

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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HP INC., MICROSOFT CORPORATION, DELL INC., DELL PRODUCTS LP,  
LENOVO (UNITED STATES) INC, AND MOTOROLA MOBILITY LLC.  
Petitioners,

v.

NEODRON LTD.,  
Patent Owner.

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Case No. IPR2020-00459  
U.S. Patent No. 8,946,574

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**JOINT REQUEST TO KEEP SEPARATE PURSUANT TO 35 U.S.C.  
§ 317(b) AND 37 C.F.R. § 42.74(c)**

Patent Owner Neodron Ltd. and Petitioners HP Inc., Microsoft Corporation, Dell Inc., Dell Products LP, (collectively “Dell”), Lenovo (United States) Inc., and Motorola Mobility LLC have reached a settlement. The settlement agreements resolve the disputes in the above-captioned *inter partes* review relating to U.S. Patent No. 8,946,574 (“Patent-in-Suit”). The parties jointly request that the Board treat the settlement agreements as business confidential information and keep them separate from the files of this proceeding and the files of the Patent-in-Suit. The parties were authorized to file this Joint Motion by the Board (via email) on February 1, 2021.

### **I. Statement of Precise Relief Requested**

The parties jointly request that the Board treat the settlement agreements as business confidential information and keep them separate from the files of this proceeding and the files of the Patent-in-Suit. The parties request that the settlement agreements “be made available only to Federal Government agencies on written request, or to any person on a showing of good cause” in accordance with 35 U.S.C. § 317(b) and 37 C.F.R. § 42.74.

### **II. Reasons Why Relief Is Appropriate**

The terms of the settlement agreements require the parties to treat the settlement agreements as confidential information and limit their ability to share the settlement agreements or disclose their content with third parties. The parties have

filed copies of the settlement agreements with the Board, as required by 35 U.S.C. § 317(b) and 37 C.F.R. § 42.74. The confidential settlement agreements were filed in the PTAB E2E system to provide availability only to the Board.

Respectfully submitted,

Date: February 5, 2021

/Neil Rubin/

Neil Rubin (Reg. No. 67,030)  
Russ August & Kabat  
12424 Wilshire Blvd., 12th Fl.  
Los Angeles, CA 90025  
Phone: (310) 826-7474  
nrubin@raklaw.com

*Counsel for Patent Owner*

/James M. Heintz/

James M. Heintz (Reg. No. 41,828)  
DLA Piper LLP (US)  
11911 Freedom Dr., Suite 300  
Reston VA 20190  
Phone: (703) 773-4000  
jim.heintz@dlapiper.com

*Counsel for Petitioners*

**CERTIFICATE OF SERVICE (37 C.F.R. § 42.6(e)(1))**

The undersigned hereby certifies that the above document was served on February 5, 2021, by filing this document through the Patent Trial and Appeal Board End to End system as well as delivering a copy via electronic mail upon the following attorneys of record for the Petitioners:

James Heintz, jim.heintz@dlapiper.com  
Robert Buergi, robert.buergi@dlapiper.com  
Robert High, robert.high@finnegan.com  
Philip Ekle, philip.eklem@finnegan.com  
Aliza Carrano, aliza.carrano@finnegan.com  
Christopher Douglas, christopher.douglas@alston.com  
Caleb Bean, caleb.bean@alston.com  
DLA\_Neodron\_WDTX\_IPR@us.dlapiper.com  
Finnegan\_Lenovo\_IPRs@finnegan.com  
Dell-Neodron-ITC@alston.com

Date: February 5, 2021

/Neil Rubin /

Neil Rubin (Reg. No. 67,030)  
Russ August & Kabat  
12424 Wilshire Blvd., 12th Fl.  
Los Angeles, CA 90025  
Phone: (310) 826-7474  
nrubin@raklaw.com

*Counsel for Patent Owner*