

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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FREEWHEEL MEDIA, INC.,  
Petitioner,

v.

INTENT IQ, LLC,  
Patent owner.

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Case IPR2024-00419  
Patent 11,564,015

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**JOINT MOTION TO TERMINATE INTER PARTES REVIEW**

## PETITIONER’S UPDATED EXHIBIT LIST

### *Previously Filed:*

- Ex. 1001: U.S. Patent No. 11,564,015 (“the ’015 Patent”)
- Ex. 1002: Declaration of Dr. David B. Lett in Support of Petition For *Inter Partes* Review Of U.S. Patent No. 11,564,015
- Ex. 1003: *Curriculum Vitae* of Dr. David B. Lett
- Ex. 1004: Certified Prosecution History for U.S. Patent No. 11,564,015
- Ex. 1005: Excerpts from Case Docket of *Meta Platforms Inc v. AlmondNet Inc et al.*, IPR2022-00773 (March 28, 2022)
- Ex. 1006: U.S. Patent Application Publication No. 2004/0076180 (“Satapati”)
- Ex. 1007: U.S. Patent Application Publication No. 2008/0113674 (“Baig”)
- Ex. 1008: U.S. Provisional Patent Application No. 60/858,204 (“Baig Provisional”)
- Ex. 1009: Redline Comparison Between Baig (Ex. 1016) and Baig Provisional (Ex. 1008)
- Ex. 1010: Reserved
- Ex. 1011: U.S. Patent No. Application Publication No. 2006/0128364 (“Costa”)
- Ex. 1012: Excerpts from E. D. Zwicky *et al.*, *Building Internet Firewalls* (2d ed. 2000) (“Zwicky”)
- Ex. 1013: Declaration of Sylvia Ellis
- Ex. 1014: Declaration of Brian J. Emfinger
- Ex. 1015: U.S. Patent Application Publication No. 2006/0265507 (“Banga507”)
- Ex. 1016: U.S. Patent Application Publication No. 2006/0271690 (“Banga690”)

- Ex. 1017: U.S. Patent Application Publication No. 2006/0242294 (“Damick”)
- Ex. 1018: U.S. Patent No. 9,123,071 (“McFarland”)
- Ex. 1019: U.S. Patent No. 8,930,239 (“Ashbaugh”)
- Ex. 1020: Reserved
- Ex. 1021: Complaint, *AlmondNet, Inc. v. FreeWheel Media, Inc.*, Case No. 1:23-cv-00220-MN (D. Del.)
- Ex. 1022: U.S. Patent No. 8,180,674 (“Madhavan”)
- Ex. 1023: Reserved
- Ex. 1024: Reserved
- Ex. 1025: Reserved
- Ex. 1026: Reserved
- Ex. 1027: Reserved
- Ex. 1028: Reserved
- Ex. 1029: Excerpts from Downing *et al.*, *Dictionary of Computer and Internet Terms* (8th ed. 2003)
- Ex. 1030: Excerpts from Newton, *Newton's Telecom Dictionary* (21st ed. 2005)
- Ex. 1031: U.S. Patent No. 6,282,548 (“Burner”)
- Ex. 1032: U.S. Patent No. 6,036,601 (“Heckel”)
- Ex. 1033: U.S. Patent Application Publication No. 2005/0096978 (“Black”)
- Ex. 1034: Reserved
- Ex. 1035: Hagel *et al.*, *Net Worth: Shaping Markets When Customers Make the Rules* (1999) (“Hagel”)

- Ex. 1036: Request for Comments: 1631, “The IP Network Address Translator (NAT)” (1994) (“RFC 1631”)
- Ex. 1037: Zeff *et al.*, *Advertising on the Internet*, (2<sup>nd</sup> ed. 1999) (“Zeff”)
- Ex. 1038: Reserved
- Ex. 1039: Request for Comments: 793, “Transmission Control Protocol” (1981) (“RFC 793”)
- Ex. 1040: Request for Comments: 2663, “IP Network Address Translator (NAT) Terminology and Considerations” (1999) (“RFC 2663”)
- Ex. 1041: ANSI/IEEE Std 802.11, 1999 Edition, “Part 11: Wireless LAN Medium Access Control (MAC) and Physical Layer (PHY) Specifications”
- Ex. 1042: Excerpts from Harley Hahn, *The Internet Complete Reference* (2d ed. 1996) (“Hahn”)
- Ex. 1043: U.S. Patent Application Publication No. 2003/0066085 (“Boyer”)
- Ex. 1044: U.S. Patent Application Publication No. 2007/0217436 (“Markley”)
- Ex. 1045: U.S. Patent Application Publication No. 2006/0230427 (“Kunkel”)
- Ex. 1046: U.S. Patent No. 6,543,052 (“Ogasawara”)
- Ex. 1047: U.S. Patent Application Publication No. 2002/0145621 (“Nguyen”)
- Ex. 1048: Excerpts from *Computer Dictionary*, Microsoft Press (2d ed. 1994)
- Ex. 1049: Excerpts from *Webster’s New World Computer Dictionary* (10th ed. 2003)
- Ex. 1050: International Publication No. WO 2007/078283 for International Patent Application No. PCT/US2005/047230 to Ashbaugh (“Ashbaugh PCT”)

