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. 8,842,253
Liquid Crystal Display Device Having Air Conditioner

Inter Partes Review No. IPR2023-01203

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. 8,842,253 ("the '253 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 '253 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 '253 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*

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[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

Respectfully submitted,

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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:

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Dated: August 27, 2024 By: */s/ John C. Alemanni*
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