

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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LG Electronics, Inc.,

Petitioner

v.

Broadcom Corporation,

Patent Owner

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Case IPR2017-01544

Patent No. 7,342,967

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

Pursuant to 35 U.S.C. § 317 and 37 C.F.R. § 42.74, and the Board’s email correspondence of April 6, 2018, authorizing filing of this paper, Petitioner LG Electronics, Inc. (“Petitioner”) and Patent Owner Broadcom Corporation (“Patent Owner”) jointly request to file the Settlement Agreement, submitted concurrently herewith as Exhibit 1015 to the Joint Motion to Terminate Proceeding, in its entirety, as Business Confidential information.<sup>1</sup>

If requested, the rules permit the parties to have any filed settlement agreement treated as business confidential information and kept separate from the files of the involved patent. 37 C.F.R. § 42.74(c). Indeed, the statute requires it.

At the request of a party to the proceeding, the agreement or understanding shall be treated as business confidential information, shall be kept separate from the file of the involved patents, and shall be made available only to Federal Government agencies on written request, or to any person on a showing of good cause.

35 U.S.C. § 317(b).

Petitioner and Patent Owner hereby request that the settlement agreement filed herewith as Exhibit 1015 be treated as business confidential information, be kept separate from the file of the above captioned IPR, and be made available only

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<sup>1</sup> The Settlement Agreement has been filed electronically via E2E for “Parties and Board Only” to preserve confidentiality.

to Federal Government agencies on written request, or to any person on a showing of good cause pursuant to 35 U.S.C. § 317(b) and 37 C.F.R. § 42.74(c). In view of that request the settlement agreement has been filed for access by the “Parties and Board Only.”

Date: April 9, 2018

Respectfully submitted,

/ Erika H. Arner /

Erika H. Arner, Lead Counsel  
Reg. No. 57,540  
Lead Counsel for Petitioner

Date: April 9, 2018

Respectfully submitted,

/ John M. Caracappa /

John M. Caracappa, Lead Counsel  
Reg. No. 43,532  
Lead Counsel for Patent Owner

**CERTIFICATE OF SERVICE**

Pursuant to 37 C.F.R. § 42.6(e), the undersigned certifies that the foregoing **JOINT REQUEST TO FILE SETTLEMENT AGREEMENT AS BUSINESS CONFIDENTIAL INFORMATION PURSUANT TO 35 U.S.C. § 317 AND 37 C.F.R. § 42.74(c)** was served on April 9, 2018, via email directed to counsel of record for the patent owner at the following:

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Dated: April 9, 2018

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