UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

US CONEC LTD.,
Petitioner

v.

SENKO ADVANCED COMPONENTS, INC.,
Patent Owner

Case IPR2024-00116
U.S. Patent No. 11,307,369

JOINT MOTION TO TERMINATE *INTER PARTES* REVIEW

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

PETITIONER'S UPDATED EXHIBIT LIST

Exhibit Number	Description
1001	U.S. Patent No. 11,307,369 to Takano et al. ("'369 Patent")
1002	File History of U.S. Patent No. 11,307,369 to Takano et al.
1003	International Publication No. WO 2015/027033 to Scherer et al. ("Scherer")
1004	International Publication No. WO 2017/127208 to Lee ("Lee")
1005	U.S. Publication No. 2017/0227720 to Lin ("Lin")
1006	*Curriculum Vitae* of James F. Brennan III, Ph.D.
1007	Exhibit I of Complaint – Claim Chart U.S. Patent No. 11,307,369 and MMC, *Senko Advanced Components, Inc. v. US Conec, Ltd.*, No. 1:23-cv-00083 (D. Del. Jan. 24, 2023), ECF No. 1-1
1008	Childers, Darrell, et al., "Multi-Fiber, MT Ferrule Endface Fiber Tip Displacement Model for Physical Contact Interconnects," White Paper (2006)
1009	U.S. Publication No. 2016/0238796 to Nguyen et al. ("Nguyen")
1010	U.S. Patent No. 8,465,317 to Gniadek et al. ("Gniadek")
1011	Declaration of James F. Brennan III, Ph.D. (IPR2024-00115)
1012	Declaration of James F. Brennan III, Ph.D. (IPR2024-00116)
1013	Wenke, I.G., "Report on Fiber Optic Cables," *HSB Technical Report* (2015)
1014	Kant, K., "Data Center Evolution: A Tutorial on State of the Art, Issues, and Challenges," *Computer Networks*, 53:2939-65 (2009)
1015	Curran, M. & Shirk, B., "Basics of Fiber Optics", accessed at https://www.fibersystems.com/pdf/whitepapers/Basics-of-Fiber-Optics.pdf (May 2016)
1016	"19-Inch Rack," *Lite-On*, accessed at https://liteon-cips.com/products/racks/19-inch-rack/

Exhibit Number	Description
1017	"Fiber Optic Rack Mount Enclosure, 3-Panel 1 RMS," *Computer Cable Store*, accessed at https://www.computercablestore.com/fiber-optic-rack-mount-enclosure-3-panel-1-rms
1018	"Fiber Optic Connector Tutorial," Fibermart, accessed at https://www.fiber-mart.com/news/fiber-optic-connector-tutorial-a-848.html
1019	U.S. Patent No. 5,615,293 to Sayegh ("Sayegh")
1020	Complaint, Senko Advanvced Components, Inc. v. US Conec Ltd., Case No. 1:23-cv-00083 (D. Del.)
1021	Settlement Agreement (Confidential)

Pursuant to 37 C.F.R § 42.74 and the authorization provided by the Board, Pursuant to 35 U.S.C. § 317(b) and 37 C.F.R. § 42.74(c), Petitioner US Conec Ltd. ("Petitioner") and Patent Owner Senko Advanced Components, Inc. ("Patent Owner") (collectively, the "Parties") jointly request termination of this proceeding, IPR2024-00116, directed to U.S. Patent No. 11,307,369 ("the '369 patent").

Petitioner and Patent Owner are currently submitting a true copy of any agreement or understanding between Petitioner and Patent Owner made in connection with, or in contemplation of, the termination of the proceeding under 37 C.F.R. § 42.74(b) with this joint motion. The Parties further jointly certify that there are no further agreements or understandings, oral or written, between them, including any collateral agreements, made in connection with, or in contemplation of, the termination of this proceeding as set forth in 35 U.S.C. § 317(b). The Parties request that any agreement or understanding submitted be maintained as business confidential under 37 C.F.R. § 42.74(c), and are concurrently filing a separate joint request to this effect.

