Filed: July 1, 2020

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

VANGUARD PRODUCTS GROUP, INC., D/B/A VANGUARD PROTEX GLOBAL,

Petitioner

v.

INVUE SECURITY PRODUCTS INC.,

Patent Owner

IPR2020-00069

Patent 10,043,358 B1

JOINT MOTION TO FILE SETTLEMENT AGREEMENT AS BUSINESS CONFIDENTIAL INFORMATION UNDER 35 U.S.C. § 317

Pursuant to 35 U.S.C. § 317(b) and 37 C.F.R. § 42.74(c), Petitioner and Patent Owner jointly request that the Settlement Agreement attached hereto as Exhibit A, and referenced in the Joint Motion to Terminate Proceeding, shall be treated as business confidential information and be kept separate from the files of the involved patent, and shall be made available only 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).

Date: July 1, 2020 Respectfully submitted,

/andriy lytvyn /

Andriy Lytvyn (Reg. No. 65,166) SMITH & HOPEN, P.A. 180 Pine Avenue North Oldsmar Florida 34677 813-925-8505

Counsel for Petitioner

/ Tim F. Williams/

Tim F. Williams (Reg. No. 47,178) DORITY & MANNING, P.A. P.O. Box 1449 Greenville, SC 29602 864-271-1592

Counsel for Patent Owner

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of this Joint Motion to File the Settlement Agreement as Business Confidential was served via email on July 1, 2020, on Patent Owner's counsel of record:

Tim F. Williams timw@dority-manning.com

Trent A. Kirk trentkirk@invue.com

Scott A. Cole scole@dority-manning.com

Date: July 1, 2020 /Andriy L

/Andriy Lytvyn/
Andriy Lytvyn
Registration No. 65,166
Counsel for Petitioner

SMITH & HOPEN, P.A. 180 Pine Avenue North Oldsmar, FL 34677 813-925-8505