

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

CELLCO PARTNERSHIP D/B/A VERIZON WIRELESS,
VERIZON CORPORATE SERVICES GROUP INC.,
T-MOBILE USA, INC., and AT&T SERVICES, INC.,
Petitioners,

v.

HEADWATER RESEARCH LLC,
Patent Owner.

IPR2024-01041
Patent 8,924,543 B2

**JOINT REQUEST TO KEEP SEPARATE PURSUANT TO
35 U.S.C. § 317(b) AND 37 C.F.R. § 42.74(c)**

Patent Owner has entered into license agreements (Exhibits 2004–2007) relating to each of Petitioners Cellco Partnership d/b/a Verizon Wireless, Verizon Corporate Services Group Inc. (“Verizon”), TMobile USA, Inc. (“TMobile”), and AT&T Services, Inc. (“AT&T”), (collectively, “Petitioners”), which license agreements resolve the disputes in the above-captioned *inter partes* review relating to U.S. Patent No. 8,924,543 (“Patent-in-Suit”). The parties jointly request that the Board treat the license agreements as business confidential information and keep them separate from the files of this proceeding and the files of the Patent-in-Suit. As set forth in an e-mail dated April 22, 2025, the Board authorized the filing of the requested Joint Motion to Terminate this *inter partes* review and the instant request to treat the license agreements as business confidential information under 37 C.F.R. § 42.74(c).

I. STATEMENT OF PRECISE RELIEF REQUESTED

The parties jointly request that the Board treat the license agreements as business confidential information and keep them separate from the files of this proceeding and the files of the Patent-in-Suit. The parties request that the license agreements “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 license agreements require the parties to treat the license agreement as confidential information and limit their ability to share the license agreements or disclose their content with third parties. The parties have filed a copy of the license agreements with the Board, as required by 35 U.S.C. § 317(b) and 37 C.F.R. § 42.74. The confidential license agreements were filed in the PTACTS system to provide availability only to the Board and the filing party.

Dated: November 28, 2025

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CERTIFICATE OF SERVICE (37 C.F.R. § 42.6(e)(1))

The undersigned hereby certifies that the above document was served on November 28, 2025, by filing this document through the PTACTS system as well as delivering a copy via electronic mail upon the following attorneys of record for the Petitioners:

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Respectfully submitted,

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