UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

LG ELECTRONICS INC.,

Petitioner,

v.

PANTECH WIRELESS, LLC,

Patent Owner

Case: IPR2023-01267

U.S. Patent No. 9,313,809

JOINT MOTION TO TERMINATE *INTER PARTES* REVIEW UNDER 37 C.F.R. 42.72

Mail Stop **Patent Board**
Patent Trial and Appeal Board
U.S. Patent and Trademark Office
P.O. Box 1450
Alexandria, VA 22313-1450

UPDATED LIST OF EXHIBITS

Exhibit ("Ex.")	Description
1001	U.S. Patent No. 9,313,809 ("'809")
1002	File History of U.S. Application No. 14/319,608 ("'809FH)
1003	Declaration of Dr. Bertrand Hochwald in Support of Petition for *Inter Partes* Review of U.S. Patent No. 9,313,809 ("Hochwald")
1004	Declaration of Friedhelm Rodermund in Support of Petition for *Inter Partes* Review of U.S. Patent No. 9,313,809 ("Rodermund")
1005	U.S. Patent Application Publication No. 2009/0225709 ("Wager")
1006	U.S. Provisional Application No. 61/015,316 ("Wager-Prov.")
1007	International Publication No. WO 2007/078155 ("Lee")
1008	R2-073254, *Further discussion on enhanced CELL_FACH in REL8* ("R2-073254" or "Nokia")
1009	3GPP Technical Specification TS 25.321 v7.5.0 (2007-06) ("TS25.321")
1010	U.S. Patent Application Publication No. 2006/0176845 ("Sarkkinen")
1011	3GPP Technical Specification TS 25.331 v7.5.0 (2007-06) ("TS25.331")
1012	U.S. Patent Application Publication No. 2006/0251027 ("Chun")
1013	U.S. Patent Application Publication No. 2009/0131052 ("Hakola")
1014	U.S. Provisional Application No. 60/985,537 ("Hakola-Prov.")
1015	International Publication No. WO 2008/081222 ("Lindskog")
1016	International Publication No. WO 2005/018241 ("Seidel")

Exhibit ("Ex.")	Description
1017	U.S. Patent Application Publication No. 2009/0006778 ("Sidi")
1018	U.S. Patent Publication No. 2005/0276266 ("Terry-266")
1019	WO Patent Application 2009/022855 ("Sung")
1020	U.S. Patent Publication No. 2005/0251722 ("Terry-722")
1021-1025	(Reserved)
1026	U.S. Patent No. 8,774,104 ("'104")
1027	File History of U.S. Application No. 12/238,910 ("'104FH")
1028	U.S. Provisional Application No. 60/982,528 ("'528-Prov.")
1029	U.S. Provisional Application No. 60/975,985 ("'985-Prov.")
1030	Third Amended Docket Control Order, *Pantech Corp. et al. v. LG Electronics Inc. et al.*, Case 5:22-cv-00113-RWS-JBB (E.D. Texas), Dkt. No. 98.
1031	Docket Navigator "Time to Trial" report for Judge Robert W. Schroeder
1032	USCourts.gov "U.S. District Court – Judicial Caseload Profile" for Eastern District of Texas
1033	Joint Claim Construction and Prehearing Statement, *Pantech Corp. et al. v. LG Electronics Inc. et al.*, Case 5:22-cv-00113-RWS-JBB (E.D. Texas), Dkt. No. 118.
1034	University of Notre Dame, Wireless Institute, "RadioHound: Distributed Spectrum Sensing"
1035	3GPP, "Introducing 3GPP"

Exhibit ("Ex.")	Description
1036	3GPP, "About 3GPP"
1037	3GPP, "Specifications Per TSG Round"
1038	ShareTechnote, "4G/LTE RACH"
1039	3GPP, "36.321"
1040	3GPP Technical Specification TS 36.321 v8.0.0 (2007-12) ("TS36.321")
1041	U.S. Patent No. 6,363,121
1042-1044	(Reserved)
1045	Declaration of Jonathan Bradford
1046-1050	(Reserved)
1051	Webpage, available at https://archive.org/legal/affidavit.php
1052	Internet Archive Capture, available at https://web.archive.org/web/20070705003208/http://www.3gpp.org/tb/home.htm
1053	Internet Archive Capture, available at https://web.archive.org/web/20070707102325/http://www.3gpp.org/
1054	Internet Archive Capture, available at https://web.archive.org/web/20070710032216/http://www.3gpp.org/tb/RAN/RAN2/RAN2.htm
1055	Internet Archive Capture, available at https://web.archive.org/web/20070701154418/http://www.3gpp.org/ftp/tsg_ran/WG2_RL2/

