Filed: July 16, 2020

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

LG ELECTRONICS INC.,

PETITIONER,

V.

BELL NORTHERN RESEARCH, LLC,

PATENT OWNER.

Case No. IPR2020-00319 U.S. Patent No. 7,039,435

JOINT REQUEST TO KEEP SEPARATE PURSUANT TO 35 U.S.C. § 317 AND 37 C.F.R. § 42.74



Pursuant to 35 U.S.C. § 317(b) and 37 C.F.R. § 42.74(c), Petitioner LG Electronics Inc. ("Petitioner") and Patent Owner Bell Northern Research, LLC ("Patent Owner") (collectively, the "Parties") jointly request that Exhibit 2021, a true copy of the written Settlement and Patent License Agreement (dated July 14, 2020) between the Parties referenced in the Joint Motion to Terminate, be treated as business confidential information and be kept separate from the file of the involved patent. The entire settlement documentation is confidential and not publicly available. The present request, which is being filed contemporaneously with the settlement documentation, is timely and in accordance with the foregoing authority.

/Timothy W. Riffe/ Timothy W. Riffe Counsel for Petitioner Reg. No. 43,881 FISH & RICHARDSON P.C. 1000 Maine Ave., S.W. Washington, D.C. 20024 Phone: 202-626-6429 /Steven W. Hartsell/

Steven W. Hartsell Counsel for Patent Owner Reg. No. 58,788 **SKIERMONT DERBY LLP** 1601 Elm Street, Suite 4400 Dallas, Texas 75201 P: 214-978-6600/F: 214-978-6601

## **CERTIFICATE OF SERVICE**

I certify that I caused to be served on the counsel for Petitioner a true and

correct copy of the foregoing Joint Request to Keep Separate Pursuant to 35 U.S.C.

§ 317 and 37 C.F.R. § 42.74, by electronic means on July 16, 2020 at the following

address of record:

Timothy W. Riffe riff@fr.com Christopher C. Hoff hoff@fr.com R. Andrew Schwentker schwentker@fr.com PTABInbound@fr.com IPR18768-0183IP1@fr.com

Dated: July 16, 2020

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Respectfully Submitted,

<u>/Steven W. Hartsell/</u> Steven W. Hartsell (Reg. No. 58,788) Counsel for Patent Owner