

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

CYPRESS SEMICONDUCTOR CORP. and STMICROELECTRONICS, INC.,
Petitioners,

v.

NEODRON LTD.
Patent Owner.

Case IPR2021-01128
Patent No. 8,432,173

JOINT REQUEST TO KEEP SEPARATE

Patent Owner Neodron Ltd. and Petitioners Cypress Semiconductor Corporation and STMicroelectronics, Inc., have reached a settlement. The settlement agreement resolves the disputes in the above-captioned *inter partes* review relating to U.S. Patent No. 8,432,173 (“Patent-in-Suit”). Patent Owner’s and Petitioners jointly request that the Board treat the settlement agreement as business confidential information and keep it separate from the files of this proceeding and the files of the Patent-in-Suit. Patent Owner and Petitioners were authorized to file this Joint Motion by the Board (via email) on December 23, 2021.

I. Statement of Precise Relief Requested

Patent Owner and Petitioners jointly request that the Board treat the settlement agreement as business confidential information and keep it separate from the files of this proceeding and the files of the Patent-in-Suit. Patent Owner and Petitioners request that the settlement agreement “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 agreement require Patent Owner and Petitioners to treat the settlement agreement as confidential information and limit their ability to share the settlement agreement or disclose its contents with third parties. Patent Owner and Petitioners have filed a copy of the settlement agreement with the Board, as required by 35 U.S.C. § 317(b) and 37 C.F.R. § 42.74. The confidential settlement agreement was filed in the PTAB E2E system to provide availability only to the Board.

Respectfully submitted,

Dated: December 23, 2021

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

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

The undersigned hereby certifies that the above document was served on December 23, 2021, by filing this document through the Patent Review Processing System as well as delivering a copy via electronic mail upon the following attorneys of record for the Petitioner:

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Date: January 3, 2022

/Reza Mirzaie /

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