

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

VOLKSWAGEN GROUP OF AMERICA, INC.,
FORD MOTOR COMPANY, GENERAL MOTORS LLC,
NISSAN NORTH AMERICA, INC., TESLA, INC., and
AMERICAN HONDA MOTOR CO., INC.,¹
Petitioner

v.

NEO WIRELESS LLC,
Patent Owner

Case IPR2022-01539
U.S. Patent No. 10,965,512

**JOINT REQUEST TO KEEP AGREEMENT BUSINESS CONFIDENTIAL
AND SEPARATE UNDER 37 C.F.R. § 42.74(c)**

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Patent Trial and Appeal Board
U.S. Patent & Trademark Office
P.O. Box 1450
Alexandria, VA 22313

¹ Ford Motor Company filed a motion for joinder and a petition in IPR2023-00764, and General Motors LLC, Nissan North America, Inc., Tesla, Inc., and American Honda Motor Co., Inc., filed their own motion for joinder and petition in IPR2023-00961. Both motions were granted, and, therefore, Ford Motor Company, General Motors LLC, Nissan North America, Inc., Tesla, Inc., and American Honda Motor Co., Inc., have been joined as petitioners in this proceeding.

Volkswagen Group of America, Inc. (“Petitioner Volkswagen Group of America, Inc.”) and Neo Wireless LLC (“Patent Owner”) (collectively, “the Parties”) are filing, concurrently with a Joint Motion to Terminate *Inter Partes* Review, a true copy of an executed settlement agreement (EX1055) that resolves all underlying disputes between Petitioner Volkswagen Group of America, Inc., and Patent Owner with respect to U.S. Patent No. 10,965,512 (“the ’512 patent”). Pursuant to 35 U.S.C. § 317(b) and 37 C.F.R. § 42.74(c), the Parties hereby jointly request that Exhibit 1055 be treated as business confidential information and be kept separate from the files of the ’512 Patent. The Board authorized the Parties to file this joint request in an email of January 9, 2024.

The Parties consider Exhibit 1055 to contain highly sensitive confidential business information that would substantially harm their business interests if publicly disclosed. As such, the Parties hereby jointly request that Exhibit 1055 be kept separate from the files of the ’512 Patent as set forth in 35 U.S.C § 317(b) and 37 C.F.R. § 42.74(c). The Parties hereby certify that, to the best of their knowledge, Exhibit 1055 has not been made publicly available. The settlement agreement has been filed for access by the Board only, and a copy will not be served on any other Party, due to its confidential business information.

Respectfully submitted,

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

The undersigned certifies that a true and correct copy of the foregoing

JOINT REQUEST TO KEEP AGREEMENT BUSINESS CONFIDENTIAL

AND SEPARATE UNDER 37 C.F.R. § 42.74(c) was served in its entirety

electronically via e-mail on January 9, 2024, on the following parties:

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