Petitioner and Patent Owner have resolved their disputes regarding the '369 patent, including both in this proceeding and Patent Owner's assertion of the '369 patent in the related district court litigation, *Senko Advanced Components, Inc. v. US Conec Ltd.*, 1:23-cv-00083 (D. Del.). The parties do not anticipate further litigation between them concerning the '369 patent. The following proceedings

involving the parties are currently pending before the Board and have been instituted: IPR2024-00115, IPR2024-00117, IPR2024-00118, IPR2024-00119, IPR2024-00120, IPR2024-00121. The following proceedings involving the parties are currently pending before the Board and have not been instituted: IPR2024-00805, PGR2024-00032, PGR2024-00037, IPR2024-01074. Institution was denied in IPR2024-00122, involving the parties, and Petitioner has submitted a rehearing request. The '369 patent is involved in IPR2024-00115, in which a Joint Motion to Terminate is being concurrently filed.

I. STATEMENT OF RELIEF REQUESTED

As authorized by the Board, the parties are jointly and contemporaneously filing: (i) this joint motion to terminate the proceeding; (ii) a true copy of any agreement or understanding between Petitioner and Patent Owner made in connection with, or in contemplation of, the requested termination of the Petition; and (iii) a joint request to treat the agreement as business confidential information and keep the agreement separate from the file of the involved patent, pursuant to 37 C.F.R. § 42.74(c).

Petitioner and Patent Owner jointly request that the Board terminate this proceeding in its entirety. Termination is appropriate at this stage and in view of a settlement between Petitioner and Patent Owner. An *inter partes* review 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 proceedings before the request for termination is filed. 35 U.S.C. § 317(a); *see also* 2019 Consolidated Patent Office Trial Practice Guidelines, p. 86 ("[T]here are strong public policy reasons to favor settlement between the parties . . . . The Board expects that a proceeding will terminate . . . unless the Board has already decided the merits of the proceeding."). Good cause exists to terminate this proceeding because (1) Petitioner and Patent Owner have resolved their disputes regarding the '369 patent; (3) this proceeding is still at an early stage because the Office has not yet decided the merits of the proceedings; and (4) terminating the proceeding now would thus serve the interests of judicial economy as well as the mutual interest of the parties.

II. CONCLUSION

Petitioner and Patent Owner respectfully request that the Board grant the parties' Joint Motion to Terminate this proceeding in its entirety. This joint pleading is being filed by the Petitioner, with the consent of the Patent Owner.

Respectfully submitted,

STERNE, KESSLER, GOLDSTEIN & FOX PLLC

/Jason D. Eisenberg/

Jason D. Eisenberg
Registration No. 43,447
Counsel for Petitioner US Conec Ltd.

Date: August 27, 2024

1101 K Street, NW, 10th Floor
Washington, DC 20005
(202) 371-2600

CERTIFICATE OF SERVICE (37 C.F.R. § 42.6(e)(1))

The undersigned certifies that true and correct copies of the foregoing **JOINT MOTION TO TERMINATE *INTER PARTES* REVIEW** and **EXHIBIT 1021 (CONFIDENTIAL)** were served in their entireties electronically via e-mail on August 27, 2024, on the following counsel of record for Patent Owner:

Kurt F. James (Lead Counsel) kurt.james@stinson.com
John R. Schroeder (Back-Up Counsel) john.schroeder@stinson.com
David S. Kim (Back-Up Counsel) david.kim@stinson.com
Jonathan G. Pollmann (Back-Up Counsel) jonathan.pollmann@stinson.com
Steven Levitt (Back-Up Counsel) steven.levitt@stinson.com
STINSON LLP

Respectfully submitted,
STERNE, KESSLER, GOLDSTEIN & FOX PLLC

/Jason D. Eisenberg/

Jason D. Eisenberg
Registration No. 43,447
Counsel for Petitioner US Conec Ltd.

Date: August 27, 2024

1101 K Street, NW, 10th Floor
Washington, DC 20005
(202) 371-2600

20895508.DOCX