

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

C.R. Bard, Inc.,
Petitioner,

v.

Medline Industries, LP,
Patent Owner.

IPR2025-00401
Patent 11,661,219

**JOINT REQUEST THAT THE SETTLEMENT AGREEMENT BE
TREATED AS BUSINESS CONFIDENTIAL INFORMATION AND BE
KEPT SEPARATE PURSUANT TO 35 U.S.C. § 317(b) AND 37 C.F.R.
§ 42.74(c)**

LIST OF EXHIBITS

Ex.	Description	Document Name
1001	U.S. Patent No. 11,661,219	'219 patent
1002	Declaration of Karl Leinsing	Leinsing Decl.
1003	Declaration of Dr. Edward Yun	Yun Decl.
1004	Prosecution History of 11,661,219	'219 Prosecution History
1005	U.S. Patent No. 7,278,987 to Solazzo	Solazzo
1006	Japanese Patent Application Publication No. 2006-131284 to Numata et al	Numata-JP
1007	Certified English Translation of Japanese Patent Application Publication No. 2006-131284 to Numata et al	Numata
1008	U.S. Patent No. 3,166,189 to Disston	Disston
1009	U.S. Patent No. 3,329,261 to Serany, Jr. et al.	Serany
1010	U.S. Patent No. 4,226,328 to Beddow	Beddow
1011	Japanese Patent No. 2007-229520 to Imai et al.	Imai- JP
1012	Certified English Translation of Japanese Patent No. 2007-229520 to Imai et al.	Imai
1013	U.S. Patent No. 5,931,303 to Salvadori	Salvadori
1014	Final Written Decision on Remand (Paper 102), IPR2019-00035 (November 23, 2022) ('088 Patent)	IPR2019-00035 Remand Decision

Ex.	Description	Document Name
1015	Final Written Decision on Remand (Paper 102), IPR2019-00036 (November 23, 2022) ('088 Patent)	IPR2019-00036 Remand Decision
1016	Final Written Decision on Remand (Paper 87), IPR2019-00223 (November 23, 2022) ('596 Patent)	IPR2019-00223 Remand Decision
1017	Inter Partes Review Certificate for '088 Patent	'088 IPR Certificate
1018	Inter Partes Review Certificate for '596 Patent	'596 IPR Certificate
1019	Madeo, M. and Roodhouse, A.J., Reducing the risks associated with urinary catheters, Nursing Standard, Vol. 23, No. 29, 47-55 (2009)	Nursing Standard
1020	Male Catheter Insertion Video, uploaded to YouTube on February 7, 2008, available at https://www.youtube.com/watch?v=ISBAya_5cIM	<i>Catheterization Video</i>
1021	U.S. Patent No. 4,160,505 to Rauschenberger	Rauschenberger
1022	Institution Decision (Paper 9), IPR2015-00513 (July 15, 2015)	IPR2015-00513 Institution Decision
1023	Final Written Decision (Paper 57) IPR2019-00208 (June 3, 2020)	IPR2019-00208 Decision
1024	Medline Urologicals Better By Design Brochure (2008)	Medline Brochure
1025	Norman, Donald A., The Design of Everyday Things, 2002 ed. (Excerpt)	Design of Everyday Things
1026	Initial Final Written Decision (Paper 73) (IPR2019-00035)	Initial FWD (IPR2019-00035)
1027	Guide to the Elimination of	CAUTI Guide

Ex.	Description	Document Name
	Catheter-Associated Urinary Tract Infections (CAUTIs): Developing and Applying Facility-Based Prevention Interventions in Acute and Long-Term Care Settings, Association for Professionals in Infection Control and Epidemiology (2008)	
1028	U.S. Patent No. 6,158,437 to Vagley	Vagley
1029	U.S. Patent No. 7,967,137 to Fulbrook	Fulbrook
1030 NEW	Confidential Settlement Agreement Between Parties [FILED UNDER SEAL]	Confidential Settlement Agreement Between Parties (Sealed)

Pursuant to 35 U.S.C. § 317(b) and 37 C.F.R. § 42.74(c), Patent Owner Medline Industries, LP and Petitioner C.R. Bard, Inc. (collectively, the “Parties”) jointly request to file the Settlement Agreement (Ex. 1030) between the parties, as referenced in the Parties’ Joint Motion to Terminate *Inter Partes* Review, as business confidential information, which shall be kept separate from the file of the patent at issue, and only made available to Federal Government agencies upon request.

The requested relief is appropriate because the terms of the Settlement Agreement are confidential business information and require the Parties to treat the Settlement Agreement as confidential information and limit their respective abilities to share the Settlement Agreement with or disclose its contents to third parties. Patent Owner has filed a copy of the Settlement Agreement (Ex. 1030) with the Board, as required by 35 U.S.C. § 317(b) and 37 C.F.R. § 42.74(c). The confidential Settlement Agreement was filed in the PTAB P-TACTS system to provide availability to only the Board.

Respectfully submitted,

Dated: March 26, 2025

By: /Matthew A. Traupman/

Matthew A. Traupman (Reg. No. 50,832)
matthewtraupman@quinnemanuel.com
QUINN EMANUEL URQUHART
& SULLIVAN, LLP
295 Fifth Avenue
New York, NY 10016
General Tel: (212) 849-7000
Fax: (212) 849-7100

*Counsel for Petitioner
C.R. Bard, Inc.*

Respectfully submitted,

Dated: March 26, 2025

By: /Gregory K. Sobolski/

Gregory K. Sobolski (Reg. No. 72732)
greg.sobolski@lw.com
Latham & Watkins LLP
505 Montgomery St #2000
San Francisco, CA 94111
Telephone: 415.391.0600
Fax: 415.395.8095

*Counsel for Patent Owner
Medline Industries, LP*

CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6(e), I certify that on this 26th day of March, 2025, a true and correct copy of the foregoing **Joint Request That the Settlement Agreement be Treated as Business Confidential Information and be Kept Separate Pursuant to 35 U.S.C. § 317(b) and 37 C.F.R. § 42.74(c)** was served by electronic mail on Patent Owner's lead and backup counsel at the following email addresses:

Raghav Bajaj (Reg. No. 66,630)
raghav.bajaj@lw.com
Latham & Watkins LLP
300 Colorado St., Suite 2400
Austin, TX 78701
Telephone: 737.910.7370
Fax: 737.910.7301

Gregory K. Sobolski (Reg. No. 72,732)
greg.sobolski@lw.com
Latham & Watkins LLP
505 Montgomery Street, Ste. 2000
San Francisco, CA 94111-6538
Telephone: 415.395.8035
Fax: 415.395.8095

Marc N. Zubick (*pro hac vice* motion to be filed)
marc.zubick@lw.com
Latham & Watkins LLP
330 North Wabash Avenue, Suite 2800
Chicago, IL 60611
Telephone: 312.876.7606
Fax: 312.993.9767

By: /Matthew A. Traupman/

Matthew A. Traupman (Reg. No. 50,832)
matthewtraupman@quinnemanuel.com
QUINN EMANUEL URQUHART
& SULLIVAN, LLP
295 Fifth Avenue
New York, NY 10016
General Tel: (212) 849-7000
Fax: (212) 849-7100

Counsel for Petitioner
C.R. Bard, Inc.