Exhibit ("Ex.")	Description
1056	Internet Archive Capture, available at https://web.archive.org/web/20071129220816/http://www.3gpp.org:80/ftp/tsg_ran/WG2_RL2/TSGR2_55/
1057	Webpage, available at ftp.3gpp.org/Specs
1058	Internet Archive Capture, available at https://web.archive.org/web/20070820091849/http://www.3gpp.org:80/specs/specs.htm
1059	Internet Archive Capture, available at https://web.archive.org/web/20070810002551/http://www.3gpp.org/specs/numbering.htm
1060	Internet Archive Capture, available at https://web.archive.org/web/20070810232434/http://www.3gpp.org/ftp/Specs/html-info/25-series.htm
1061	Internet Archive Capture, available at https://web.archive.org/web/20070905143259/http://www.3gpp.org/ftp/Specs/html-info/SpecReleaseMatrix.htm
1062	Internet Archive Capture, available at https://web.archive.org/web/20070525204220/http://www.3gpp.org/ftp/Specs/html-info/TSG-WG--R2.htm
1063	Internet Archive Capture, available at https://web.archive.org/web/20070523112802/http://www.3gpp.org/ftp/Specs/html-info/25321.htm
1064	3GPPP TS 25.321 V7.4.0 (2007-03), retrieved from https://web.archive.org/web/20070523112802/http://www.3gpp.org/ftp/Specs/archive/25_series/25.321/25321-740.zip (25321-740.doc in 25321-740.zip)

Exhibit ("Ex.")	Description
1065	Internet Archive Capture, available at https://web.archive.org/web/20070602105532/http://www.3gpp.org/ftp/Specs/latest/Rel-7/
1066	Internet Archive Capture, available at https://web.archive.org/web/20070907224517/http://www.3gpp.org/ftp/Specs/latest/Rel-7/25_series/
1067	Internet Archive Capture, available at https://web.archive.org/web/20070704003509/http://www.3gpp.org:80/ftp/specs/latest/
1068	Internet Archive Capture, available at https://web.archive.org/web/20060105222647/http://list.etsi.org/scripts/wa.exe?SUBED1=3gpp_tsg_ran_wg2&A=1
1069	Webpage, available at https://www.3gpp.org/FTP/tsg_ran/WG2_RL2/TSGR2_59/Docs/
1070	Webpage, available at https://list.etsi.org/scripts/wa.exe?A2=3GPP_TSG_RAN_WG2;3cceb99d.0708&S=
1071	R2-073254, retrieved from https://list.etsi.org/scripts/wa.exe?A3=ind0708&L=3GPP_TSG_RAN_WG2&E=base64&P=7845927&B=------_%3D_NextPart_001_01C7DE81.00F02165&T=application%2Fx-zip-compressed;%20name=%22R2-073254.zip%22&N=R2-073254.zip&attachment=q&XSS=3 (R2-073254 Enhanced RACH.doc in R2-073254.zip)
1072	Internet Archive Capture, available at https://web.archive.org/web/20070714151920/http://list.etsi.org:80/
1073	Internet Archive Capture, available at https://web.archive.org/web/20070816051307/http://list.etsi.org/

Exhibit ("Ex.")	Description
1074	Internet Archive Capture, available at https://web.archive.org/web/20080719190403/http://www.3gpp.org/ftp/tsg_ran/WG2_RL2/TSGR2_59/Docs/
1075	R2-073254, retrieved from https://web.archive.org/web/20080719190403/http://www.3gpp.org/ftp/tsg_ran/WG2_RL2/TSGR2_59/Docs/R2-073254.zip (R2-073254 Enhanced RACH.doc in R2-073254.zip)
1076	Draft0 minutes of the 59 TSG-RAN WG2 meeting (Athens, Greece, 25-29 June 2007), available at https://www.3gpp.org/ftp/tsg_ran/WG2_RL2/TSGR2_59/Minutes/Draft0_Minutes_RAN2-59.zip (Draft0_Minutes_RAN2-59.doc in Draft0_Minutes_RAN2-59.zip)
1077	Webpage, available at https://www.3gpp.org/ftp/tsg_ran/WG2_RL2/TSGR2_59/Minutes
1078	Excel file "3GPPRAN2_59.xls," retrieved from https://www.3gpp.org/ftp/tsg_ran/WG2_RL2/TSGR2_59/Minutes/R2-074444.zip (3GPPRAN2_59.xls in R2-074444.zip)
1079	Draft3 minutes of the 59 TSG-RAN WG2 meeting (Athens, Greece, 25-29 June 2007) (R2-074444), retrieved from https://www.3gpp.org/ftp/tsg_ran/WG2_RL2/TSGR2_59/Minutes/R2-074444.zip (Draft3_Minutes_RAN2-59.doc in R2-074444.zip)
1080	Webpage, available at https://www.3gpp.org/FTP/Specs/archive/25_series/25.321
1081	Webpage, available at https://www.etsi.org/deliver/etsi_ts/125300_125399/125321/07.05.00_60/
1082	ETSI Technical Specification 125 321 V7.5.0 (2007-06), retrieved from

