## IN THE UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE PATENT TRIAL AND APPEAL BOARD

HTC CORPORATION; HTC AMERICA, INC.; SAMSUNG ELECTRONICS CO., LTD.; and SAMSUNG ELECTRONICS AMERICA, INC., Petitioners

v.

E-WATCH, INC. and E-WATCH CORPORATION Patent Owner

Case IPR2014-00989<sup>1</sup> Patent No. 7,643,168

JOINT REQUEST TO TREAT THE SETTLEMENT AGREEMENTS AS BUSINESS CONFIDENTIAL INFORMATION UNDER 35 U.S.C. § 317(b) AND 37 C.F.R. 42.74(c)

Mail Stop "PATENT BOARD"

Patent Trial and Appeal Board U.S. Patent and Trademark Office P.O. Box 1450 Alexandria, VA 22313-1450

<sup>&</sup>lt;sup>1</sup> Case IPR2015-00543 has been joined with this proceeding.



Case IPR2014-00989

Patent No. 7,643,168

Pursuant to 35 U.S.C. § 317(b) and 37 C.F.R. § 42.74(c), Petitioner HTC

Corporation and HTC America, Inc. ("HTC"), and Petitioner Samsung Electronics

Co., Ltd. and Samsung Electronics America, Inc. ("Samsung") (collectively

"Petitioners") and Patent Owner e-Watch, Inc. and e-Watch Corporation ("e-

Watch") hereby jointly request that Exhibits 1011 and 1012, which are true copies

of the written agreements between the parties, as referenced in the parties' Joint

Motion to Terminate filed concurrently herewith, be treated as business

confidential information and kept separate from the file of the involved patent

pursuant to 35 U.S.C. § 317(b) and 37 C.F.R. § 42.74(c).

The parties hereby certify that, to the best of their knowledge, the documents

sought to be protected have not been made publicly available.

Date: September 11, 2015

Respectfully submitted,

/Robert C. Curfiss/

Robert C. Curfiss

Reg. No. 26,540

19826 Sundance Drive

Humble, Texas 77346

Lead Counsel for Patent Owner

**Attorney for Patent Owner e-Watch** 



/Bing Ai/
Bing Ai
PERKINS COIE LLP
11988 El Camino Real
Suite 350
San Diego, CA 92130
ai-ptab@perkinscoie.com
Telephone: (858) 720-5700

## **Attorney for Petitioner HTC**

/Steven L. Park/
Paul Hastings, LLP
1170 Peachtree Street, NE
Suite 100
Atlanta, GA 30309
stevenpark@paulhastings.com
Telephone: (404) 815-2223

**Attorney for Petitioner Samsung** 



## **CERTIFICATION OF SERVICE (37 C.F.R. §§ 42.6(e), 42.105(a))**

The undersigned hereby certifies that the above-captioned **JOINT MOTION** 

TO TREAT THE SETTLEMENT AGREEMENTS AS BUSINESS CONFI-

DENTIAL UNDER 35 U.S.C. § 317(B) AND 37 C.F.R. 42.74(C) was served in

its entirety on September 11, 2015 on the following parties via electronic mail:

Bing Ai Cheng C. (Jack) Ko Kevin Patariu Babak Tehranchi PERKINS COIE LLP 11988 El Camino Real, Suite 350 San Diego, CA 92130 Telephone: (858) 720-5700

HTC-EWATCH-IPR-Service@perkinscoie.com

Steven L. Park
PAUL HASTINGS, LLP
1170 Peachtree Street, NE
Suite 100
Atlanta, GA 30309
Telephone: (404) 815-2223
stevenpark@paulhastings.com

Naveen Modi PAUL HASTINGS, LLP 875 15<sup>th</sup> St. N.W. Washington, D.C. 20005 Telephone: (202) 551-1700 naveenmodi@paulhastings.com

Elizabeth L. Brann PAUL HASTINGS, LLP 4747 Executive Drive - 12<sup>th</sup> Floor San Diego, CA 92121



Telephone: (858) 458-3014

elizabethbrann@paulhastings.com

/Robert C. Curfiss/

Robert C. Curfiss
Reg. No. 26,540
19826 Sundance Drive
Humble, Texas 77346
Lead Counsel for Patent Owner

