

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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LENOVO (UNITED STATES) INC. and  
MOTOROLA MOBILITY LLC,  
Petitioner,

v.

HEADWATER RESEARCH LLC,  
Patent Owner

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Patent No. 10,749,700  
Case No. IPR2024-01181

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**JOINT REQUEST TO TREAT SETTLEMENT AGREEMENT AS  
BUSINESS CONFIDENTIAL INFORMATION  
PURSUANT TO 35 U.S.C. § 317(b) and 37 C.F.R. §42.74(c)**

Petitioners Lenovo (United States) Inc. and Motorola Mobility LLC (“Petitioners”) and Patent Owner Headwater Research LLC (“Headwater” or “Patent Owner”) (collectively, the “Parties”) are filing, concurrently with a Joint Motion to Terminate Proceedings, a true copy of an executed agreement resolving the Parties’ disputes and agreeing to terminate this proceeding and the parties’ related district court proceeding (Exhibit 1024).

Pursuant to 35 U.S.C. § 317(b) and 37 C.F.R. § 42.74(c), and the September 15, 2025 authorization of the Board, the parties jointly request that the agreement (Ex. 1024) be treated as business confidential information and kept separate from the public files of the involved patent (U.S. Patent No. 10,749,700) and *inter partes* review proceeding. The agreement describes the confidential terms resolving the Parties’ dispute and contains terms limiting disclosure of the agreement by the Parties. The agreement, therefore, constitutes confidential information under the Board’s rules. *See* 37 C.F.R. § 42.54. Accordingly, the Parties request that the agreement be kept separate from the public files and that disclosure by the Board and/or Office be limited according to the terms of the agreement. *See* 37 C.F.R. § 42.54(a)(7). The Parties hereby certify that, to the best of their knowledge, the documents sought to be protected have not been made publicly available and that no other parties are affected.

Date: September 16, 2025

Respectfully Submitted,

/James A. Milky/

James A. Milky

Reg. No. 79,503

Counsel for Patent Owner

/Joshua L. Goldberg/

Joshua L. Goldberg

Reg. No. 59,369

Counsel for Petitioners

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing **JOINT REQUEST TO TREAT SETTLEMENT AGREEMENT AS BUSINESS CONFIDENTIAL INFORMATION** was served on September 16, 2025, via email directed to counsel of record for the Patent Owner at the following:

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Dated: September 16, 2025

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