UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

HARTMANN US INC. and THE HAPPY GROUP INC.,

Petitioners

v.

MAURICE J.P. TABONE,

Patent Owner

IPR2024-01216
U.S. Patent No. 11,225,365

JOINT REQUEST TO TREAT SETTLEMENT AGREEMENT AS BUSINESS CONFIDENTIAL INFORMATION AND BE KEPT SEPARATE UNDER 35 U.S.C. § 317(b)

Pursuant to 35 U.S.C. § 317(b) and 37 C.F.R. § 42.74(c), Petitioners Hartmann US Inc., Brødrene Hartmann A/S, and The Happy Group Inc. (collectively, the "Petitioners") and Patent Owner Maurice J. P. Tabone ("Tabone") jointly request that the confidential Settlement Agreement between the parties regarding termination (Ex.1040) be treated as business confidential information and be kept separate from the file for this *inter partes* review (IPR) proceeding. Concurrently with the filing of this Request, Petitioners and Patent Owner are filing a Joint Motion to Terminate *Inter Partes* Review due to the settlement between the parties.

The terms of the Settlement Agreement require that the Settlement Agreement be kept confidential. The parties consider the Settlement Agreement to contain highly sensitive business confidential information that would substantially harm their business interests if publicly disclosed. As such, the parties hereby jointly request that the Settlement Agreement be kept separate from the file of the involved patent and to be made available only under the provisions of 35 U.S.C § 317(b) and 37 C.F.R. § 42.74(c).

Respectfully submitted,

Date: October 14, 2024

/Eugene Goryunov/
Eugene Goryunov
Counsel for Petitioners
Registration No. 61,579

/Maurice J P Tabone/
Maurice Joseph Paul Tabone
Pro Se Patent Owner

CERTIFICATE OF SERVICE

The undersigned certifies, under 37 C.F.R. § 42.6, that service was made on the Patent Owner as detailed below.

Date of service	October 14, 2024
Manner of service	Electronic Service: mauricetabone@gmail.com
Documents served	**Joint Motion to Terminate *Inter Partes* Review; Joint Request to Treat Settlement Agreement as Business Confidential Information and Be Kept Separate; Exhibits 1040 and 1041**
Persons served	Maurice J. P. Tabone 33 Stockton Avenue Moorebank, NSW, 2170 Australia

/Eugene Goryunov/
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