UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

INFINEON TECHNOLOGIES AMERICAS CORP.,
Petitioner,

v.

MOSAID TECHNOLOGIES INC.,
Petitioner.

Case IPR2025-01489
Patent 7,349,448

JOINT MOTION TO EXPUNGE

Petitioner files this Joint Motion to Expunge with authorization received via email on March 20, 2026. Petitioner has conferred with Patent Owner regarding this Motion, and Patent Owner joins the motion.

I. RELIEF REQUESTED

The parties request that the following documents ("the Confidential Documents") be expunged because each contains highly confidential business information not disclosed in any of the Discretionary Decisions (Papers 21, 24):

Document Name	Document Type	Exhibit/Paper No.
Ex. 2023 Email Chain (Confidential)	Exhibit	2023
Ex. 2022 MOSAID - Infineon (Confidential)	Exhibit	2022
Ex. 2019 Conversant Response Presentation (Confidential)	Exhibit	2019
Ex. 2018 Conversant Response Presentation (Confidential)	Exhibit	2018
Ex. 2017 Response Presentation (Confidential)	Exhibit	2017
Ex. 2016 Cypress Chart (Confidential)	Exhibit	2016
Ex. 2015 Response Presentation (Confidential)	Exhibit	2015
Ex. 2014 Letter from Cypress (Confidential)	Exhibit	2014
Ex. 2012 Decl. of T (Confidential)	Exhibit	2012
Ex. 2005 Notice Letter (Confidential)	Exhibit	2005
Confidential_Declaration of Terence P. Woodsome	Exhibit	1021
Confidential_Petitioner's Opposition to Request for Discretionary Denial	Paper	13
Patent Owner Discretionary Denial Brief (Confidential)	Paper	7

II. GOOD CAUSE

The Confidential Documents contain highly confidential business information. The confidential business information has not been publicly disclosed to Petitioner's knowledge, and revelation of the information would result in harm to Petitioner and Patent Owner. As explained in Petitioner's Motion to Seal (Paper 15), the Confidential Documents include information pertaining to negotiations, terms (including financial terms), and conditions with respect to licensing and litigation settlements involving Petitioner and Patent Owner. The information is indicative of how Petitioner and Patent Owner conduct business and make business decisions relating to licensing and litigation. Petitioner and Patent Owner would suffer concrete harms from public exposure of such confidential business information. For example, a third party armed with this information would gain otherwise unavailable insight into Petitioner and Patent Owner's approach and strategy regarding patent licensing negotiations, litigation, and settlement. It is therefore particularly important that the confidential information contained in the Confidential Documents remain confidential.

None of the Confidential Documents are cited, referenced, or implicated by the Discretionary Decisions (Papers 21, 24). Accordingly, the Confidential Documents would not aid the public in any material way.

III. CONCLUSION

For all these reasons, the parties respectfully request that the Board and Director grant this Motion and expunge the Confidential Documents.

Respectfully submitted,

Date: March 27, 2026

/Kenneth Wayne Darby Jr./

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CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6(e)(4), the undersigned certifies that on March 27, 2026, a complete and entire copy of this Joint Motion to Expunge was provided via email, to Patent Owner's by serving the email correspondence addresses of record as follows:

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