UNITED STATES PATENT AND TRADEMARK OFFICE

_____

BEFORE THE PATENT TRIAL AND APPEAL BOARD

_____

SONY CORPORATION,
Petitioner,

v.

OPTIMUM IMAGING TECHNOLOGIES, LLC,
Patent Owner.

_____

Case No. IPR2024-01046
Patent No. 10,877,266

_____

JOINT REQUEST THAT SETTLEMENT AGREEMENT BE TREATED AS BUSINESS CONFIDENTIAL INFORMATION AND KEPT SEPARATE UNDER 35 U.S.C. § 317(b) AND 37 C.F.R. § 42.74(c)

Pursuant to 35 U.S.C. § 317(b) and 37 C.F.R. § 42.74(c), Petitioner Sony Corp. and Patent Owner Optimum Imaging Technologies, LLC (collectively, the "Parties") jointly request that the Settlement Agreement (Exhibit 2054) and the Collateral Agreement (Exhibit 2055) referenced in the concurrently filed Joint Motion to Terminate be treated as business confidential information. As such, the Parties request that Exhibits 2054 and 2055 be kept separate from the files of the involved patent and IPR2024-01046, and made available only to Federal Government agencies upon written request or to any other person upon written request and a showing of good cause. The Parties further request that if any person requests access to Exhibit 2054 or Exhibit 2055, that the Parties be given notice and an opportunity to oppose the showing of good cause before the exhibit is made available to such person.

Respectfully submitted,

Date: June 3, 2025

By: */s/ Scott A. McKeown (with permission)*

Scott A. McKeown, Reg. No. 42,866
Marc S. Johannes, Reg. No. 64,978
Randy J. Pritzker, Reg. No. 35,986
WOLF, GREENFIELD & SACKS, P.C
600 Atlantic Avenue
Boston, MA 02210

Counsel for Petitioner
Sony Corporation

/s/ Thomas M. Dunham

Thomas M. Dunham, Reg. No: 39,965
Robert W. Molitors, Reg. No. 66,726
Elizabeth A. O'Brien, Reg. No. 76,105
CHERIAN LLP
2001 L Street NW, Suite 650
Washington, D.C. 20036

Counsel for Patent Owner
Optimum Imaging Technologies LLC

CERTIFICATE OF SERVICE UNDER 37 C.F.R. § 42.6 (E)(4)

I certify that on the undersigned date, a copy of the foregoing document is being served via electronic mail, as previously consented to by Petitioner, upon the following:

SMcKeown-PTAB@WolfGreenfield.com

MJohannes-PTAB@WolfGreenfield.com

RPritzker-PTAB@WolfGreenfield.com

Date: June 3, 2025

/s/ Thomas M. Dunham

Thomas M. Dunham, Reg. No: 39,965
Counsel for Patent Owner
Optimum Imaging Technologies LLC