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	https://www.etsi.org/deliver/etsi_ts/125300_125399/125321/07.05.00_60/ts_125321v070500p.pdf
1083	Webpage, available at https://web.archive.org/web/20131115195236/http://webapp.etsi.org/key/key.asp?full_list=y
1084	Internet Archive Capture, available at https://web.archive.org/web/20070814155639/http://www.3gpp.org/ftp/Specs/archive/25_series/25.321/
1085	Internet Archive Capture, available at https://web.archive.org/web/20070827053924/http://www.3gpp.org:80/ftp/Specs/html-info/25321.htm
1086	(Reserved)
1087	Document entitled "3GPP specifications - List of all specification numbers and titles," retrieved from https://web.archive.org/web/20071101043800/http://www.3gpp.org/specs/3GPP-Spec-Titles.zip (3GPP-Spec-Titles.doc in 3GPP-Spec-Titles.zip)
1088	Internet Archive Capture, available at https://web.archive.org/web/20071112134824/http://www.3gpp.org/ftp/Specs/html-info/SpecReleaseMatrix.htm
1089	Internet Archive Capture, available at https://web.archive.org/web/20070815092224/http://www.3gpp.org/ftp/Specs/archive/
1090	Webpage, available at https://www.etsi.org/deliver/etsi_ts/125300_125399/125331/07.05.00_60/
1091	ETSI Technical Specification 125 331 V7.5.0 (2007-06), retrieved from

Exhibit ("Ex.")	Description
	https://www.etsi.org/deliver/etsi_ts/125300_125399/125331/07.05.00_60/ts_125331v070500p.pdf
1092	Webpage, available at https://www.3gpp.org/ftp/Specs/archive/25_series/25.331
1093	Internet Archive Capture, available at https://web.archive.org/web/20070902031859/http://www.3gpp.org:80/ftp/Specs/archive/25_series/25.331/
1094	(Reserved)
1095	3GPP Technical Specification 25.331 v7.5.0 (2007-06) printed in unmodified form, retrieved from https://www.3gpp.org/ftp/Specs/archive/25_series/25.331/25331-750.zip (25331-750.doc in 25331-750.zip)
1096	Internet Archive Capture, available at https://web.archive.org/web/20070525204220/http://www.3gpp.org:80/ftp/Specs/html-info/TSG-WG--R2.htm
1097	Internet Archive Capture, available at https://web.archive.org/web/20070818015343/http://www.3gpp.org/ftp/Specs/
1098	Internet Archive Capture, available at https://web.archive.org/web/20070815120847/http://www.3gpp.org/ftp/Specs/archive/25_series/
1099	Internet Archive Capture, available at https://web.archive.org/web/20070901000715/http://www.3gpp.org/ftp/Specs/latest/
1100	Internet Archive Capture, available at https://web.archive.org/web/20070901000642/http://www.3gpp.org/ftp/Specs/latest/Rel-7/

Exhibit ("Ex.")	Description
1101	Internet Archive Capture, available at https://web.archive.org/web/20070818215743/http://www.3gpp.org/ftp/Specs/html-info/25331.htm
1102	Transcript of November 1, 2023 Call with the Board
1103-1199	(Reserved)
1200	Proposed Protective Order
1201	Declaration of Hojun Suh (Confidential)
1202	Declaration of Soo Hong (Confidential)
1203	(Reserved—*See* Ex. 1001)
1204	U.S. Patent No. 9,575,631
1205	U.S. Patent No. 9,854,545
1206	U.S. Patent No. 10,869,247
1207	U.S. Patent No. 9,065,486
1208	U.S. Patent No. 9,136,924
1209	*Pantech Corp. v. LG Electronics Inc.*, Case No. 5:22-cv-00113 (E.D. Tex.), Dkt. 182 (Order Regarding LGE's Motion for Disqualification) (Public Version)
1210	*Pantech Corp. v. LG Electronics Inc.*, Case No. 5:22-cv-00113 (E.D. Tex.), Dkt. 1 (*Pantech* Complaint)
1211	*Pantech Corp. v. LG Electronics Inc.*, Case No. 5:22-cv-00113 (E.D. Tex.), Dkt. 60-1 (Second Declaration of Jamie B. Beaber in Support

