

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

HONDA MOTOR CO., LTD.; AND
AMERICAN HONDA MOTOR CO., INC.,
Petitioner

v.
INFOGATION CORPORATION,
Patent Owner

Case No. IPR2024-01160
U.S. Patent No. 6,292,743

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

LIST OF EXHIBITS¹

Ex. No.	Description
Ex-1001	U.S. Patent No. 6,292,743 (“the ’743 Patent”)
Ex-1002	Declaration of Mr. Scott Andrews
Ex-1003	Curriculum Vitae of Mr. Scott Andrews
Ex-1004	Prosecution History of U.S. Patent No. 6,292,743
Ex-1005	U.S. Patent No. 6,680,694 (“Knockeart”)
Ex-1006	U.S. Patent No. 5,893,113 (“McGrath”)
Ex-1007	U.S. Patent No. 6,334,087 (“Nakano”)
Ex-1008	U.S. Patent No. 5,059,965 (“Geiser”)
Ex-1009	European Patent App. Pub. No. EP 0827124A2 (“Watanabe”)
Ex-1010	Japanese Patent App. Pub. No. JP H10-221091A (“Nunokawa”)
Ex-1011	Certified Translation of Nunokawa
Ex-1012	Japanese Patent App. Pub. No. JP H8-110230 (“Endo”)
Ex-1013	Certified Translation of Endo
Ex-1014	INTENTIONALLY LEFT BLANK
Ex-1015	INTENTIONALLY LEFT BLANK
Ex-1016	INTENTIONALLY LEFT BLANK
Ex-1017	INTENTIONALLY LEFT BLANK

¹ Four-digit pin citations that begin with 0 are to the page stamps added by Honda in the bottom right corner of the exhibits. All other pin citations are to original page, column, paragraph, and/or line numbers.

Ex-1018	INTENTIONALLY LEFT BLANK
Ex-1019	INTENTIONALLY LEFT BLANK
Ex-1020	Claim Mapping Table
Ex-1021	<i>InfoGation Corp. v. ZTE Corp.</i> , No. 16-cv-01901-H-JLB, D.I. 74 (S.D. Cal. May 5, 2017) (Claim Construction Order)
Ex-1022	<i>InfoGation Corp. v. Google LLC</i> , No. 21-cv-00843-H-LL, D.I. 85 (S.D. Cal. June 8, 2021) (Claim Construction Order)
Ex-1023	Infogation’s Infringement Contentions
Ex-1024	“Behind the Success of the CVCC Engine,” Honda Worldwide, https://web.archive.org/web/20070219081359/http://world.honda.com/history/challenge/1981navigationsystem/text/01.html (last visited July 15, 2024)
Ex-1025	“The Final Test: From Suzuka to Tokyo,” Honda Worldwide, https://web.archive.org/web/20070221131328/http://world.honda.com/history/challenge/1981navigationsystem/text/06.html (last visited July 15, 2024)
Ex-1026	“Creating a Progressive Strategy,” Honda Worldwide, https://web.archive.org/web/20070221131445/http://world.honda.com/history/challenge/1981navigationsystem/text/02.html (last visited July 15, 2024)
Ex-1027	Kunihiro Ishikawa, Michima Ogawa, Shigetoshi Azuma, and Tooru Ito, <i>Map Navigation Software of the Electro-Multivision of the ’91 Toyota Soarer</i> , in Proceedings of the Vehicle Navigation and Info. Sys. Conference (Oct. 1, 1991) (“Ishikawa”)
Ex-1028	U.S. Patent No. 4,502,123 to Minami et.al. (“Minami”)
Ex-1029	Robert L. French, <i>Automobile Navigation: Where is it Going?</i> , 2 IEEE Aerospace & Elec. Sys. Mag. 5, 6-12 (1987)
Ex-1030	U.S. Dep’t. of Transp., Fed. Highway Admin., TravTek Global Evaluation and Executive Summary, Pub. No. FHWA-RD-96-031

	(Mar. 1996)
Ex-1031	C. Blumentritt, K. Balke, E. Seymour, R. Sanchez, TravTek System Architecture Evaluation, Pub. No. FHWA-RD-94-141 (July 1995)
Ex-1032	Robert L. French, <i>Historical Navigation of Automobile Navigation Technology</i> , Institute of Electrical Engineers (May 1986)
Ex-1033	U.S. Patent No. 6,163,749 (“McDonough”)
Ex-1034	U.S. Patent No. 5,808,566 (“Behr”)
Ex-1035	ISO/TR 14825 Technical Report, <i>Geographic Data Files (GDF)</i> (1st ed., 1996-11-15)
Ex-1036	U.S. Provisional Pat. Appl. No. 60/056,150, filed on Aug. 19, 1997 (“Knockeart Provisional”)
Ex-1037	Chart Mapping Knockeart Provisional’s Disclosures (Ex-1036) to Knockeart (Ex-1005)
Ex-1038	Yilin Zhao, <i>Vehicle Location and Navigation Systems</i> , Artech House (1997)
Ex-1039	Honda’s Release Agreement

Patent Owner Infogation Corporation (“Infogation”) and Petitioner Honda Motor Co., Ltd. and American Honda Motor Co., Inc. (collectively, “Honda”) have reached a settlement. The release 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 release 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 August 30, 2024.

I. STATEMENT OF PRECISE RELIEF REQUESTED

The parties jointly request that the Board treat the release 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 release 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 release agreement require the parties to treat the release agreement as confidential information and limit their ability to share the release agreement or disclose its content with third parties. The parties have filed a copy of

the release agreement with the Board, as required by 35 U.S.C. § 317(b) and 37 C.F.R. § 42.74. The confidential release agreement was filed in the PTAB P-TACTS system to provide availability only to the Board.

Dated: September 4, 2024

Respectfully submitted,

/s/ Benjamin Haber

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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 September 4, 2024, by filing this document through the Patent Trial and Appeal Board P-TACTS System, as well as delivering a copy via electronic mail upon the following attorneys of record for Patent Owner:

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