

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SCOUT ENERGY MANAGEMENT, LLC, and
CHEVRON U.S.A. INC.
Petitioners

v.

PILOT INTELLECTUAL PROPERTY, LLC,
Patent Owner

IPR2024-00385
Patent No. 8,505,332

JOINT MOTION TO TERMINATE PROCEEDING

EXHIBIT LIST

Exhibit	Description
1001	U.S. Patent No. 8,505,332 (the “’332 Patent”)
1002	Declaration of Dr. David Rockstraw
1003	Prosecution History of the ’332 Patent
1004	U.S. Pat. No. 4,474,591 (“Arand”)
1005	Reducing Carbon Dioxide Emissions with Enhanced Oil Recovery Projects: A Life Cycle Assessment Approach (“Aycaguer”)
1006	U.S. Pat. No. 4,976,849 (“Soldati”)
1007	Treating Acid & Sour Gas: CO ₂ Recovery by the Ryan/Holmes Process (“Ryan”)
1008	Declaration of Dr. Sylvia Hall-Ellis
1009	Original Complaint, 4:23-cv-02505, DI. 1 (complaint and exhibits) (“Complaint”)
1010	Pilot Tests Prove Ryan/Holmes Cryogenic Acid Gas/Hydrocarbon Separations (“Holmes”)
1011	Plaintiffs’ Response in Opposition to Defendants’ Motion to Dismiss For Failure to State a Claim Under FRCP 12(B)(6) (“Opposition”)
1012	Separation Process Engineering (“Wankat”)
1013	Scheduling Order, 4:23-cv-02505, D.I. 27 (“Scheduling Order”)
1014	Comparison of Districts (“Comparison”)
1015	Curriculum Vitae of Dr. David Rockstraw
1016	U.S. Pat. No. 4,563,202 (“Yao”)

Exhibit	Description
1017	https://trc.nist.gov/cryogenics/aboutCryogenics.html (“About Cryonics”)
1018	Encyclopedia of Chemical Technology, Volume 18 (“Kirk”)
1019	Organic Chemistry, Fourth Edition (“Morrison”)
1020	Perry’s Chemical Engineers’ Handbook, Seventh Edition (“Perry”)
1021	Applied Thermodynamics (“DePriester”)
1022	U.S. Pat. No. 4,070,165 (“Colton”)
1023	Schlumberger Energy Glossary Entry for “Natural Gas Liquids”
1024	Sizing of Throttling Device for Gas/Liquid Two-Phase Flow Part 1: Safety Valves (“Diener”)
1025	Deposition of Mr. Bors (“Bors”)
1026	Deposition of Mr. Prim (“Prim”)
1027	Confidential Settlement Agreement

Pursuant to 35 U.S.C. § 317(a) and 37 C.F.R. § 42.74, Petitioners and Patent Owner (collectively, the “Parties”), through their respective counsel of record, jointly request termination of this proceeding in view of the Parties’ resolution of their dispute relating to U.S. Patent No. 8,505,332 (the “’332 Patent”). The Board authorized the filing of this Joint Motion to Terminate via e-mail dated June 23, 2025.

Termination with respect to Petitioner and Patent Owner is appropriate in the instant proceeding because the dispute between the parties has been resolved. The Parties have reached a confidential settlement of their dispute with respect to the ’332 Patent, which includes an agreement to terminate this and all related proceedings. The confidential settlement agreement between Petitioner and Patent Owner has been made in writing via e-mail communications between counsel, and a true and correct copy of the settlement e-mail communications between the Parties is filed concurrently with this motion as Exhibit 1027 (which is submitted as “Parties and Board Only”), pursuant to 35 U.S.C. § 317(b), along with a separate Joint Request to Treat as Confidential and Keep Separate Pursuant to 35 U.S.C. § 317(b). The Parties certify that there are no other collateral agreements or understandings, oral or written, between the Parties made in connection with, or in contemplation of, the termination of this proceeding. The Parties request that the settlement agreement be treated as business confidential information, be kept

separate from the files of the involved patent, and be made available only pursuant to 35 U.S.C. § 317 and 37 C.F.R. § 42.74(c).

Pursuant to 37 C.F.R. §§ 42.5 and 42.72, the Board may terminate a trial without rendering a final written decision, where appropriate, including pursuant to a joint request under 35 U.S.C. §§ 317(a). *See Winplus N. Am., Inc. v. Pilot, Inc.*, IPR2018-00488, Paper 12 (PTAB Oct. 24, 2018). “There are strong public policy reasons to favor settlement between the parties to a proceeding. . . . The Board expects that a proceeding will terminate after the filing of a settlement agreement, unless the Board has already decided the merits of the proceeding.” PTAB Consolidated Trial Practice Guide at 86 (November 2019).

This proceeding was instituted on August 9, 2024. Paper 11. Oral argument was held on May 13, 2025. *Id.* A Final Written Decision is not due until August 9, 2025. As such, the Board has not already decided the merits, making termination appropriate under 34 C.F.R. § 42.72. Moreover, the parallel litigation will be dismissed pursuant to the Parties’ settlement agreement.

Therefore, for the foregoing reasons, Petitioner and Patent Owner jointly request termination of this proceeding.

Date: June 25, 2025

Respectfully submitted,

By: /Brian W. Oaks/

Brian W. Oaks (Reg. No. 44,981)

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Scout Energy Management, LLC.

CERTIFICATE OF SERVICE

In accordance with 37 C.F.R. § 42.6(e), the undersigned certifies that on the 25th day of June, 2025, a complete and entire copy of the foregoing **JOINT MOTION TO TERMINATE PROCEEDING and Exhibit 1027** was served on Patent Owner via email to counsel of record for the Patent Owner at the following addresses:

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TWarden@conleyrose.com

Date: June 25, 2025

Respectfully submitted,

By: /Brian W. Oaks/
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