UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

ZHUHAI COSMX BATTERY CO., LTD.,
Petitioner

v.

NINGDE AMPEREX TECHNOLOGY LIMITED,
Patent Owner

Case IPR2025-00431
U.S. Patent No. 11,799,131

JOINT REQUEST TO KEEP AGREEMENT BUSINESS CONFIDENTIAL AND SEPARATE UNDER 37 C.F.R. § 42.74(c)

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

Zhuhai CosMX Battery Co., Ltd. ("Petitioner") and Ningde Amperex Technology Limited ("Patent Owner") (collectively, "the parties") are filing, concurrently with a Joint Motion to Terminate *Inter Partes* Review, a true copy of an executed settlement agreement (EX1100) that resolves all underlying disputes between Petitioner and Patent Owner with respect to U.S. Patent No. 11,799,131. Pursuant to 35 U.S.C. § 317(b) and 37 C.F.R. § 42.74(c), the parties hereby jointly request that the settlement agreement be treated as business confidential information and be kept separate from the file of this *inter partes* review (IPR) proceeding. The Board authorized the parties to file this joint request in an email of June 11, 2026.

The parties consider the settlement agreement to contain highly sensitive confidential business information that would substantially harm their business interests if publicly disclosed. As such, the parties hereby jointly request that the settlement agreement 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 parties hereby certify that, to the best of their knowledge, the document sought to be protected has not been made publicly available. The settlement agreement has been filed for access by the "Board and Parties Only."

Respectfully submitted,

STERNE, KESSLER, GOLDSTEIN & FOX PLLC

/Jason A. Fitzsimmons/

Jason A. Fitzsimmons
Registration No. 65,367
Counsel for Petitioner

Date: June 15, 2026

1101 K Street, NW, 10th Floor
Washington, DC 20005
(202) 371-2600

ALSTON & BIRD LLP

/Christopher TL Douglas/

Christopher TL Douglas
Registration No. 56,950
Counsel for Patent Owner

Date: June 15, 2026

1120 South Tryon Street, Suite 300
Charlotte, NC 28208
(704) 444-1000

CERTIFICATE OF SERVICE (37 C.F.R. § 42.6(e)(1))

The undersigned certifies that a true and correct copy of the foregoing **JOINT REQUEST TO KEEP AGREEMENT BUSINESS CONFIDENTIAL AND SEPARATE UNDER 37 C.F.R. § 42.74(c)** was served in its entirety electronically via e-mail on June 15, 2026, on the following counsel of record for Patent Owner:

Christopher TL Douglas (Lead Counsel) christopher.douglas@alston.com
Madeline Byrd (Back-up Counsel) maddy.byrd@alston.com
Miranda Sooter (Back-up Counsel) miranda.sooter@alston.com
Casey Hickey (Back-up Counsel) casey.hickey@alston.com
Brady Cox (Back-up Counsel) brady.cox@alston.com
ATL-CosMXIPRs@alston.com
ALSTON & BIRD LLP

Respectfully submitted,

STERNE, KESSLER, GOLDSTEIN & FOX PLLC

/Jason A. Fitzsimmons/

Jason A. Fitzsimmons
Registration No. 65,367
Counsel for Petitioner

Date: June 15, 2026

1101 K Street, NW, 10th Floor
Washington, DC 20005
(202) 371-2600

27130207.DOCX