

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

KEA CLOUD, INC. & HI AUTO, INC
Petitioners

v.

VALYANT AI, INC.
Patent Owner

IPR2023-00450
Patent 10,592,706

**JOINT MOTION TO TERMINATE
UNDER 35 U.S.C. § 317(a) AND 37 C.F.R. § 42.71(a)**

Pursuant to 35 U.S.C. § 317(a) and 37 C.F.R. § 42.71(a), Petitioners Kea Cloud, Inc. and Hi Auto, Inc., and Patent Owner Valyant AI, Inc. jointly request termination of the *inter partes* review of U.S. Patent 10,592,706 in IPR2023-00450.

Petitioners and Patent Owner have entered into respective written confidential settlement agreements that fully resolve this matter. The Parties are concurrently filing copies of the settlement agreements as Exs. 1062 and 1063 along with a request to treat them as business confidential information pursuant to 35 U.S.C. § 317(b) and 37 C.F.R. § 42.74(c). The undersigned represents that there are no other agreements, oral or written, between the parties made in connection with, or in contemplation of, the termination of the present proceeding, and that Exs. 1062 and 1063 represent true and accurate copies of the respective agreements between the parties that resolve the present proceeding.

On October 12, 2023 the Parties informed the Board of the settlement via e-mail and requested authorization to file a joint motion to terminate the proceeding with respect to both the Petitioners and the Patent Owner. As set forth in an e-mail dated October 12, 2023, the Board authorized the filing of the requested joint motion to terminate this proceeding as to all parties.

Therefore, Petitioners and Patent Owner respectfully request termination of the present proceeding.

Dated: October 16, 2023

Respectfully submitted,

/Vincent J. Galluzzo/

Vincent J. Galluzzo

Registration No. 67,830

*Lead Counsel for Kea Cloud, Inc. and Hi
Auto, Inc.*

/Dina Blikshteyn/

Dina Blikshteyn

Registration No. 63,962

Lead Counsel for Valyant AI, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on October 16, 2023, I caused a true and correct copy of the following materials:

- Joint Motion To Terminate Under 35 U.S.C. § 317(a) and 37 C.F.R. § 42.71(a)

to be sent via e-mail on the following counsel of record for Patent Owner:

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