Exhibit ("Ex.")	Description
	of Plaintiff's Opposition to Defendants' Motion to Disqualify Mayer Brown) (Confidential)
1212	*Pantech Corp. v. LG Electronics Inc.*, Case No. 5:22-cv-00113 (E.D. Tex.), Dkt. 40 (Defendants' Motion to Disqualify Mayer Brown LLP) (Public Version)
1213	*Pantech Corp. v. LG Electronics Inc.*, Case No. 5:22-cv-00113 (E.D. Tex.), Dkt. 40 (Magistrate Order Regarding LGE's Motion for Disqualification) (Public Version)
1214	*In re LG Electronics Inc. and LG Electronics U.S.A., Inc.*, Case No. 23-148 (Fed. Cir.), Dkt. 8-1 (LG Electronics Inc. and LG Electronics U.S.A., Inc.'s Petition For Writ Of Mandamus) (Public Version)
1215	*Pantech Corp. v. LG Electronics Inc.*, Case No. 5:22-cv-00113 (E.D. Tex.), Dkt. 15-28 (*Jenam* Agreement) (Confidential)
1216	*Pantech Corp. v. LG Electronics Inc.*, Case No. 5:22-cv-00113 (E.D. Tex.), Dkt. 56 (Plaintiffs' Opposition to Defendants' Motion to Disqualify Mayer Brown LLP) (Public Version)
1217	*Cellular Comm's. Equip. v. LG Electronics, Inc.*, 6:14-cv-00982 (E.D. Tex.), Dkt. 1 (*CCE* 982 Complaint)
1218	*Cellular Comm's. Equip. v. LG Electronics, Inc.*, 6:13-cv-00508 (E.D. Tex.), Dkt. 1 (*CCE* 508 Complaint)
1219	*Cellular Comm's. Equip. v. LG Electronics, Inc.*, 6:13-cv-00507 (E.D. Tex.), Dkt. 442-6 (*CCE* Infringement Contentions for U.S. Patent No. 6,819,923)
1220	*Cellular Comm's. Equip. v. LG Electronics, Inc.*, 6:14-cv-00982 (E.D. Tex.), Dkt. 147-9 (*CCE* Infringement Contentions for U.S. Patent No. 8,848,556)

Exhibit ("Ex.")	**Description**
1221	*Core Wireless Licensing v. LG Electronics, Inc.*, No. 2:14-cv-00911 (E.D. Tex.), Dkt. 1 (*Core Wireless* 911 Complaint)
1222	*Core Wireless Licensing v. LG Electronics, Inc.*, No. 2:14-cv-00912 (E.D. Tex.), Dkt. 1 (*Core Wireless* 912 Complaint)
1223	*Core Wireless Licensing v. LG Electronics, Inc.*, No. 2:14-cv-00911 (E.D. Tex.), Dkt. 13 (*Core Wireless* 911/912 Consolidation Order)
1224	*Core Wireless Licensing v. LG Electronics, Inc.*, No. 2:14-cv-00911 (E.D. Tex.), Dkt. 363 (*Core Wireless* Proposed Joint Pretrial Order)
1225	*Core Wireless Licensing v. LG Electronics, Inc.*, No. 2:14-cv-00911 (E.D. Tex.), Dkt. 232 (*Core Wireless* Appearance of Jamie B. Beaber)
1226	*Mobile Tele. Tech. v. LG Electronics, Inc.*, No. 2:13-cv-00947 (E.D. Tex.), Dkt. 20 (*MTT* Complaint)
1227	U.S. Patent No. 8,713,476
1228	U.S. Patent No. 6,978,143
1229	U.S. Patent No. 6,477,151
1230	U.S. Patent No. 8,848,556
1231	U.S. Patent No. 6,091,717
1232	U.S. Patent No. 8,055,820
1233	U.S. Patent No. 7,764,966
1234	U.S. Patent No. 7,804,850
1235	U.S. Patent No. 8,434,020
1236	U.S. Patent No. 6,094,426

