UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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SONY GROUP CORPORATION,
Petitioner

v.

GREENTHREAD, LLC,
Patent Owner

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Case: IPR2023-00375
U.S. Patent No. 10,734,481

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JOINT MOTION TO TERMINATE *INTER PARTES* REVIEW

Patent Owner Greenthread LLC and Petitioner Sony Group Corporation (collectively, "the Parties") have reached a settlement. Pursuant to 35 U.S.C. § 317(a) and 37 C.F.R. §§ 42.72 and 42.74, the Parties jointly request termination of this *inter partes* review of U.S. Patent No. 10,734,481 ("Patent-in-Suit"). The Parties were authorized to file this Joint Motion by the Board via email on April 25, 2023.

As required under 35 U.S.C. § 317(b) and 37 C.F.R. §§ 42.74(b), true copies of the confidential agreements (Exs. 2001 and 2002) that resolve the disputes in this *inter partes* review relating to the Patent-in-Suit are filed herewith as confidential exhibits. There are no other collateral agreements between the Parties made in connection with, or in contemplation of, the termination sought. Due to confidentiality provisions of these Exhibits, Greenthread is not permitted to share certain portions of Exhibit 2001 with any party other than the Board and its staff. Therefore, Exhibit 2001, to which Sony is not a party, is to be filed such that it is available to the Board and Patent Owner only. Exhibits 2001 and 2002 together form the complete agreement resolving the disputes in the *inter partes* review between the Parties. The Parties have conferred on this matter, and the Parties are in agreement with this procedure.

Pursuant to 35 U.S.C. § 317(b) and 37 C.F.R. § 42.74(c), the Parties are concurrently filing a Joint Request to Keep Separate, which asks the Board to treat

these agreements as business confidential information, and to keep them separate from the files of this proceeding and the files of the Patent-in-Suit.

I. Statement of Precise Relief Requested

The Parties jointly request that the Board terminate this *inter partes* review in its entirety.

II. Reasons Why Termination Is Appropriate

Termination of the proceeding with respect to the parties is proper. This *inter partes* review is still in an early stage. The petition was filed on December 17, 2022 and no preliminary response has been filed. Because all parties request termination and the Board has not yet decided the merits of the proceeding, the Board should terminate the proceeding.

In the lawsuit between Greenthread and Sony involving the Patent-in-Suit (*Greenthread, LLC v. Dell Inc. et al.*, No. 6:22-cv-00105-ADA (W.D. Tex.)), the Parties filed a joint motion to dismiss on April 27, 2023.

III. Conclusion

The Parties have settled all disputes relating to the Patent-in-Suit. This *inter partes* review is in an early stage, and the Board has not entered an institution decisions or a final written decision on the merits in this proceeding. Accordingly, the Parties respectfully request the Board to terminate this proceeding in its entirety.

Dated: May 3, 2023 Respectfully submitted,

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CERTIFICATION OF SERVICE

The undersigned hereby certifies that the foregoing **JOINT MOTION TO TERMINATE *INTER PARTES* REVIEW** has been served on Petitioner via email on the following counsel of record for Petitioner:

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Dated: May 3, 2023

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