

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

MANUFACTURING RESOURCES INTERNATIONAL, INC.
Petitioner

v.

SAMSUNG ELECTRONICS CO., LTD.
Patent Owner

Patent No. 8,223,311
Liquid Crystal Display Device Including Airflow Channel

Inter Partes Review No. IPR2023-01202

**JOINT MOTION TO TERMINATE PURSUANT TO
35 U.S.C. § 317 and 37 C.F.R. § 42.74**

I. STATEMENT OF THE PRECISE RELIEF REQUESTED

Pursuant to 35 U.S.C. § 317 and 37 C.F.R. § 42.74, Petitioner Manufacturing Resources International, Inc. (“MRI”) and Patent Owner Samsung Electronics Co., Ltd. (“Samsung”) jointly move to terminate this *inter partes* review proceeding in light of the parties’ settlement of their dispute related to the subject patent, U.S. Patent No. 8,223,311 (“the ’311 Patent”). The filing of this Joint Motion was authorized by the Board in its email of August 26, 2024. The parties are submitting this joint motion to terminate this proceeding, along with a true copy of the related Settlement Agreement (Ex. 1015). Given that MRI is the only Petitioner in this *inter partes* review proceeding, and the Settlement Agreement effectively resolves all disputes related to the ’311 Patent, this entire proceeding should be dismissed as to both Petitioner and Patent Owner.

II. STATEMENT OF REASONS FOR THE RELIEF REQUESTED

On August 22, 2024, Petitioner and Patent Owner reached an agreement resolving the underlying dispute in the above-captioned *inter partes* review. Ex. 1015. Accordingly, termination of this IPR proceeding is appropriate because all disputes between the parties regarding the ’311 Patent have been resolved. Motions to terminate based on a joint request are routinely granted in the pre-final written decision time frame before substantive briefing has been completed or an oral

hearing has been held.¹ The parties have not yet completed substantive briefing, an oral hearing has not been held, a final written decision has not issued, and termination is appropriate.

Pursuant to 35 U.S.C. § 317(b) and 37 C.F.R. § 42.74(b), a true copy of the Settlement Agreement resolving the dispute in the above-captioned *inter partes* review is being submitted as Ex. 1015 by the parties, along with a request that the Settlement Agreement be treated as business confidential information and be kept separate from the files of this proceeding in accordance with 37 C.F.R. § 42.74(c). The parties hereby certify that there are no collateral agreements or understandings made in connection with, or in contemplation of, the termination of this proceeding, pursuant to 35 U.S.C. § 317(b) and 37 C.F.R. § 42.74(b). For at least these reasons, Patent Owner and Petitioner submit that termination of this *inter*

¹ See, e.g., *Apple Inc. v. Mullen Indus. LLC*, IPR2022-01389 (P.T.A.B. Nov. 7, 2023) (Paper 20 at 3); *Nike, Inc. v. Point 3 Basketball, LLC*, IPR2016-00396 (P.T.A.B. Feb. 22, 2017) (Paper 20 at 3); *Am. Megatrends, Inc. v. Kinglite Holdings Inc.*, IPR2016-00114 (P.T.A.B. Dec. 13, 2016) (Paper 22 at 2); *Truist Bank v. United Services Automobile Association*, IPR2023-00183 (P.T.A.B. Oct. 13, 2023) (Paper 24 at 2); *Samsung Electronics Co., Ltd. v. Tessera Advanced Technologies, Inc.*, IPR2018-00466 (P.T.A.B. Feb. 4, 2019) (Paper 22 at 2).

partes review is appropriate. Pursuant to 35 U.S.C. § 317(a), because the *inter partes* review is being terminated with respect to the Petitioner, no estoppel pursuant to 35 U.S.C. § 315(e) shall attach to Petitioner MRI.

Dated: August 27, 2024

/ Linnea Cipriano /

Linnea Cipriano
Reg. No. 67,729
Goodwin Procter LLP
620 Eighth Ave.
New York, NY 10018
lcipriano@goodwinlaw.com
Tel: (212) 813-8800
Fax: (212) 355-9550

Counsel for Patent Owner

Respectfully submitted,

/ John C. Alemanni /

John C. Alemanni
Reg. No. 47,384
Kilpatrick Townsend & Stockton LLP
4208 Six Forks Road, Suite 1400
Raleigh, NC 27609
jalemanni@kilpatricktownsend.com
Tel: (919) 420-1724
Fax: (919) 420-1800

Counsel for Petitioner

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the date below a copy of this **JOINT MOTION TO TERMINATE PURSUANT TO 35 U.S.C. § 317 and 37 C.F.R. § 42.74** has been served upon the following:

GOODWIN PROCTER LLP

Linnea Cipriano, lcipriano@goodwinlaw.com

Doug Kline, dkline@goodwinlaw.com

Srikanth Reddy, sreddy@goodwinlaw.com

Naomi L. Birbach, nbirbach@goodwinlaw.com

Patrick J. McCarthy, pmccarthy@goodwinlaw.com

Christine Potkay, CPotkay@goodwinlaw.com

DG-SamsungOFFENSIVEITC@goodwinlaw.com

Dated: August 27, 2024

By: /s/ John C. Alemanni
John C. Alemanni
Reg. No. 47,384