Exhibit ("Ex.")	**Description**
1237	U.S. Patent No. 7,215,962
1238	U.S. Patent No. 5,809,428
1239	U.S. Patent No. 6,266,321
1240	U.S. Patent No. 6,778,521
1241	*Cellular Comm's. Equip. v. LG Electronics, Inc.*, 6:13-cv-00507 (E.D. Tex.), Dkt. 442-1 (*CCE* Infringement Contentions)
1242	*Mobile Tele. Tech. v. LG Electronics, Inc.*, No. 2:13-cv-00947 (E.D. Tex.) Docket Sheet
1243	*Cellular Comm's. Equip. v. LG Electronics, Inc.*, 6:16-cv-00365 (E.D. Tex.), Dkt. 2 (*CCE* 365 Complaint)
1244	*Cellular Comm's. Equip. v. LG Electronics, Inc.*, 6:13-cv-00508 (E.D. Tex.) Docket Sheet Excerpt
1245	*Cellular Comm's. Equip. v. LG Electronics, Inc.*, 6:14-cv-00982 (E.D. Tex.) Docket Sheet Excerpt
1246	*Cellular Comm's. Equip. v. LG Electronics, Inc.*, 6:16-cv-00365 (E.D. Tex.), Docket Sheet Excerpt
1247	*Core Wireless Licensing v. LG Electronics, Inc.*, No. 2:14-cv-00911 (E.D. Tex.) Docket Sheet Excerpt
1248	LGE Emails (Confidential – Privileged)
1249	*Jenam Tech, L.L.C. v. LG Electronics, Inc.*, No. 4:19-cv-00249 (E.D. Tex.), Dkt 1 (*Jenam* Complaint)
1250	*Jenam Tech, L.L.C. v. LG Electronics, Inc.*, No. 4:19-cv-00249 (E.D. Tex.) Docket Sheet Excerpt

Exhibit ("Ex.")	**Description**
1251	LGE-Pantech Emails from 2021-04-01 to 2021-05-06 (Translated) (Confidential)
1252	LGE-Mayer Brown Emails on 2015-06-04 (Confidential)
1253	*CCE* Production Metadata (Confidential)
1254	LGE-Mayer Brown Emails from 2015-09-09 to 2015-11-06 (Confidential)
1255	*CCE* Source Code Production Data (Confidential)
1256	LGE-Mayer Brown Emails from 2020-01-24 to 2020-01-29 (Confidential)
1257	*Jenam* Production Metadata (Confidential)
1258	*Pantech* Preliminary Infringement Contentions of U.S. Patent No. 9,575,631
1259	*Pantech* Preliminary Infringement Contentions of U.S. Patent No. 9,854,545
1260	*Pantech* Preliminary Infringement Contentions of U.S. Patent No. 9,313,809
1261	*Pantech* Preliminary Infringement Contentions of U.S. Patent No. 9,065,486
1262	*Pantech* Preliminary Infringement Contentions of U.S. Patent No. 9,136,924
1263	U.S. Patent No. 6,775,548
1264	U.S. Patent No. 5,946,320
1265	IPR2023-01271 – Request for Extension

Exhibit ("Ex.")	**Description**
1266	2023-12-26 Dkt. 30 Mandamus Order
1267-1299	(Reserved)
1300	Petitioner's Offered Sotera Stipulation
1301	Settlement Agreement (Confidential)

I. INTRODUCTION

Pursuant to 37 C.F.R. 42.72, Pantech Wireless, LLC ("Patent Owner") and LG Electronics Inc. ("Petitioner"), by and through their respective counsel of record, jointly request dismissal and termination of the petition for *Inter Partes* Review ("IPR") of U.S. Patent No. 9,313,809 in IPR2023-01267.

On August 13, 2024, the Parties informed the Board via email that the Parties entered into a confidential settlement agreement that resolves all underlying disputes between the Parties with respect to the '809 patent and requested authorization to file a motion to terminate the petition with respect to both the Patent Owner and the Petitioner and a motion to keep the agreement confidential and separate from the file of the '809 patent. As set forth in an email dated August 13, 2024, the Board authorized the filing of the requested motion to terminate this petition and motion to keep the agreement confidential and separate. Accordingly, the Parties jointly request termination of the present proceeding.

