

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

MEDIATEK INC.,
Petitioner,

v.

DAEDALUS PRIME LLC,
Patent Owner.

Case No. IPR2025-00243
Patent No. 8,769,316

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

Petitioner MediaTek Inc. and Patent Owner Daedalus Prime LLC have entered into a settlement agreement that resolves all underlying disputes between Petitioner and Patent Owner, including the related district court proceeding, *Daedalus Prime LLC v. MediaTek Inc.*, Case No. 2-24-cv-00235-JRG (E.D. Tex.) and this *inter partes* review proceeding IPR2025-00243, involving U.S. Patent No. 8,769,316, currently before the Board.

The Board authorized the parties to file a joint motion to terminate the instant proceeding and a joint request to treat the settlement agreement as business confidential information. In accordance with 35 U.S.C. § 317(b) and 37 C.F.R. § 42.74(b), a true copy of all agreements between Petitioner and Patent Owner is being submitted concurrently herewith in this proceeding as Exhibit 1017. The Parties will file any future related agreements.

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).

Accordingly, pursuant to 37 C.F.R. § 42.74(c) and 35 U.S.C. § 317(b), Petitioner and Patent Owner jointly request that the Board treat the settlement agreement filed concurrently herewith as Exhibit 1017 and any later filed agreements as business confidential information, that the agreements be kept separate from the file of the involved patent, and that the agreements be made available only to Federal Government agencies on written request, or to other persons only on a showing of good cause.

Respectfully submitted,

Dated: June 11, 2025

/Cory C. Bell/
Cory C. Bell, Reg. No. 75,096
Lead Counsel for Petitioner
MediaTek Inc.

Dated: June 11, 2025

/Tarek N. Fahmi/
Tarek N. Fahmi, Reg. No. 41,402
Lead Counsel for Patent Owner
Daedalus Prime LLC

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing **Joint Request to Treat Settlement Agreement as Business Confidential Information Pursuant to 35 U.S.C. § 317(b) and 37 C.F.R. § 42.74(c)** was served on June 11, 2025, via email directed to counsel of record for Patent Owner at the following:

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