

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

LIBERTY MUTUAL INSURANCE COMPANY, LIBERTY MUTUAL
TECHNOLOGY GROUP, INC., LIBERTY MUTUAL HOLDING COMPANY
INC., LIBERTY MUTUAL GROUP INC., LIBERTY MUTUAL PLANO LLC,
COMPARION INSURANCE AGENCY, LLC, IRONSHORE HOLDINGS (U.S.)
INC.,

and

COMERICA INCORPORATED
Petitioners,

v.

INTELLECTUAL VENTURES II LLC
Patent Owner.

Case No. IPR2025-00202
U.S. Patent No. 8,332,844

**PETITIONER'S AND PATENT OWNER'S JOINT REQUEST TO FILE
RESOLUTION DOCUMENTS AS BUSINESS CONFIDENTIAL
INFORMATION PURSUANT TO 35 U.S.C. § 317(b)**

Pursuant to 35 U.S.C. § 317(b) and 37 C.F.R. § 42.74(c), Petitioner Liberty Mutual Insurance Company, Liberty Mutual Technology Group, Inc., Liberty Mutual Holding Company Inc., Liberty Mutual Group Inc., Liberty Mutual Plano LLC, Comparion Insurance Agency, LLC, Ironshore Holdings (U.S.) Inc., and Comerica Incorporated (“Petitioner”) and Patent Owner Intellectual Ventures II LLC (“Patent Owner”) jointly request to file and treat the document resolving the proceeding (the “Resolution Documents,” Exhibit 2001 and Exhibit 2002), as referenced in the Joint Motion to Terminate Proceedings Pursuant to 35 U.S.C. § 317, as business confidential information. The Parties further jointly request that the confidential Resolution Documents be kept separate from the file of the subject patent in the captioned proceeding and be made available only to Federal Government agencies on written request or to persons showing good cause. *See* 35 U.S.C. § 317(b); 37 C.F.R. § 42.74(c). The Board authorized the filing of this request on January 28, 2025.

The parties consider the Resolution Documents to contain highly sensitive business confidential information that would substantially harm their business interests if publicly disclosed. The parties have agreed not to publicly disclose the terms of the Resolution Documents. As such, the parties hereby jointly request that the Resolution Documents be kept as a separate paper to be made available only under the provisions of 35 U.S.C § 317(b) and 37 C.F.R. § 42.74(c). The Resolution

Documents has been filed for access by the “**Board Only**,” and the parties jointly request that the Resolution Documents remain available for the “**Board Only**.” The parties further jointly request that the Board order that in the event a person or entity makes a written request, as stated in 37 C.F.R. § 42.74(c)(1)-(2), for access to the Resolution Documents, that any such written request be served upon the parties on the day the written request is provided to the Board.

Patent Owner’s Exhibit List is appended as Appendix A to this document.

Respectfully submitted,

Dated: April 18, 2025

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Counsel for Patent Owner

Dated: April 18, 2025

By: / Joshua D. Curry/
Joshua D. Curry
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APPENDIX A
PATENT OWNER'S EXHIBIT LIST

Exhibit	Description
2001	Resolution Documents (CONFIDENTIAL)
2002	Resolution Documents (CONFIDENTIAL)

CERTIFICATE OF SERVICE

The undersigned certifies that pursuant to 37 C.F.R. § 42.6(e), a copy of the foregoing **JOINT REQUEST TO FILE RESOLUTION DOCUMENTS AS BUSINESS CONFIDENTIAL INFORMATIONS** was served via email (as consented to by counsel) on **April 18, 2025** to lead and backup counsel of record for Petitioner as follows:

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