

UNITED STATES PATENT AND TRADEMARK OFFICE

---

---

BEFORE THE PATENT TRIAL AND APPEAL BOARD

---

---

BMW OF NORTH AMERICA, LLC and  
BMW MANUFACTURING CO., LLC,

*Petitioners,*

v.

INNOVATIVE DISPLAY TECHNOLOGIES LLC,

*Patent Owner.*

---

---

*Inter Partes* Review of U.S. Patent No. 6,886,956  
IPR2015-00934

---

---

**JOINT REQUEST TO TREAT SETTLEMENT AGREEMENT AS  
CONFIDENTIAL BUSINESS INFORMATION AND KEEP IT SEPARATE  
UNDER 37 C.F.R. § 42.74(c)**

Concurrently with the filing of this Request, Petitioners BMW of North America, LLC and BMW Manufacturing Co., LLC (“Petitioners”) and Patent Owner Innovative Display Technologies LLC (“Patent Owner”) are filing a Joint Motion to Terminate this *inter partes* review of U.S. Patent No. 6,886,956 (“the ‘956 patent”) due to settlement between the parties.

A true copy of the parties’ written settlement agreement is being filed as an exhibit contemporaneously with this joint motion to terminate. (Ex. 1007, Settlement Agreement). The settlement agreement has been filed for access by the “Parties and Board Only.” The settlement agreement contains business confidential information, and the parties hereby request that the settlement be kept separately, treated as business confidential information, and made available only under the provisions of 35 U.S.C. § 317(b) and 37 C.F.R. § 42.74(c).

The filing of this joint request was authorized by the Board in an e-mail communication on July 8, 2015.

Respectfully submitted,

Date: July 9, 2015

/Jeffrey D. Sanok/  
Jeffrey D. Sanok  
Reg. No. 32169  
Jonathan M. Lindsay  
Reg. No. 45810  
Crowell & Moring LLP  
1001 Pennsylvania Avenue NW

IPR2015-00934  
U.S. Patent No. 6,886,956

Joint Request for Confidential Treatment

Washington, DC 20004-2595  
Tel.: (202) 624-2500  
Fax.: (202) 628-5116  
jsanok@crowell.com  
jlindsay@crowell.com

*Counsel for Petitioners*  
*BMW of North America, LLC and*  
*BMW Manufacturing Co., LLC*

Date: July 9, 2015

/George W. Webb/  
George W. Webb III  
Reg. No. 60737  
Amir Alavi  
Pending *Pro Hac Vice* Motion  
Brian Simmons  
Pending *Pro Hac Vice* Motion  
Ahmad, Zavitsanos, Anaipakos, Alavi  
& Mensing P.C.  
1221 McKinney, Suite 3460  
Houston, TX 77010  
Tel.: (713) 655-1101  
Fax.: (713) 655-0062  
gwebb@azalaw.com  
aalavi@azalaw.com  
bsimmons@azalaw.com

*Counsel for Patent Owner*  
*Innovative Display Technologies LLC*

**CERTIFICATE OF SERVICE**

The undersigned certifies that, on this 9th day of July, 2015, true and correct copies of the foregoing JOINT REQUEST TO TREAT SETTLEMENT AGREEMENT AS CONFIDENTIAL BUSINESS INFORMATION AND KEEP IT SEPARATE UNDER 37 C.F.R. § 42.74(c) were served by Petitioners via Federal Express™ on the attorney of record for the patent owner, with a courtesy copy being sent by electronic e-mail to the attorneys of record in the co-pending litigation, at the following addresses:

**Attorney of Record  
for Patent Owner:**

George W. Webb III  
Reg. No. 60,797  
E-mail: gwebb@azalaw.com  
Ahmad, Zavitsanos, Anaipakos, Alavi & Mensing PC  
1221 McKinney, Suite 3460  
Houston, TX 77010  
Tel: (713) 655-1101  
Facsimile: (713) 655-0062

**Attorneys of Record  
in Co-Pending  
Litigation:**

Demetrios Anaipakos  
Ahmad, Zavitsanos, Anaipakos, Alavi & Mensing PC  
1221 McKinney, Suite 3460  
Houston, Texas 77010-2009

/Jonathan Lindsay /

Jonathan M. Lindsay  
Reg. No. 45,810  
CROWELL & MORING LLP  
1001 Pennsylvania Avenue NW  
Washington, DC 20004-2595  
Tel.: (949) 263-8400  
Fax.: (949) 263-8414  
JLindsay@crowell.com