

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

FREEWHEEL MEDIA, INC.,
Petitioner,

v.

ALMONDNET, INC.,
Patent owner.

Case IPR2024-00413
Patent 7,979,307

JOINT MOTION TO TERMINATE INTER PARTES REVIEW

PETITIONER'S UPDATED EXHIBIT LIST

Previously Filed:

- Ex. 1001: U.S. Patent No. 7,979,307 (“the ’3079 patent”)
- Ex. 1002: Expert Declaration of Dr. Sanjay Ranka
- Ex. 1003: Certified Prosecution History for U.S. Patent No. 7,428,493 (“the ’493 patent”)
- Ex. 1004: Certified Prosecution History for U.S. Patent No. 7,979,307 (“the ’307 patent”)
- Ex. 1005: Certified Prosecution History for U.S. Patent No. 8,244,582 (“the ’582 patent”)
- Ex. 1006: Certified Prosecution History of U.S. Patent No. 8,494,904 (“the ’904 patent”)
- Ex. 1007: Certified Prosecution History of U.S. Patent No. 8,775,249 (“the ’249 patent”)
- Ex. 1008: Papers from the prosecution histories of related EP 00 981 582.0 and EP 08103068.6 available at <https://register.epo.org/regviewer>
- Ex. 1009: Excerpts from *AlmondNet, Inc v. Freewheel Media, Inc.*, No. 1:23-cv-00220-MN (D. Del.) (“Corresponding District Court Litigation”)
- Ex. 1010: Excerpts from *AlmondNet, Inc. et al v. Oath Holdings Inc.*, 1-19-cv-00247 (D. Del.) (“*Oath Holdings* case”)
- Ex. 1011: Excerpts from *AlmondNet, Inc., v. Samsung Electronics Co., Ltd.*, et al., 4-22-cv-07515 (N.D. Cal.) (“7515 N.D. Cal. case”), *AlmondNet, Inc. et al v. Microsoft Corporation*, 6-21-cv-00897 (W.D. Tex.) (“897 W.D. Tex. case”), and *AlmondNet, Inc. et al v. Amazon.com, Inc. et al.*, 6-21-cv-00898 (W.D. Tex.) (“898 W.D. Tex. case”)
- Ex. 1012: Excerpts from *Roku, Inc. v. AlmondNet, Inc. et al.*, 1-21-cv-01035 (D. Del.) (“1035 D. Del. case”)

- Ex. 1013: Excerpts from *Yahoo! Inc. v. AlmondNet, Inc.*, CBM2017-00049, challenging claims of the '307 patent
- Ex. 1014: Excerpts from *Yahoo! Inc. v. AlmondNet, Inc.*, CBM2017-00050, challenging claims of the '249 patent
- Ex. 1015: Excerpts from *Yahoo! Inc. v. AlmondNet, Inc.*, CBM2017-00051, challenging claims of the '904 patent
- Ex. 1016: Excerpts from *Yahoo! Inc. v. AlmondNet, Inc.*, CBM2017-00052, challenging claims of the '582 patent
- Ex. 1017: Excerpts from *Samsung Electronics Co., Ltd. v. AlmondNet, Inc.*, IPR2022-01260, challenging claims of the '582 patent
- Ex. 1018: Excerpts from *Amazon.com, Inc. v. AlmondNet, Inc.*, IPR2022-01455, challenging claims of the '582 patent
- Ex. 1019: Excerpts from *Meta Platforms, Inc. v. AlmondNet, Inc.*, IPR2022-01436, challenging claims of the '582 patent
- Ex. 1020: “Brief History of the Internet,” by Barry Leiner et al., Internet Society, 1997
- Ex. 1021: “Addressing URL,” Internet Engineering Task Force (IETF), URI working Group, w3.org/Addressing/URL/url-spec.txt, 1994
- Ex. 1022: “HTML Sourcebook,” by Ian S. Graham, John Wiley & Sons, Inc., 1995, excerpts
- Ex. 1023: “Hypertext Transfer Protocol -- HTTP/1.0,” Internet Engineering Task Force (IETF), HTTP Working Group, 1996
- Ex. 1024: “Newton’s Telecom Dictionary,” 11th edition, by Harry Newton, Flatiron Publishing, Inc., 1996, excerpts
- Ex. 1025: “Hypertext Markup Language – 2.0,” RFC 1866, Internet Engineering Task Force (IETF), Network Working Group, 1995

