UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

GOOGLE LLC and
LENOVO (UNITED STATES) INC.,
Petitioners,

v.

ERICSSON AB,
Patent Owner.

Case IPR2025-00004
Patent No. 11,122,313

JOINT REQUEST TO TREAT LENOVO SETTLEMENT AGREEMENT AND LENOVO ARBITRATION AGREEMENT AS BUSINESS CONFIDENTIAL INFORMATION

EXHIBIT LIST

LIST OF NEWLY FILED EXHIBITS

The following exhibits are being filed with this Joint Motion to Terminate Co-Petitioner Lenovo (United States) Inc. Only and concurrent Joint Request to Treat the Lenovo Settlement Agreement and the Lenovo Arbitration Agreement as Business Confidential Information:

Exhibit No.	Description
2002	Confidential Settlement And Patent License Agreement ("Lenovo Settlement Agreement")
2003	Confidential Arbitration Agreement ("Lenovo Arbitration Agreement")

LIST OF PREVIOUSLY FILED EXHIBITS

Exhibit No.	Description
2001	Declaration of Kayvan B. Noroozi in Support of Motion for Admission *Pro Hac Vice*

Co-Petitioner Lenovo (United States), Inc. ("Lenovo") and Patent Owner Ericsson AB ("Ericsson") (collectively "the Settled Parties") jointly request that the Lenovo Settlement Agreement and the Lenovo Arbitration Agreement filed as Confidential Exhibits 2002 and 2003 be treated as business confidential information, be kept separate from the publicly available files of the involved patent, and not be made available to Petitioners Lenovo and Google or their counsel in this proceeding.

Section 317(b) provides that:

> At the request of a party to the proceeding, the agreement or understanding shall be treated as business confidential information, shall be kept separate from the file of the involved patents, and shall be made available only to Federal Government agencies on written request, or to any person on a showing of good cause.

Likewise, 37 C.F.R. § 42.74(c) provides that:

> A party to a settlement may request that the settlement be treated as business confidential information and be kept separate from the files of an involved patent or application. The request must be filed with the settlement. If a timely request is filed, the settlement shall only be available:
>
> (1) To a Government agency on written request to the Board; or
>
> (2) To any other person upon written request to the Board to make the settlement agreement available, along with the fee specified in § 42.15(d) and on a showing of good cause.

The present request, which is being filed along with the Lenovo Settlement Agreement and the Lenovo Arbitration Agreement, is timely and in accordance with

the foregoing authority.

Therefore, the Settled Parties respectfully submit that this request for confidential treatment should be granted.

Respectfully submitted,

Date: April 23, 2025

/Anant K. Saraswat/

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Date: April 23, 2025

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CERTIFICATION OF SERVICE

The undersigned hereby certifies that the foregoing **JOINT MOTION TO TREAT LENOVO SETTLEMENT AGREEMENT AND LENOVO ARBITRATION AGREEMENT AS BUSINESS CONFIDENTIAL INFORMATION** was served electronically via e-mail on April 23, 2025, on the following counsel of record for Petitioner:

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Date: April 23, 2025