

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

ZTE (USA), INC., SAMSUNG ELECTRONICS CO., LTD., AND SAMSUNG
ELECTRONICS AMERICA, INC.,
Petitioner,

v.

FUNDAMENTAL INNOVATION SYSTEMS INTERNATIONAL LLC,
Patent Owner.

Case IPR2018-00274
Patent No. 7,834,586

**JOINT REQUEST TO FILE AGREEMENT AS BUSINESS
CONFIDENTIAL INFORMATION AND KEEP IT SEPARATE FROM
FILE OF US PATENT NO. 7,834,586 UNDER 37 C.F.R. § 42.74**

Mail Stop "PATENT BOARD"
Patent Trial and Appeal Board
U.S. Patent and Trademark Office
P.O. Box 1450
Alexandria, VA 22313-1450

Pursuant to 35 U.S.C. § 317(b) and 37 C.F.R. § 42.74(c), Petitioners Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. (collectively, “Samsung”), and Patent Owner, Fundamental Innovation Systems International LLC, jointly request to file the settlement agreement between the parties (Exhibit 2015), as referenced in the Joint Motion to Dismiss Samsung, filed concurrently herewith, as business confidential information, and that the Board and the Office keep the settlement agreement separate from the file of the involved patent. In view of that request, the agreement has been filed for access “Only to Board.”

The Board authorized this request in an email dated July 13, 2018.

Dated: July 13, 2018

Respectfully submitted,

/s/ Greg Arovas

Gregory S. Arovas (Reg. 38,818)
greg.arovas@kirkland.com
Robert A. Appleby (Reg. 40,897)
robert.appleby@kirkland.com
Todd M. Friedman (Reg. 42,559)
todd.friedman@kirkland.com
Alan Rabinowitz (Reg. 66,217)
arabinowitz@kirkland.com
KIRKLAND & ELLIS LLP
601 Lexington Avenue
New York, NY 10028
T: 212-446-4800
F: 212-446-6460

Eugene Goryunov (Reg. 61,579)
eugene.goryunov@kirkland.com
KIRKLAND & ELLIS LLP
300 North LaSalle Street
Chicago, IL 60654
T: 312-862-2000
F: 312-862-2200

/s/ Hong Zhong

Michael R. Fleming (Reg. No. 67,933)
H. Annita Zhong (Reg. No. 66,530)
Irell & Manella LLP
1800 Avenue of the Stars, Suite 900
Los Angeles, CA 90067
Tel: (310) 277-1010
Fax: (310) 203-7199
Email: MFleming@irell.com
Email: HZhong@irell.com

CERTIFICATE OF SERVICE

I hereby certify, pursuant to 37 C.F.R. section 42.6, that on July 13, 2018, a complete copy of the foregoing document, Joint Motion to Dismiss Samsung from Proceeding Pursuant to 35 U.S.C. § 317(a) and 37 C.F.R. § 42.05(a), and Exhibit 2015 were served upon the following, by electronic mail:

KIRKLAND & ELLIS LLP

Gregory S. Arovas

greg.arovas@kirkland.com

Robert A. Appleby

robert.appleby@kirkland.com

Todd M. Friedman

todd.friedman@kirkland.com

Alan Rabinowitz

alan.rabinowitz@kirkland.com

Eugene Goryunov

eugene.goryunov@kirkland.com

I further certify, pursuant to 37 C.F.R. section 42.6, that on July 13, 2018, a complete copy of the foregoing document and Joint Motion to Dismiss Samsung from Proceeding Pursuant to 35 U.S.C. § 317(a) and 37 C.F.R. § 42.05(a) were served upon the following, by electronic mail:

MCDERMOTT WILL & EMERY

Charles M. McMahon

cmcmahon@mwe.com

Hersh H. Mehta

hmehta@mwe.com

/Susan M. Langworthy/

Susan M. Langworthy