

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAMSUNG ELECTRONICS CO., LTD. AND
SAMSUNG ELECTRONICS AMERICA, INC.,

Petitioners

v.

OPTIMUM IMAGING TECHNOLOGIES LLC,

Patent Owner

Case IPR2025-00463

Patent No. 10,877,266

**JOINT MOTION TO FILE AGREEMENTS AS BUSINESS
CONFIDENTIAL INFORMATION AND
KEEP SEPARATE FROM THE PATENT FILES¹**

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

¹ This Joint Motion was authorized by the Board in an e-mail dated 5/23/25.

<u>PATENT OWNER'S LIST OF EXHIBITS</u>	
EX. 2001	Redacted Transcript, <i>Optimum Imaging Technologies LLC v. Nikon Corporation</i> , No. 4:23-cv-00923-ALM, Dkt. 84 (E.D. Tex. April 29, 2025)
EX. 2002	Joint Notice of Settlement and Request to Stay All Deadlines, <i>Optimum Imaging Technologies LLC v. Samsung Electronics Co., Ltd., et al.</i> , No. 4:23-cv-00927-ALM, Dkt. 114 (E.D. Tex. April 15, 2025)
EX. 2003	Amended Scheduling Order, <i>Optimum Imaging Technologies LLC v. Samsung Electronics Co., Ltd., et al.</i> , No. 4:23-cv-00927-ALM, Dkt. 78 (E.D. Tex. Feb. 14, 2025)
EX. 2004	Order granting Joint Motion to Dismiss, <i>Optimum Imaging Technologies LLC v. Fujifilm Corporation</i> , No. 4:23-cv-00922-ALM, Dkt. 75 (E.D. Tex. May 10, 2025)
EX. 2005	Joint Motion to Dismiss, <i>Optimum Imaging Technologies LLC v. Olympus Corporation, et al.</i> , No. 4:23-cv-00924-ALM, Dkt. 75 (E.D. Tex. April 25, 2025)
EX. 2006	Settlement Agreement (Board and Parties Only)
EX. 2007	Collateral Agreement (Board Only)

Patent Owner Optimum Imaging Technologies LLC and Petitioner Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. (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. 2006-2007 as business confidential information and keep EXS. 2006-2007 separate from the patent files.

EX. 2006 is concurrently filed as “Board and Parties Only” and EX. 2007 is concurrently filed as “Board Only.” EXS. 2006-2007 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. As such, the Parties jointly request that EXS. 2006-2007 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. 2006-2007 be treated as business confidential information and kept separate from the patent files.

² Petitioner joins this request based on representations made by Patent Owner regarding EX. 2007.

Respectfully submitted on May 23, 2025,

By: /s/ Thomas M. Dunham

Thomas M. Dunham

Reg. No. 39,965

Cherian LLP

2001 L Street NW, Suite 650

Washington, D.C. 20036

(202) 838-1567

ATTORNEY FOR PATENT OWNER

By: /s/ Andrew R. Sommer (with
permission)

Andrew R. Sommer

Reg. No. 53,932

Greenberg Traurig, LLP

1750 Tysons Boulevard, Suite 1000

McLean, VA 22102

(703) 749-1370

ATTORNEY FOR PETITIONER

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,

Date: May 23, 2025

By: /s/ Thomas M. Dunham

Thomas M. Dunham

Reg. No. 39,965

Cherian LLP

2001 L Street NW, Suite 650

Washington, D.C. 20036

(202) 838-1567

ATTORNEY FOR PATENT OWNER,
OPTIMUM IMAGING TECHNOLOGIES
LLC

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:

Samsung-OIT-IPRs@gtlaw.com

SommerA@gtlaw.com

BriggsH@gtlaw.com

Trenton.Ward@gtlaw.com

PrewB@gtlaw.com

Katie.Albanese@gtlaw.com

Respectfully submitted,

Date: May 23, 2025

By: /s/ Thomas M. Dunham

Thomas M. Dunham

Reg. No. 39,965

Cherian LLP

2001 L Street NW, Suite 650

Washington, D.C. 20036

(202) 838-1567

ATTORNEY FOR PATENT OWNER,
OPTIMUM IMAGING TECHNOLOGIES
LLC