

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

PANASONIC CORPORATION
Petitioner

v.

NEODRON LTD.
Patent Owner

Case IPR2021-01115
Patent No. 8,946,574

**JOINT REQUEST TO FILE SETTLEMENT AGREEMENT AS
CONFIDENTIAL BUSINESS INFORMATION PURSUANT TO
35 U.S.C. § 317(b) AND 37 C.F.R. § 42.74(c)**

Mail Stop: Patent Board
Patent Trial and Appeal Board
United States Patent and Trademark Office
P.O. Box 1450
Alexandria, VA 22313-1450

On September 15, 2021, Petitioner Panasonic Corporation and Patent Owner Neodron Ltd. settled their dispute with respect to U.S. Patent No. 8,946,574 (“the ’574 Patent”), which is subject to the above-captioned *inter partes* review proceeding. The Settlement and License Agreement (“Agreement”) between the parties fully resolves all disputes relating to the ’574 Patent before the district court and the PTAB. *See* Exhibit 1020. Pursuant to 37 C.F.R. § 42.74(b), any agreement or understanding between the parties made in connection with, or in contemplation of, the termination of a proceeding shall be in writing and a true copy shall be filed with the Board before the termination of the trial. Accordingly, the parties have filed the Agreement herewith as Exhibit 1020.

Pursuant to 35 U.S.C. § 317(b) and 37 C.F.R. § 42.74(c), the parties hereby jointly request that Exhibit 1020 is treated as confidential business information, kept separate from the files of the involved patent, and made available only to Federal Government agencies on written request, or to any person on a showing of good cause.

The terms require the parties to treat the Agreement as confidential information and limit the parties’ ability to share the settlement agreement or disclose its contents with third parties. *See* Exhibit 1020, § 7.1. Moreover, the Agreement does not contain any information material to patentability. As such, the

parties respectfully request that the Board treat Exhibit 1020 as confidential business information pursuant to 35 U.S.C. § 317(b) and 37 C.F.R. § 42.74(c).

Respectfully Submitted,

Dated: October 5, 2021

/ Christopher TL Douglas /
Christopher TL Douglas, Reg. No. 56,950

Dated: October 5, 2021

/ Reza Mirzaie /
Reza Mirzaie, Reg. No. 69,138

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

The undersigned hereby certifies that the above-captioned “JOINT REQUEST TO FILE SETTLEMENT AGREEMENT AS CONFIDENTIAL BUSINESS INFORMATION” was served in its entirety on the 5th day of October 2021, pursuant to agreement via email to counsel for Patent Owner Neodron Ltd.

at:

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By: / Christopher TL Douglas /
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