UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

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

Petitioners,

V.

HANNIBAL IP LLC,

Patent Owner.

Case IPR2025-01189
Patent No. 11,368,911 B2

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), and the Board's email of April 10, 2026, Petitioners Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. ("Petitioners" or "Samsung") and Patent Owner Hannibal IP LLC ("Patent Owner" or "Hannibal") (collectively, the "Settling Parties") jointly request termination of this proceeding, IPR2025-01189, directed to U.S. Patent No. 11,368,911 (the "'911 Patent"), as a result of a Settlement and License Agreement that resolves all pending disputes between Petitioners and Patent Owner. As permitted by statute, the Settling Parties request that the Board treat as business confidential information, the true and complete copy of the Settlement and License Agreement (Confidential Ex. 2021) between the Settling Parties, as referenced in the Settling Parties' Joint Motion to Terminate *Inter Partes* Review Pursuant to 35 U.S.C. § 317 and 37 C.F.R. § 42.74, filed concurrently herewith.

35 U.S.C. § 317(b) provides that:

> *At the request of a party to the proceeding, the agreement or understanding shall be treated as business confidential information, shall be kept separate from the file of the involved patents, and shall be made available only to Federal Government agencies on written request, or to any person on a showing of good cause.*

Likewise, 37 C.F.R. § 42.74(c) provides that:

> *A party to a settlement may request that the settlement be treated as business confidential information and be kept separate from the files of an involved patent or application. The request must be filed with the settlement. If a timely request is filed, the settlement shall only be available:*

> *(1) To a Government agency on written request to the Board; or*
> *(2) To any other person upon written request to the Board to make the settlement agreement available, along with the fee specified in §42.15(d) and on a showing of good cause.*

The present request, which is being filed contemporaneously with the Settlement and License Agreement, is timely and in accordance with the foregoing authority. Therefore, the Settling Parties request that the Settlement and License Agreement (Confidential Ex. 2021) (i) be treated as business confidential information, (ii) be maintained separate from the publicly available file of the involved patent, and (iii) shall be made available only to Federal Government agencies on written request, or to persons showing good cause on written request, pursuant to 35 U.S.C. § 317(b) and 37 C.F.R. § 42.74(c). In view of the foregoing, the Settlement and License Agreement has been filed for access by the "Parties and Board Only."

Dated: April 16, 2026

/s/ Brian A. Carpenter
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/Joshua L. Goldberg/
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CERTIFICATE OF SERVICE

I, Brian A. Carpenter, hereby certify that on the 16th day of April, 2026, the foregoing **JOINT REQUEST TO TREAT SETTLEMENT AGREEMENT AS BUSINESS CONFIDENTIAL INFORMATION** was served on the following by email:

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