- Ex. 1051: Claim Chart (Exhibit 8) Accompanying Complaint, *AlmondNet, Inc. v. FreeWheel Media, Inc.*, Case No. 1:23-cv-00220-MN (D. Del.)
- Ex. 1052: Notice of Allowance mailed on August 20, 2013, in U.S. Patent Application No. 13/167,605
- Ex. 1053: Notice of Allowance mailed on December 9, 2021, in U.S. Patent Application No. 16/925,655
- Ex. 1054: U.S. Patent Application Publication No. 2005/0108418 (“Bedi”)
- Ex. 1055: U.S. Patent Application Publication No. 2004/0177147 (“Joshi”)
- Ex. 1056: Mapping Between Baig Provisional (Ex. 1008) and Baig (Ex. 1007)
- Ex. 1057: Reserved
- Ex. 1058: Institution Decision from *Meta Platforms, Inc. f/k/a Facebook, Inc. v. Intent IQ, LLC et al.*, IPR2023-01281, Paper 7 (February 21, 2024)
- Ex. 1059: Reserved
- Ex. 1060: Reserved
- Ex. 1061: Reserved
- Ex. 1062: Reserved
- Ex. 1063: US Pat. App. Pub. No. 2002/0083445 (“Flickinger”)
- Ex. 1064: US Pat. App. Pub. No. 2008/0040742 (“Howcroft”)
- Ex. 1065: Jakob Nielsen, *Request Marketing* (Oct. 2000), <https://www.nngroup.com/articles/request-marketing/>
- Ex. 1066: Bettina Fabos, *The Commercial Search Engine Industry and Alternatives to the Oligopoly* (Mar. 2006) EastBound Journal

- Ex. 1067: Susan Young, Getting the Message: How the Internet is Changing Advertising (May 16, 2000), <https://hbswk.hbs.edu/item/getting-the-message-how-the-internet-is-changing-advertising>
- Ex. 1068: US Pat. App. Pub. No. 2002/00998842 (“Jennings”)
- Ex. 1069: US Pat. App. Pub. No. 2002/0123928 (“Eldering”)
- Ex. 1070: US Pat. No. 7,634,789 (“Gerba”)
- Ex. 1071: U.S. Pat. App. Pub. No. 2007/0180147 (“Leigh”)
- Ex. 1072: Declaration of Dr. David B. Lett in Support of Petitioner’s Reply to Patent Owner Response
- Ex. 1073: Request for Comments: 1945, “Hypertext Transfer Protocol – HTTP/1.0” (1996) (“RFC 1945”)
- Ex. 1074: Request for Comments: 2068, “Hypertext Transfer Protocol – HTTP/1.1” (1997) (“RFC 2068”)
- Ex. 1075: Excerpts from Gourley *et al.*, *HTTP: The Definitive Guide* (1<sup>st</sup> ed. 2002)
- Ex. 1076: Nielsen *et al.*, *Network Performance Effects of HTTP/1.1, CSS1, and PNG*, ACM SIGCOMM (1997)
- Ex. 1077: Cheng *et al.*, *Analysis of HTTP/1.1 Performance on a Wireless Network*, Stanford University (1999)
- Ex. 1078: Ian Hickson, “Web Applications 1.0,” (January 1, 2006). Retrieved from [\[https://web.archive.org/web/20060206170806/http://www.whatwg.org/specs/web-apps/2006-01-01/\]](https://web.archive.org/web/20060206170806/http://www.whatwg.org/specs/web-apps/2006-01-01/)
- Ex. 1079: “An Exploration of Dynamic Documents,” Netscape (1998). Retrieved from [\[https://web.archive.org/web/19981203153836/https://fishcam.netscape.com/assist/net\\_sites/pushpull.html#expand\]](https://web.archive.org/web/19981203153836/https://fishcam.netscape.com/assist/net_sites/pushpull.html#expand)
- Ex. 1080: Reserved

