

**UNITED STATES PATENT AND TRADEMARK OFFICE**

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**BEFORE THE PATENT TRIAL AND APPEAL BOARD**

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SAMSUNG ELECTRONICS CO. LTD., SAMSUNG ELECTRONICS

AMERICA, INC. AND APPLE, INC.,

Petitioners

v.

NEONODE SMARTPHONE LLC,

Patent Owner

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Case IPR2021-00145

U.S. Patent No. 8,812,993

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**PATENT OWNER NEONODE SMARTPHONE LLC'S MOTION TO SEAL**

**TABLE OF EXHIBITS**

<b>NEO Exhibit Number</b>	<b>Description</b>
2001	Declaration of Craig Rosenberg, Ph.D. in Support of Patent Owner's Preliminary Response
2002	Craig Rosenberg, Ph.D., <i>Curriculum Vitae</i>
2003	MicroTouch Mac-'n-Touch Technical Data Sheet
2004	US Patent No. 5,406,307 (Hirayama, et al.)
2005	Transcript of 30(b)(6) Videotaped Deposition of Neonode, Inc. by Joseph Shain and Thomas Eriksson (March 19, 2012) in the matter of <i>Motorola Mobility, Inc. v. Apple Inc.</i> , CA No. 1:10cv023580, United States District Court for the Southern District of Florida.
2006	Transcript of Telephonic conference Before the Honorable Alan D. Albright (October 23, 2020), in the matter of <i>Neonode Smartphone, LLC v. Apple, Inc.</i> , Docket No. WA 20-CA-505, <i>Neonode Smartphone, LLC v. Apple, Inc.</i> , Docket No. WA 20-CA-507, United States District Court for the Western District of Texas, Waco Division
2007	Plaintiff Neonode Smartphone LLC's Motion for Issuance of Letter of Request to Examine Persons, Inspect Documents, Inspect Property Pursuant to the Hague Convention on the Taking of Evidence Abroad in Civil or Commercial Matters, and Exhibit A thereto.
2008	Apple Inc.'s Unopposed Motion for Issuance of Letter of Request to Examine Persons and Inspect Documents Pursuant to Hague Convention, and Exhibit A thereto.
2009	Order Granting Plaintiff Neonode Smartphone LLC's Motion for Issuance of Letter of Request to Examine Persons, Inspect Documents, Inspect Property Pursuant to the Hague Convention on the Taking of Evidence Abroad in Civil or Commercial Matters

<b>NEO Exhibit Number</b>	<b>Description</b>
2010	Declaration of Jakob Falkman in Support of Patent Owner's Preliminary Response
2011	Declaration of Philip Graves in Support of Patent Owner's Preliminary Response
2012	Neonode N1 Quick Start Guide, V 0.5
2013	Declaration of Craig Rosenberg, Ph.D. in Support of Patent Owner's Response to Petition
2014	Neonode Confidential Business Plan, May 2003
2015	Declaration of Per Bystedt in Support of Patent Owner's Response to Petition
2016	Declaration of Marcus Bäcklund in Support of Patent Owner's Response to Petition
2017	US Patent No. 7,880,732
2018	Transcript of Deposition of Benjamin B. Bederson, Ph.D. dated August 18, 2021
2019	Declaration of Joseph Shain in Support of Patent Owner's Response to Petition
2020	Neonode Development of Neonode N1 Terminal Accomplished and Remaining Development Phases
2021	"Neonode is Alive Again" certified translation from Swedish to English ( <a href="https://www.mobil.se/business/neonode-lever-igen">https://www.mobil.se/business/neonode-lever-igen</a> last accessed September 17, 2021)
2022	Declaration of Ulf Mårtensson in Support of Patent Owner's Response to Petition

<b>NEO Exhibit Number</b>	<b>Description</b>
2023	Neonode History
2024	Neonode Confidential Investment Memorandum, January 2004
2025	Research & Development and License Agreement between Neonode and Samsung Electronics Co., Ltd., effective July 13, 2005
2026	Excel Spreadsheet documenting Neonode sales
2027	“Pen Computing Magazine: The NeoNode N1” ( <a href="https://pencomputing.com/WinCE/neonode-n1-review.html">https://pencomputing.com/WinCE/neonode-n1-review.html</a> last accessed September 21, 2021)
2028	Unredacted copy of Patent Owner's Sur-Reply
2029	Excerpts from deposition transcript of Benjamin B. Bederson, Ph.D. dated February 28, 2022, Case No. IPR2021-00144
2030	Patent Owner's Demonstrative Exhibits (SAMSUNG-NEONODE CONFIDENTIAL-APPLE ATTORNEYS' EYES ONLY)
2031	Patent Owner's Demonstrative Exhibits (Redacted Public Version)

Pursuant to the Parties' Joint Submission of Proposed Protective Order (Paper No. 50), the Board's Order Granting Joint Request for Entry of Protective Order 37 (Paper No. 52) and the Board's Order Granting Motion to Seal (Paper No. 53), Patent Owner Neonode Smartphone LLC ("Patent Owner") hereby moves to seal portions of its demonstrative exhibits, on the ground that those portions of the Sur-Reply contain references to the terms of Exhibit 2025, which the Board has ordered to be sealed.

A public redacted version and a confidential version are filed herewith.

Dated: March 14, 2022

Respectfully submitted,

*/Philip J. Graves/*

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