

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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APPLE INC. AND MICROSOFT CORPORATION,  
Petitioners,

v.

NEODRON LTD.,  
Patent Owner.

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Case No. IPR2020-01000  
U.S. Patent No. 8,749,251

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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 Apple Inc. and Microsoft Corporation have reached a settlement. The settlement agreements resolve the disputes in the above-captioned *inter partes* review relating to U.S. Patent No. 8,749,251 (“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

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**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:

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Date: February 5, 2021

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