

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

Starbucks Corporation

Petitioner

v.

PI-DESIGN AG

Patent Owner

IPR2025-01178

U.S. Patent No. 8,695,486

**JOINT REQUEST THAT SETTLEMENT AGREEMENT BE TREATED AS
BUSINESS CONFIDENTIAL INFORMATION AND KEPT SEPARATE
PURSUANT TO 35 U.S.C. § 317(b) and 37 C.F.R. § 42.72(c)**

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

Petitioner Starbucks Corp. and Patent Owner Pi-Design AG (collectively, the “Parties”) have reached a settlement agreement with respect to U.S. Patent No. 8,695,486 (the “486 Patent”), including regarding IPR2025-01178.

Pursuant to 37 C.F.R. § 42.74(b), any agreement or understanding between the parties made in connection with, or in contemplation of, the termination of a proceeding shall be in writing and a true copy shall be filed with the Board before the termination of the trial. Accordingly, the Parties have filed the Settlement Agreement herewith as Exhibit 1028. Pursuant to 35 U.S.C. § 317(b) and 37 C.F.R. § 42.74(c), Petitioner and Patent Owner jointly request to file their Settlement Agreement, including the entirety of Exhibit 1028 to the Joint Motion to Terminate Proceeding, as business confidential information, and that it be kept separate from the file of the ‘486 Patent and will only be available to a Government agency on written request to the Board or to any other person upon written request to the Board on a showing of good cause.

The terms of the Settlement Agreement require the Parties to treat the Settlement Agreement (EX1028) as confidential information and limit the Parties’ ability to share the Settlement Agreement, or to disclose its contents with third parties. *See*, Exhibit 1028. Moreover, the Settlement Agreement does not contain any information material to patentability. As such, the Parties respectfully request

that the Board treat Exhibit 1028 as business confidential information pursuant to 35 U.S.C. § 317(b) and 37 C.F.R. § 42.74(c).

Dated: December 5, 2025

/Thomas J. Campbell Jr./

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Dated: December 5, 2025

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CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing document was served on December 5, 2025 by filing this document through the Patent Trial and Appeal Case Tracking System (P-TACTS) as well as delivering a copy via electronic mail upon lead counsel (John G. Bisbikis, jbisbikis@prospectlaw.com) and backup counsel (Nathan Cummins, nathan@cummingsip.com) identified in Patent Owner's Mandatory Notices (Paper No. 4).

Date: December 5, 2025

By: /Thomas J. Campbell Jr./

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