

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

ZF FRIEDRICHSHAFEN AG, ZF ACTIVE SAFETY AND
ELECTRONICS US LLC, AND NISSAN MOTOR COMPANY, LTD.,
Petitioner,

v.

FORAS TECHNOLOGIES LTD.,
Patent Owner.

Case IPR2024-00969
Patent 7,502,958 B2

**JOINT REQUEST THAT THE SETTLEMENT AGREEMENT BE
TREATED AS BUSINESS CONFIDENTIAL INFORMATION AND
BE KEPT SEPARATE UNDER 35 U.S.C. § 317(b)**

Pursuant to 35 U.S.C. § 317(b) and 37 C.F.R. § 42.74(c), Petitioners ZF Friedrichshafen AG, ZF Active Safety and Electronics US LLC, and Nissan Motor Company, Ltd. (“Petitioners”) and Patent Owner Foras Technologies Ltd. (“Patent Owner”) hereby jointly request that the true copy of their settlement agreement, filed concurrently herewith as Exhibit 1031 be treated as business confidential information and be kept separate from the file of this *inter partes* review (IPR) proceeding. Concurrently with the filing of this Request, Petitioners and Patent Owner are filing a Joint Motion to Withdraw the Petition for IPR due to the settlement between the parties.

The parties consider the settlement and licensing agreements to contain highly sensitive business confidential information that would substantially harm their business interests if publicly disclosed. As such, the parties hereby jointly request that the settlement and licensing agreements be kept as separate papers to be made available only under the provisions of 35 U.S.C § 317(b) and 37 C.F.R. § 42.74(c). The settlement and licensing agreements have been filed for access by the “Parties and Board Only.” The parties further 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 or licensing agreements, that any such written request be served upon the parties on the day the written request is provided to the Board.

Dated: October 25, 2024

Respectfully submitted

/John R. Hutchins/

John R. Hutchins
Reg. No. 43,686
Banner & Witcoff, Ltd.
Attorney for Petitioners

Dated: October 25, 2024

Respectfully submitted

/Brett Cooper/

Brett Cooper
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Attorney for Patent Owner

CERTIFICATE OF COMPLIANCE

This paper complies with the type-volume limitation of 15 pages, excluding those parts exempted by 37 C.F.R. § 42.24. This motion complies with the general formatting requirements of 37 C.F.R. § 42.6 and has been prepared using Microsoft Word 2016 in 14-point Times New Roman font.

Dated: October 25, 2024

/John R. Hutchins/

John R. Hutchins
Reg. No. 43,686

CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6(e), I hereby certify that I caused a true and correct copy of this JOINT REQUEST THAT THE SETTLEMENT AGREEMENT BE TREATED AS BUSINESS CONFIDENTIAL INFORMATION AND BE KEPT SEPARATE UNDER 35 U.S.C. § 317(b) in connection with IPR2024-00969 to be served via e-mail on October 25, 2024, in its entirety on the following counsel of record for Patent Owner:

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Dated: October 25, 2024

By: /Carlos Goldie/

Carlos Goldie