UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAMSUNG ELECTRONICS CO., LTD. and SAMSUNG ELECTRONICS AMERICA, INC, Petitioner

v.

PERSONALIZED MEDIA COMMUNICATIONS, LLC, Patent Owner

> Case IPR2017-00295 Patent 8,711,885

JOINT REQUEST TO TREAT SETTLEMENT DOCUMENTS AS

BUSINESS CONFIDENTIAL INFORMATION

EXHIBITS

SAMSUNG-1001	U.S. Patent No. 8,711,885 to Harvey et al. ("the '885 Patent"
	or "'885")
SAMSUNG-1002	Excerpts from the Prosecution History of the '885 Patent
	("Prosecution History")
SAMSUNG-1003	Declaration of Dr. John Villasenor ("Dec.")
SAMSUNG-1004	Curriculum Vitae of Dr. John Villasenor
SAMSUNG-1005	International Publication No. WO 81/02961 ("Campbell- 1A")
SAMSUNG-1006	U.S. Patent No. 4,536,791 ("Campbell-1B")
SAMSUNG-1007	U.S. Patent Application Serial No. 06/135,987 ("Campbell-
	1C")
SAMSUNG-1008	U.S. Patent No. 4,225,884 ("Block")
SAMSUNG-1009	U.S. Patent No. 4,789,895 ("Mustafa")
SAMSUNG-1010	U.S. Patent No. 4,829,569 ("Seth-Smith")
SAMSUNG-1011	Plaintiff's Disclosure of Asserted Claims and Infringement
	Contentions Exhibit F, Personalized Media Communications,
	LLC v. Samsung Electronics America, Inc. et al., Civil Action
	No. 2:15-cv-01754-JRG-RSP
	(E.D. Texas Feb. 8, 2016)

SAMSUNG-1012	Plaintiff's Joint Claim Construction Submission Exhibit A,
	Personalized Media Communications, LLC v. Amazon.com,
	Inc., Civil Action No. 1:13-cv-01608-RGA (D. Del. Sept. 23,
	2014)
SAMSUNG-1013	Proof of Service for PMC Complaint Against Samsung
SAMSUNG-1014	Settlement Agreement
SAMSUNG-1015	Letter Agreement
SAMSUNG-1016	Term Sheet

Petitioner (SAMSUNG ELECTRONICS CO., LTD. and SAMSUNG ELECTRONICS AMERICA, INC.) and Patent Owner (PERSONALIZED MEDIA COMMUNICATIONS, LLC) jointly request that the settlement agreement, letter agreement, and term sheet submitted concurrently herewith be treated as business confidential information and kept separate from the files of the involved patent and *inter partes* review proceeding in accordance with 35 U.S.C. § 317(b) and 37 C.F.R. § 42.74(c).

Respectfully submitted,

2/24/2017 Date: _____

/Thomas A. Rozylowicz/

Thomas A. Rozylowicz, Reg. No. 50,620 Fish & Richardson P.C.

Date: _____ February 23, 2017

/Dmitry Kheyfits/ Dmitry Kheyfits, Reg. No. 57,244 Kheyfits P.C.

CERTIFICATE OF SERVICE

Pursuant to 37 CFR §§ 42.6(e)(4) and 42.205(b), the undersigned certifies

that on February 24, 2017, a complete and entire copy of this Joint Request to

Treat Settlement Documents as Business Confidential Information (and

accompanying exhibits) were provided via email to the Patent Owner by serving

the correspondence email address of record as follows:

Dmitry Kheyfits Andrey Belenky Kheyfits P.C 1140 Avenue of the Americas, 9th Fl. New York, New York 10036

Thomas J. Scott, Jr. Personalized Media Communications, LLC 11491 Sunset Hills Road, Suite 340 Reston, Virginia 20190

Email: <u>dkheyfits@kheyfits.com</u>

/Diana Bradley/

Diana Bradley Fish & Richardson P.C. 60 South Sixth Street, Suite 3200 Minneapolis, MN 55402 (858) 678-5667