- Ex. 1081: Reserved
- Ex. 1082: Excerpts from Shishir Gundavaram, *CGI Programming on the World Wide Web* (1<sup>st</sup> ed. 1996)
- Ex. 1083: Daniel Goldman, “Opera takes the lead with AJAX support among browsers: More efficient streaming,” (September 1, 2006). Retrieved from [https://web.archive.org/web/20070318013327/http://operawatch.com/news/2006/09/opera-takes-the-lead-with-ajax-support-among-browsers-more-efficient-streaming.html]
- Ex. 1084: Declaration of Erik de la Iglesia in Support of Patent Owner’s Response to the Petition from *Meta Platforms, Inc., v. AlmondNet, Inc., et al.*, IPR2023-01281, Exhibit 2001 (May 29, 2024)
- Ex. 1085: User’s Guide for G-4100 v2 802.11g Wireless Hotspot Gateway, Version 1.00, ZyXEL (1<sup>st</sup> ed. July 2006) from *Meta Platforms, Inc. f/k/a Facebook, Inc. v. Intent IQ, LLC et al.*, IPR2023-01281, Exhibit 2005 (May 29, 2005)
- Ex. 1086: “Reference Manual for the MR814 v3 Cable/DSL Wireless Router,” Version 1.0, NETGEAR, Inc. (June 2004)
- Ex. 1087: Additional Excerpts from E. D. Zwicky *et al.*, *Building Internet Firewalls* (2d ed. 2000) (“Zwicky”)
- Ex. 1088: Excerpts from Arregoces *et al.*, *Data Center Fundamentals*, (2004)
- Ex. 1089: Second Declaration of Brian J. Emfinger
- Ex. 1090: Request for Comments: 1122, “Requirements for Internet Hosts – Communication Layers” (1989) (“RFC 1122”)
- Ex. 1091: Reserved
- Ex. 1092: Schaefer *et al.*, “Oracle HTTP Server Administrator’s Guide, 10g Release 2 (10.1.2),” Oracle (March 2006)
- Ex. 1093: Excerpts from Chopra, *et al.*, *Professional Apache Tomcat 5* (2004)

- Ex. 1094: November 28, 2005 Web Capture of “Apache HTTP Server Version 2.0 – Apache Core Features,” The Apache Software Foundation. Retrieved from [https://web.archive.org/web/20051128055834/httpd.apache.org/docs/2.0/mod/core.html]
- Ex. 1095: “Opera 4.0 Upgrades File Exchange: Includes HTTP 1.1,” Opera Press (March 28, 2000). Retrieved from [https://press.opera.com/2000/03/28/opera-4-0-upgrades-file-exchange-includes-http-1-1/]
- Ex. 1096: Excerpts from Kurose *et al.*, *Computer Networking: A Top-Down Approach* (6<sup>th</sup> ed. 2013)
- Ex. 1097: Request for Comments: 2663, “IP Network Address Translator (NAT) Terminology and Considerations,” (1999) (“RFC 2663”)
- Ex. 1098: Excerpts from Martin Sauter, *Communications Systems for the Mobile Information Society* (2006)
- Ex. 1099: Transcript of February 17, 2025 Deposition of Erik de la Iglesia
- Ex. 1100: Petitioner’s Oral Argument Demonstratives
- Filed Herewith:***
- Ex. 1101: 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 Intent IQ, LLC (“Patent Owner”) (collectively, the “Parties”) jointly request termination of this proceeding, IPR2024-00419, directed to U.S. Patent No. 11,564,015 (“the ’015 patent”).

The Parties have entered into a release agreement that resolves all underlying disputes between Petitioner and Patent Owner with respect to the ’015 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 1101) 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 1101) 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 11,564,015 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 11,564,015. The

following district court litigation involving US 11,564,015 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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Dated: July 7, 2025

Respectfully submitted

/Reza Mirzaie/

Reza Mirzaie  
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## **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 IPR2024-00419 to be served via e-mail on July 7, 2025, in its entirety on the following counsel of record for Patent Owner:

RMIRZAIE@RAKLAW.COM  
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Dated: July 7, 2025

By: /Carlos Goldie/

Carlos Goldie