Filed on behalf of Petitioners

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UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

HYUNDAI MOTOR AMERICA, INC., HYUNDAI MOTOR COMPANY, KIA MOTORS CORPORATION & KIA MOTORS AMERICA, INC. Petitioners

v.

PAICE LLC & ABELL FOUNDATION, INC. Patent Owners

Case: IPR2016-00251 U.S. Patent No. 7,237,634

JOINT REQUEST TO FILE SETTLEMENT AGREEMENT AS BUSINESS CONFIDENTIAL PURSUANT TO 35 U.S.C. § 317 AND 35 C.F.R. 42.74(c)

Pursuant to 35 U.S.C. § 317(b) and 37 C.F.R. § 42.74(c), Petitioners Hyundai Motor America, Inc., Hyundai Motor Company, Kia Motors Corp. and Kia Motors America, and Patent Owners Paice LLC and the Abell Foundation, Inc. jointly request that the entirety of their Settlement Agreement, referenced in the Joint Motion to Terminate Proceeding and submitted as Exhibit 1591, be treated as business confidential information, and that it be kept separate from the file of the involved patent (U.S. Patent No. 7,237,634).

Date: December 22, 2015

Respectfully submitted,

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Attorneys for Petitioners – Hyundai Motor America, Inc., Hyundai Motor Company, Kia Motors Corporation & Kia Motors America, Inc.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing JOINT REQUEST TO FILE SETTLEMENT AGREEMENT AS BUSINESS CONFIDENTIAL PURSUANT TO 35 U.S.C. § 317 AND 35 C.F.R. 42.74(c) was served electronically via e-mail on December 22, 2015, in its entirety on the following:

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