

Paper No. _____
Filed: October 28, 2015

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

FORD MOTOR COMPANY,

Petitioner

v.

INNOVATIVE DISPLAY TECHNOLOGIES, LLC

Patent Owner

Case No. IPR2015-01540

Patent No. 6,886,956

**JOINT REQUEST TO TREAT SETTLEMENT AGREEMENT AS
BUSINESS CONFIDENTIAL INFORMATION AND BE KEPT SEPARATE
UNDER 35 U.S.C. §317(B) AND 37 C.FR. §42.74(C)**

Petitioner Ford Motor Company and Patent Owner Innovative Display Technologies, LLC hereby request that the settlement agreement being filed concurrently herewith as Confidential Exhibit 1015 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 pursuant to 35 U.S.C. § 317(b) and 37 C.F.R. §42.74(c). The Board authorized the parties to file this joint request via e-mail correspondence on October 27, 2015.

Dated: October 28, 2015

Respectfully submitted,

By: /s/ Eric A. Buresh

Eric A. Buresh (Lead Counsel)

Reg. No. 50,394

Jason R. Mudd (Backup Counsel)

Reg. No. 57,700

Albert F. Harris III (Backup Counsel)

Reg. No. 63,935

ERISE IP, P.A.

6201 College Blvd., Suite 300

Overland Park, Kansas 66211

P: 913-777-5600 / F: 913-777-5601

eric.buresh@eriseip.com

jason.mudd@eriseip.com

al.harris@eriseip.com

*Counsel for Petitioner, Ford Motor
Company*

By: /s/ George W. Webb

George W. Webb III (Lead Counsel)

Reg. No. 60,737

AHMAD, ZAVITSANOS,

ANAIPAKOS, ALAVI &

MENSING P.C.

1221 McKinney, Suite 3460

Houston, TX 77010

Tel: (713) 655-1101

Facsimile: (713) 655-0062

gwebb@azalaw.com

*Counsel for Patent Owner,
Innovative Display Technologies
LLC*

CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the foregoing **JOINT REQUEST TO TREAT SETTLEMENT AGREEMENT AS BUSINESS CONFIDENTIAL INFORMATION AND BE KEPT SEPARATE UNDER 35 U.S.C. § 317(B) AND 37 C.F.R. §42.74(C)** was served on October 28, 2015, via electronic mail directed to counsel of record for the Patent Owner at the following:

George W. Webb III
Reg. No. 60,737
**AHMAD, ZAVITSANOS,
ANAIPAKOS, ALAVI & MENSING P.C.**
1221 McKinney, Suite 3460
Houston, TX 77010
gwebb@azalaw.com

/s/ Jason R. Mudd _____
Jason R. Mudd

ERISE IP, P.A.