II. ARGUMENT

IPR proceedings "shall be terminated with respect to any petitioner upon the joint request of the petitioner and the patent owner, unless the Office has decided the merits of the proceeding before the request for termination is filed." 35 U.S.C.

§ 317(a); *see also id.* ("If no petitioner remains in the inter partes review, the Office may terminate the review….").

A. Termination is Appropriate

Petitioner and Patent Owner have entered into a written confidential agreement that fully resolves this matter. The Parties are concurrently filing a copy of the agreement as Exhibit 1301 along with a motion to treat it as confidential business information pursuant to 35 U.S.C. § 317(b) and 37 C.F.R. § 42.74.

Pursuant to 37 C.F.R. § 42.74(b), the Parties acknowledge that, as of the filing of this Motion and the concurrent Motion to Keep Confidential, that Exhibit 1301 represents the entire agreement or understanding between the Parties made in connection with, or in contemplation of, the termination of this proceeding, and further, that Exhibit 1301 is a true and accurate copy of the agreement between the Parties that resolves the present proceeding. There are no collateral agreements or understandings made in connection with, or in contemplation of, the termination of this *inter partes* review. The Parties agree that neither Patent Owner nor Petitioner will be prejudiced by termination of this proceeding.

The parties "may terminate the proceeding . . . unless the Board has already decided the merits of the proceeding." Consolidated Office Patent Trial Practice Guide, 4 (November 2019); *see also* 35 U.S.C. § 317(a). The Board has not decided

the merits of this proceeding. This proceeding is still in its early stages. Patent Owner has yet to file its Patent Owner Response. The parties have now settled their dispute and have reached agreement to terminate the Petition.

Public policy favors terminating the present petition for IPR. Congress and federal courts have expressed a strong interest in encouraging settlement in litigation. *See, e.g., Delta Air Lines, Inc. v. August*, 450 U.S. 346, 352 (1981) ("The purpose of [Fed. R. Civ. P.] 68 is to encourage the settlement of litigation."); *Bergh v. Dept. of Transp.*, 794 F.2d 1575, 1577 (Fed. Cir. 1986) ("The law favors settlement of cases."), *cert. denied*, 479 U.S. 950 (1986). The Federal Circuit places a particularly strong emphasis on settlement. *See Cheyenne River Sioux Tribe v. U.S.*, 806 F.2d 1046, 1050 (Fed. Cir. 1986) (noting that the law favors settlement to reduce antagonism and hostility between parties). And the Board's Trial Practice Guide stresses that "[t]here are strong public policy reasons to favor settlement between the parties to a proceeding." Office Patent Trial and Appeal Board Consolidated Trial Practice Guide, at 86 (Nov. 2019).

B. Status of Related Litigation

This *Inter Partes* Review is related to *Pantech Corp. v. LG Electronics Inc.*, No. 5:22-cv-00113-RWS (E.D. Tex.). That proceeding has also been resolved.

C. Identification and Status of Related Proceedings Before the USPTO

LG filed its petition for Inter Partes Review (Paper No. 2) on August 11, 2023, the Board issued a Decision to Institute (Paper No. 26) on April 25, 2024, and Pantech filed its Objections to Evidence (Paper No. 28) on May 8, 2024. No other substantive papers have been filed since Institution. The Parties have now resolved their dispute and reached agreement to terminate this proceeding. Additionally, there are no other pending USPTO proceedings regarding the '809 patent. And the Parties do not anticipate further litigation between them concerning the '809 patent. The parties are also concurrently filing similar motions to terminate proceedings with respect to all of the IPRs pending between the parties, including this proceeding—namely, IPR2023-01267 through -01273.

The USPTO can conserve its resources by terminating now, removing the need for the Board to further consider the arguments and to render a Final Decision. Therefore, the Parties respectfully request termination of this *Inter Partes* Review of the '809 patent.

Dated: August 16, 2024

Respectfully submitted,

/*James L. Davis, Jr.*/

/*Amanda Bonner*/

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Counsel for Pantech

CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.105, I hereby certify that a true and correct copy of this **JOINT MOTION TO TERMINATE *INTER PARTES* REVIEW UNDER 37 C.F.R. 42.72** was served by electronic mail to the attorneys of record, at the following addresses:

LGE-Pantech-Ropes-IPR-Service@ropesgray.com
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Respectfully submitted,

Date: August 16, 2024 By: /*James L. Davis, Jr.*/

Name: James L. Davis, Jr.
Counsel for Petitioner
LG ELECTRONICS INC.