UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

FUJIFILM CORPORATION, FUJIFILM NORTH AMERICA CORPORATION, NIKON CORPORATION, PANASONIC ENTERTAINMENT & COMMUNICATION CO., LTD., OLYMPUS CORPORATION, OM DIGITAL SOLUTIONS CORPORATION,

Petitioners

v.

OPTIMUM IMAGING TECHNOLOGIES LLC,

Patent Owner

Case IPR2024-01374

Patent No. 10,877,266

JOINT MOTION TO FILE AGREEMENTS AS BUSINESS CONFIDENTIAL INFORMATION AND KEEP SEPARATE FROM THE PATENT FILES[1]

Mail Stop PATENT BOARD
Patent Trial and Appeal Board
United States Patent and Trademark Office
P.O. Box 1450
Alexandria, VA 22313-1450

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[1] This Joint Motion was authorized by the Board in an e-mail dated 6/3/2025.

PATENT OWNER'S LIST OF EXHIBITS	
EX. 2001	Claim Construction Memorandum Opinion and Order, *Optimum Imaging Technologies LLC v. Canon Inc.,* No. 2:19-cv-00246-JRG, Dkt. 88 (E.D. Tex. June 11, 2020)
EX. 2002	Order granting Joint Motion to Modify Scheduling Order, *Optimum Imaging Technologies LLC v. Fujfilm Corp*., No. 4:23cv-00922, Dkt. 61 (E.D. Tex. Feb. 14, 2025)
EX. 2003	Order, *Panasonic Entertainment & Communication Co., Ltd. v. Optimum Imaging Technologies LLC,* No. 3:24-cv-02466, Dkt. 47 (N.D. Cal. Sep. 23, 2024)
EX. 2004	Docket Report, *Optimum Imaging Technologies LLC v. Panasonic Corp. et al.,* No. 4:23-cv-00926, (E.D. Tex.) as of March 19, 2025
EX. 2005	Letter from Texas Secretary of State, *Optimum Imaging Technologies LLC v. Fujifilm Corp.,* No. 4-23-cv-00922-ALM, Dkt. 14 (E.D. Tex. Feb. 20, 2024)
EX. 2006	Mediator's Report, *Optimum Imaging Technologies LLC v. Olympus Corporation, et al.,* No. 4:23-cv-00924-ALM, Dkt. 71 (E.D. Tex. March 10, 2025)
EX. 2007	Joint Notice of Settlement, *Optimum Imaging Technologies LLC v. Fujifilm Corporation,* No. 4:23-cv-00922-ALM, Dkt. 70 (E.D. Tex. March 19, 2025)
EX. 2008	Printout of Website titled "Founding of Olympus" accessed at https://www.olympus-global.com/company/milestones/founding.html on March 7, 2025
EX. 2009	Printout of Website titled "History [of Fujifilm Corporation]" accessed at https://www.fujifilm.com/us/en/about/hq/corporate/history on March 18, 2025

EX. 2010	Joint Motion to Stay All Deadlines for Two Weeks, *Optimum Imaging Technologies LLC v. Nikon Corporation,* No. 4:23-cv-00923-ALM, Dkt. 73 (E.D. Tex. April 1, 2025)
EX. 2011	RESERVED
EX. 2012	RESERVED
EX. 2013	RESERVED
EX. 2014	RESERVED
EX. 2015	RESERVED
EX. 2016	Joint Notice of Settlement, *Optimum Imaging Technologies LLC v. Nikon Corporation*, No. 4:23-cv-00923-ALM, Dkt. 79 (E.D. Tex. April 11, 2025)
EX. 2017	Joint Notice of Settlement, *Optimum Imaging Technologies LLC v. Olympus Corporation, et al.*, No. 4:23-cv-00924-ALM, Dkt. 72 (E.D. Tex. March 10, 2025)
EX. 2018	Joint Notice of Settlement, *Optimum Imaging Technologies LLC v. Panasonic Corporation, et al.*, No. 4:23-cv-00926-ALM, Dkt. 41 (E.D. Tex. April 11, 2025)
EX. 2019	Settlement Agreement - Olympus (Board Only)
EX. 2020	Settlement Agreement – Fujifilm (Board Only)
EX. 2021	Settlement Agreement – Nikon (Board Only)
EX. 2022	Settlement Agreement – Panasonic (Board Only)
EX. 2023	Collateral Agreement (Board Only)

Patent Owner Optimum Imaging Technologies LLC and Petitioners Olympus Corporation, OM Digital Solutions Corporation, Fujifilm Corporation, Fujifilm North America Corporation, Nikon Corporation, Panasonic Entertainment & Communication Co., Ltd. (collectively, "the Parties") have settled their disputes. Pursuant to 35 U.S.C. § 317 and 37 C.F.R. § 42.74, the Parties jointly request that the Board treat EXS. 2019-2023 as business confidential information and keep EXS. 2019-2023 separate from the patent files.

EXS. 2019-2023 are concurrently filed as "Board Only." EXS. 2019-2023 contain highly sensitive business confidential information that would substantially harm the Parties' business interests if publicly disclosed. There are also terms in the agreements that require confidential treatment and limit public disclosure, including disclosure to the other petitioners in this proceeding. As such, the Parties jointly request that EXS. 2019-2023 be treated as confidential business information and kept separate from the patent files.[2]

For at least the foregoing reasons, the Parties respectfully request that EXS. 2019-2023 be treated as business confidential information and kept separate from the patent files.

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[2] Petitioners join this request based on representations made by Patent Owner regarding EX. 2023.

Respectfully submitted,

Date: June 3, 2025

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CERTIFICATE OF COMPLIANCE

This paper complies with the type-volume and general format requirements under 37 C.F.R. §§ 42.24(a)(1)(v) and 42.6(a).

Respectfully submitted,

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CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6(e), the undersigned hereby certifies that this paper was served on the undersigned date via email, as authorized by Petitioners, at the following email addresses:

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