- Ex. 1026: “Hypertext Transfer Protocol -- HTTP/1.0,” RFC 1945, Internet Engineering Task Force (IETF), Network Working Group, 1996
- Ex. 1027: “The HTTP Protocol As Implemented in W3,”
<https://www.w3.org/Protocol/HTTP/AsImplemented.html>
- Ex. 1028: U.S. Patent No. 6,183,366 (“Goldberg”)
- Ex. 1029: U.S. Patent No. 7,334,184 (“Simons”)
- Ex. 1030: U.S. Patent No. 6,055,573 (“Gardenswartz”)
- Ex. 1031: U.S. Patent No. 5,991,740 (“Messer”)
- Ex. 1032: U.S. Patent No. 6,036,601 (“Heckel”)
- Ex. 1033: “The Internet Complete Reference,” by Harley Hahn and Rick Stout, Osborne McGraw-Hill, 1994, excerpts
- Ex. 1034: “Net Worth,” by John Hagel III and Marc Singer, Harvard Business School Press, 1999
- Ex. 1035: U.S. Patent No. 5,948,061 (“Merriman”)
- Ex. 1036: U.S. Patent No. 6,285,987 (“Roth”)
- Ex. 1037: U.S. Patent No. 6,415,322 (“Jaye”)
- Ex. 1038: U.S. Patent No. 5,740,252 (“Minor”)
- Ex. 1039: U.S. Patent Application Pub. No. 2002/0026351 (“Coleman”)
- Ex. 1040: U.S. Patent Application Pub. No. 2013/0097664 (“Herz”)
- Ex. 1041: U.S. Provisional Pat. App. No. 60/161,640 (“Herz provisional”)
- Ex. 1042: Herz Claim 1 Listing
- Ex. 1043: U.S. Patent No. 6,141,694 (“Gardner”)
- Ex. 1044: U.S. Patent Application Pub. No. 2001/00202 (“Gupta”)
- Ex. 1045: U.S. Patent No. 7,240,022 (“Bistriceanu”)

- Ex. 1046: “Database Management Systems,” Second Edition, by Raghu Ramakrishnan and Johannes Gehrke, McGraw-Hill Companies, Inc., 1998 (excerpts)
- Ex. 1047: “How the Internet Works,” Fourth Edition, by Preston Gralla, Que Corporation, 1998
- Ex. 1048: “A Framework for Targeting Banner Advertising On the Internet,” by Katherine Gallagher and Jeffrey Parsons, IEEE, 1997
- Ex. 1049: “A Framework for the Optimizing of WWW Advertising,” by Charu C. Aggarwal, Joel L. Wolf, and Philip S. Yu, IBM T.J. Watson Research Center
- Ex. 1050: “Unintrusive customization techniques for Web advertising,” by Marc Langheinrich et al., Elsevier Science, Computer Networks 31 (1999), pp. 1259-1272
- Ex. 1051: “Web advertising,” by Michael McCandless, IEEE, Intelligent Systems, 1998
- Ex. 1052: Expert Declaration of Dr. Hall-Ellis
- Ex. 1053: U.S. Patent No. 8,566,154 (“Merriman-Boomerang”)
- Ex. 1054: Expert Reply Declaration of Dr. Sanjay Ranka
- Ex. 1055: March 11, 2025, Deposition Transcript of Robert Sherwood
- Ex. 1056: “Database Management Systems,” Second Edition, by Raghu Ramakrishnan and Johannes Gehrke, McGraw-Hill Companies, Inc., 1998 (excerpts; chapters 20, 23, and 25)
- Ex. 1057: U.S. Patent No. 6,029,141 (“Bezos”)
- Ex. 1058: Final Written Decision from *Meta Platforms, Inc. v. AlmondNet, Inc.*, IPR2022-01436, finding all challenged claims of the ’582 patent unpatentable

Filed Herewith:

- Ex. 1059: BUSINESS CONFIDENTIAL Release Agreement

Pursuant to 35 U.S.C. § 317(b), 37 C.F.R. § 42.74(c), and the authorization provided by the Board in its June 30, 2025 email, Petitioner FreeWheel Media, Inc. (“Petitioner”) and Patent Owner AlmondNet, Inc. (“Patent Owner”) (collectively, the “Parties”) jointly request termination of this proceeding, IPR2024-00413, directed to U.S. Patent No. 7,979,307 (“the ’307 patent”).

The Parties have entered into a release agreement that resolves all underlying disputes between Petitioner and Patent Owner with respect to the ’307 patent. Based on the agreement, the Parties hereby request termination of this IPR.

With this joint motion, the Parties concurrently submit a true copy of any agreement or understanding (Exhibit 1059) between the Parties made in connection with, or in contemplation of, the requested termination of the proceeding under 37 CFR § 42.74(b) and a joint request to treat the release agreement as business confidential information and keep the release agreement (Exhibit 1059) separate from the file of the involved patent, pursuant to 37 C.F.R. § 42.74(c). There are no other agreements, oral or written, between the Parties made in connection with, or in contemplation of, the termination of this proceeding.

The litigation between the Parties regarding US 7,979,307 has been dismissed with prejudice pursuant to settlement and no further litigation between the Parties is contemplated. Apart from the present matter, there are no other proceedings in the U.S. Patent and Trademark Office regarding US 7,979,307. The following district

court litigation involving US 7,979,307 is pending:

- *AlmondNet, Inc. et al v. Viant Technology Inc. et al.*, 1:23-cv-00174-MN (D. Del.).

This joint motion is being filed by the Petitioner, with the consent of the Patent Owner.

Dated: July 7, 2025

Respectfully submitted

/Frederic M. Meeker/

Frederic M. Meeker
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Banner & Witcoff, Ltd.
Attorney for Petitioner
FreeWheel Media, Inc.

Dated: July 7, 2025

Respectfully submitted

/Reza Mirzaie/

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Attorney for Patent Owner

CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.105, I hereby certify that I caused a true and correct copy of this JOINT MOTION TO TERMINATE INTER PARTES REVIEW in connection with IPR2024-00413 to be served via e-mail on July 7, 2025, in its entirety on the following counsel of record for Patent Owner:

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Dated: July 7, 2025

By: /Carlos Goldie/

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