

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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SAMSUNG ELECTRONICS CO. LTD,  
Petitioner,

v.

HEADWATER RESEARCH LLC,  
Patent Owner.

IPR2024-01337  
Patent 8,588,110

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

**PATENT OWNER'S EXHIBIT LIST**

| No.      | Description                                                                                                                                                                                                                                                                                                                            |
|----------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Ex. 2001 | Declaration of Dr. Michael C. Brogioli in Support of Patent Owner's Response                                                                                                                                                                                                                                                           |
| Ex. 2002 | <i>Curriculum Vitae</i> of Dr. Brogioli                                                                                                                                                                                                                                                                                                |
| Ex. 2003 | June 6, 2025 Deposition Transcript of Dr. Patrick McDaniel                                                                                                                                                                                                                                                                             |
| Ex. 2004 | Sun Microsystems, System Administration Guide: IP Services (2009), available at <a href="https://docs.oracle.com/cd/E19120-01/open.solaris/819-3000/819-3000.pdf">https://docs.oracle.com/cd/E19120-01/open.solaris/819-3000/819-3000.pdf</a>                                                                                          |
| Ex. 2005 | Application Layer, <a href="https://en.wikipedia.org/wiki/Application_layer">https://en.wikipedia.org/wiki/Application_layer</a> (last visited June 20, 2025)                                                                                                                                                                          |
| Ex. 2006 | Real-time Transport Protocol, <a href="https://en.wikipedia.org/wiki/Real-time_Transport_Protocol">https://en.wikipedia.org/wiki/Real-time_Transport_Protocol</a> (last visited June 20, 2025)                                                                                                                                         |
| Ex. 2007 | Windows Server, <i>Understanding the Remote Desktop Protocol (RDP)</i> (Jan. 1, 2025) available at <a href="https://learn.microsoft.com/en-us/troubleshoot/windows-server/remote/understanding-remote-desktop-protocol">https://learn.microsoft.com/en-us/troubleshoot/windows-server/remote/understanding-remote-desktop-protocol</a> |
| Ex. 2008 | Independent Computing Architecture, <a href="https://en.wikipedia.org/wiki/Independent_Computing_Architecture">https://en.wikipedia.org/wiki/Independent_Computing_Architecture</a> (last visited June 20, 2025)                                                                                                                       |
| Ex. 2009 | Data Link Layer, <a href="https://en.wikipedia.org/wiki/Data_link_layer">https://en.wikipedia.org/wiki/Data_link_layer</a> (last visited June 20, 2025)                                                                                                                                                                                |
| Ex. 2010 | Confidential Settlement Agreement (complete)                                                                                                                                                                                                                                                                                           |

As set forth in the parties' Joint Motion to Terminate (Paper No. 17), Patent Owner has entered into a settlement agreement with respect to Samsung. An inadvertently partial version of that agreement was provided as Exhibit 1052. Pursuant to an email to the parties to file the complete agreement (Ex. 3101), the parties hereby submit the complete agreement as Ex. 2010, which is a complete copy of all agreements between Petitioner and Patent Owner which resolve the disputes between the parties with respect to U.S. Patent No. 8,588,110 ("Patent-in-Suit") and this *inter partes* review challenging the Patent-in-Suit. The parties jointly request that the Board treat the settlement agreement as business confidential information and keep it separate from the files of this proceeding and the files of the Patent-in-Suit.

#### **I. STATEMENT OF PRECISE RELIEF REQUESTED**

The parties jointly request that the Board treat the settlement 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 settlement 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 settlement agreement requires the parties to treat the settlement agreement as confidential information and limit their ability to share the settlement agreement or disclose their content with third parties. The parties have filed a copy of the settlement agreement with the Board, as required by 35 U.S.C. § 317(b) and 37 C.F.R. § 42.74. The confidential settlement agreement was filed in the PTACTS system to provide availability only to the Board and the filing party.

Dated: December 1, 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 December 1, 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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