

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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VOLKSWAGEN GROUP OF AMERICA, INC.,  
MERCEDES-BENZ USA, LLC, and FORD MOTOR COMPANY,<sup>1</sup>  
Petitioners,

v.

NEO WIRELESS, LLC,  
Patent Owner.

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IPR2022-01539  
Patent 10,965,512 B2

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**JOINT MOTION TO KEEP CONFIDENTIAL AND SEPARATE  
PURSUANT TO 35 U.S.C. § 317 AND 37 C.F.R. § 42.74**

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<sup>1</sup> Mercedes-Benz USA, LLC filed a motion for joinder and a petition in IPR2023-00079, and Ford Motor Company filed its own motion for joinder and petition in IPR2023-00764. Both motions were granted, and, therefore, Mercedes-Benz USA, LLC and Ford Motor Company have been joined as petitioners in this proceeding.

Pursuant to 35 U.S.C. § 317(b) and 37 C.F.R. § 42.74(c), and the Board’s email authorization dated July 28, 2023, Petitioner Mercedes-Benz USA, LLC (“Mercedes”) and Patent Owner Neo Wireless LLC (“Neo”) (collectively, the “Parties”) jointly request that Exhibit 2100—the Patent License and Settlement Agreement—filed today with the Parties’ Joint Motion to Terminate be treated as business confidential information. The Parties further request that Exhibit 2100 be kept separate from the file of this proceeding and the involved patent, and that it be made available only to Federal Government agencies on written request, or to persons showing good cause on written request. Good cause exists to treat the documents as business confidential, because the documents contain confidential business information regarding the terms of the Parties’ settlement.

The parties to this Motion, *i.e.*, Mercedes and Neo, jointly request that the Board order that in the event a person or entity makes a written request, as stated in 37 C.F.R. § 42.74(c)(1)-(2), for access to the settlement agreement, that any such written request be served upon Mercedes and Neo on the day the written request is provided to the Board.

Dated: August 2, 2023

Respectfully submitted,

/s/ Kenneth J. Weatherwax

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*Counsel for Patent Owner Neo Wireless, LLC*

/s/ Celine J. Crowson

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Mercedes-Benz USA, LLC*

## **CERTIFICATE OF SERVICE**

The undersigned certifies that a copy of the following document was served via electronic service, by consent between the parties:

### **JOINT MOTION TO KEEP CONFIDENTIAL AND SEPARATE PURSUANT TO 35 U.S.C. § 317 AND 37 C.F.R. § 42.74**

The names and address of the parties being served are as follows:

Celine J. Crowson	celine.crowson@hoganlovells.com
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The following document containing confidential business information of the parties to the Joint Motion was filed Board And Filing Party Only. Accordingly, the undersigned certifies that the following document was served via electronic service, by consent between the parties, only on counsel of record for those parties:

### **EXHIBIT 2100**

The names and address of the parties being served are as follows:

Celine J. Crowson	celine.crowson@hoganlovells.com
Joseph J. Raffeto	joseph.raffeto@hoganlovells.com
Scott Hughes	scott.hughes@hoganlovells.com
Helen Y. Trac	helen.trac@hoganlovells.com

Respectfully submitted,

/ William Katz /

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Date: August 2, 2023