with the confidential settlement agreement, is timely and complies with the foregoing authority. Petitioner therefore respectfully request that the settlement agreement (Confidential Exhibit 1014):

i. be treated as business confidential information,

ii. be maintained separate from the publicly available file of the involved patent as available to the Board only, and

iii. be made available only to Federal Government agencies on written request, or to persons showing good cause on written request, pursuant to 35 U.S.C. § 317(b) and 37 C.F.R. § 42.74(c).

Dated: October 9, 2024

Respectfully submitted:

/Scott D. Barnett/

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Certificate of Service

I hereby certify that on the 9th day of October 2024, I caused a complete copy of PETITIONER'S UNOPPOSED MOTION TO TREAT SETTLEMENT AGREEMENT AS BUSINESS CONFIDENTIAL INFORMATION to be served on the Patent Owner of the subject Patent by electronic mail as follows:

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