

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

Henri Daussi, LLC,
Petitioner,

v.

ECNA, LLC,
Patent Owner.

IPR2025-00807
U.S. Patent No. 9,398,791

**JOINT REQUEST TO TREAT SETTLEMENT AGREEMENT AS
BUSINESS CONFIDENTIAL INFORMATION PURSUANT TO 35 U.S.C. §
317(B) AND 37 C.F.R. § 42.74(C)**

Pursuant to 35 U.S.C. § 317(b) and 37 C.F.R. § 42.74(c), Petitioner Henri Daussi, LLC (“Petitioner”) and ECNA, LLC (“Patent Owner”) (collectively, the “Parties”) jointly request that Exhibit 1014 (a true copy of the written settlement agreement between the Parties filed on November 20, 2025) be treated as business confidential information, which shall be kept separate from the file of the involved patent and that of the above-referenced *Inter Partes* Review. The settlement agreement describes confidential terms that resolve Parties’ dispute, and the terms of the settlement agreement require that they be kept confidential. The Parties file this request in response to the Board’s comment in its Termination Decision at p. 3 that “Exhibit 1014 *will be made public in due course unless the parties promptly file a request to keep separate pursuant to 36 C.F.R. § 42.74(c).*”

Accordingly, the Parties jointly request that the settlement agreement be made available only to (i) Federal Government agencies upon a written request or (ii) any other person upon a written request thereby and upon a showing of good cause. Given the highly sensitive nature of the above-referenced settlement agreement between the Parties, should a third party submit a written request to the Board for a copy of the settlement agreement, the Parties respectfully request a notification of the request and an opportunity to respond and object thereto. In view of this request, the above-referenced settlement

agreement has been filed with the Board for this *Inter Parties* Review for access by the “Parties and Board Only.”

The Parties respectfully request that the Board grant this joint motion to treat the settlement agreement (Exhibit 1014) as business confidential information.

Dated: December 15, 2025

Respectfully Submitted,

/Gary Abelev/

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Dated: December 15, 2025

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Counsel for Patent Owner

ECNA, LLC

CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6(e)(4), lead counsel for Petitioner hereby certifies that on December 15, 2025, a copy of this JOINT REQUEST TO TREAT SETTLEMENT AGREEMENT AS BUSINESS CONFIDENTIAL INFORMATION PURSUANT TO 35 U.S.C. § 317(b) AND 37 C.F.R. § 42.74(c) was provided by email to the Patent Owner's counsel of record.

Dated: December 15, 2025

Respectfully Submitted,

/Gary Abelev/

Gary Abelev

HUNTON ANDREWS KURTH LLP