

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SOLVENTUM CORPORATION,

PETITIONER

v.

WOUND HEALING TECHNOLOGIES, CORP.

PATENT OWNER

IPR2025-01042
Patent 10,639,404

**JOINT MOTION TO KEEP CONFIDENTIAL AND SEPARATE UNDER 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 Solventum Corporation and Patent Owner Wound Healing Technologies, LLC (together, the “Parties”) jointly request that the settlement agreement between the Parties, filed concurrently as Exhibit 1042, be treated as business confidential information, and be kept separate from the publicly available file of the involved patent. Concurrently with this request, the Parties are filing a joint motion to terminate this *inter partes* review.

The Parties consider the settlement agreement to contain highly sensitive business confidential information that would substantially harm their business interests if publicly disclosed, as it lays out confidential commercial terms agreed to by the Parties in settling their differences regarding the challenged patent. *See* 37 C.F.R. § 42.2 (“Confidential information means trade secret or other confidential research, development, or commercial information.”). Accordingly, Exhibit 1042 has been filed for access by the “Parties and Board Only.” As required by 37 C.F.R. § 42.74(b), Exhibit 1042 is the entire agreement or understanding between the Parties made in connection with, or in contemplation of, the termination of this proceeding, and is a true and accurate copy of the agreement between the Parties that resolves the present proceeding.

Dated: June 25, 2026

Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of this Joint Motion to Keep Confidential and Separate Under 35 U.S.C. § 317(b) and 37 C.F.R. § 42.74(c) was served on counsel of record on June 25, 2026, by filing this document through the Patent Trial and Appeal Case Tracking System (P-TACTS) as well as delivering a copy via electronic mail to the counsel of record for the Patent Owner at the following addresses:

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