

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

HISENSE USA CORPORATION; and
HISENSE ELECTRONICA MEXICO S.A. de C.V.
Petitioners,

v.

VIDEOLABS, INC.,
Patent Owner.

Case No. IPR2025-01329
Patent No. 7,769,238

**JOINT REQUEST THAT THE MEMBERSHIP AND LICENSE
AGREEMENT BE TREATED AS BUSINESS CONFIDENTIAL
INFORMATION PURSUANT TO 35 U.S.C. § 317 AND 37 C.F.R. § 42.74**

LISTING OF EXHIBITS

Exhibit	Description
1001	U.S. Patent No. 7,769,238 (the “’238 patent”)
1002	Prosecution History of U.S. Patent No. 7,769,238
1003	Declaration of Dr. Kannan Ramchandran
1004	International Publication No. WO03063501A1 (“Karczewicz”)
1005	Karczewicz Priority Application No. 10/054,610
1006	Karczewicz Priority Provisional Application No. 60/369,500
1007	ITU-T Recommendation H.324 (“H.324”)
1008	ITU-T Recommendation H.263 (“H.263”)
1009	Chart Comparing disclosures from Karczewicz (Ex. 1004) and the corresponding disclosures from Karczewicz 60/369,500 Provisional Application (Ex. 1006)
1010	JVT-B045 (“Improved Low Complexity Entropy Coding for Transform Coefficients,” Bjontegaard, Gisle)
1011	U.S. Patent No. 7,099,387 (“Bjontegaard”)
1012	IPR2018-00658, Paper 14
1013	IPR2022-00628, Paper 10
1014	IEEE Publication “Scene adaptive coder,” IEEE Transactions on Communications, 1984, W. Chen, C. H. Hsia, and W.K. Pratt
1015	IEEE Publication “Motion-compensation prediction with fractional-pel accuracy,” IEEE Transactions on Communications, April 1993, Bernd Girod
1016	Confidential Membership and License Agreement

Pursuant to 35 U.S.C. § 317(b) and 37 C.F.R. § 42.74(c) and the authorization provided by the Board on November 10, 2025, Petitioners Hisense USA Corporation and Hisense Electronica Mexico S.A. de C.V. (“Petitioners”) and Patent VideoLabs, Inc. (“Patent Owner”) jointly request that the Membership and License Agreement (“Agreement”) between the parties, which has been filed concurrently with this request as Confidential Exhibit 1016 and is referenced in the parties’ Joint Motion to Terminate, be treated as business confidential information, be kept separate from the file of the involved patent and this IPR, and be made available only to Federal Government agencies on written request or to other persons upon a showing of good cause. The parties consider the Agreement to contain highly sensitive business confidential information that would substantially harm their business interests if publicly disclosed.

Respectfully submitted,

Dated: November 11, 2025

/Richard F. Martinelli/

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CERTIFICATE OF SERVICE

The undersigned hereby confirms that the foregoing paper was caused to be served on November 11, 2025 via electronic mail, upon the following attorneys of record for the Patent Owner:

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