

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

Nokia of America Corp., Ericsson Inc., AT&T Services, Inc., Cellco Partnership
d/b/a Verizon Wireless, T-Mobile USA, Inc.,
Petitioners

v.

Wireless Alliance LLC
Patent Owner

IPR2024-00619
Patent No. 10,045,383

JOINT MOTION TO TERMINATE *INTER PARTES* REVIEW

Patent Owner's Exhibit List

Exhibit	Description
2001	First Amended Docket Control Order from <i>Wireless Alliance, LLC v. AT&T Mobility LLC</i> , No. 2:2[3]-cv-00095-RWS-RSP, Dkt. 86 (E.D. Tex. May 2, 2024)
2002	Defendants' And Intervenor's Preliminary Invalidity Contentions Regarding U.S. Patent Nos. 9,144,106; 9,565,662; 10,045,383
2003	Scheduling Order from <i>Intellectual Ventures I LLC v. MVware, Inc.</i> , No. 1:19-cv-01075-ADA (W.D. Tex. Dec. 10, 2019).
2004	Memorandum Opinion and Order [Denying Stay] from <i>Force MOS Tech., Co., Ltd. v. ASUSTek Computer, Inc.</i> , No. 2:22-cv-00046-JRG (E.D. Tex. Apr. 10, 2024)
2005	Order [Denying Stay] from <i>General Access Solutions, Ltd. v. Cellco Partnership D/B/A Verizon Wireless</i> , No. 2:22-cv-00394-JRG (E.D. Tex. May 22, 2024)
2006	Docket Report from <i>Wireless Alliance, LLC v. AT&T Mobility LLC</i> , No. 2:23-cv-00095-RWS-RSP (E.D. Tex. June 9, 2024).
2007	Claim Construction Order from <i>Wireless Alliance, LLC v. AT&T Mobility LLC</i> , No. 2:23-cv-00095-RWS-RSP (E.D. Tex. Apr. 24, 2024).
2008	Order of Dismissal from <i>Wireless Alliance, LLC v. AT&T Mobility, LLC</i> , No. 2:23-cv-00095-RWS-RSP (lead case) (E.D. Tex. Dec. 23, 2024).
2009	Confidential Settlement Agreement
2010	Confidential Settlement Agreement
2011	Confidential Settlement Agreement
2012	Confidential Settlement Agreement

2013	Confidential Settlement Agreement
------	-----------------------------------

I. Statement of Relief Requested

Pursuant to 35 U.S.C. § 317 and 37 C.F.R. § 42.74, all Petitioners and Patent Owner hereby jointly move to terminate the above-captioned *inter partes* review proceeding in light of the parties' settlements of their disputes regarding U.S. Pat. No. 10,045,383. The parties were originally authorized to file this Joint Motion with respect to the Petitioners Nokia of America Corporation ("Nokia"), and Ericsson Inc. ("Ericsson") by the Board (via email) on January 3, 2025. The filing of this Joint Motion was authorized by the Board on February 13, 2025 with respect to the remaining Petitioners AT&T Services, Inc. ("AT&T"), Cellco Partnership d/b/a Verizon Wireless ("Verizon"), and T-Mobile USA, Inc. ("T-Mobile").

II. Statement of Reasons for the Relief Requested

Petitioners and Patent Owner have reached settlement agreements that resolve all disputes regarding the patent involved in the above-captioned *inter partes* review proceeding. The related district court litigation has been dismissed against all of the defendants (IPR Petitioners AT&T, Verizon, and T-Mobile), and the litigation is dismissed as to the intervenors Nokia and Ericsson (the remaining IPR Petitioners). Ex. 2008. No party will remain as a petitioner in the above-captioned *inter partes* review proceeding. No litigation or proceeding between the Parties involving the Patent-in-Suit is contemplated in the foreseeable future. Accordingly, termination is appropriate because all disputes between the Parties regarding U.S. Pat. No.

10,045,383 have been resolved.

Filed concurrently herewith are Exhibits 2009-2013 (filed as “For Board and Parties Only”) containing true and correct copies of any and all agreements made in connection with or in contemplation with the requested termination. There are no other agreements, oral or written, between the parties made in connection with, or in contemplation of, the termination sought.

Under 35 U.S.C. § 317(a), “[a]n *inter partes* review instituted under this chapter 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.” This *inter partes* review is still in an early stage. Because all Parties request termination and the Board has not yet decided the merits of the proceeding, the Board should terminate the proceeding.

For the foregoing reasons, the Parties jointly request termination of IPR2024-00619 as to all Petitioners.

Jointly submitted,

Dated: February 27, 2025

/ Qi Tong /
Qi Tong (Reg. No. 74,292)
Attorney for Patent Owner

Dated: February 27, 2025

/ John D. Haynes /
John D. Haynes (Reg. No. 44,754)
Attorney for all Petitioners

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

The undersigned hereby certifies that the above document was served on February 27, 2025, by filing this document through P-TACTS as well as delivering a copy via electronic mail upon the following attorneys of record for Petitioners:

John D. Haynes
John.haynes@alston.com
David Frist
David.frist@alston.com
Michael C. Deane
Michael.deane@alston.com
Ross Barton
Ross.barton@alston.com
WA-Alston@alston.com

Date: February 27, 2025

/ Qi Tong /

Qi Tong (Reg. No. 74,292)
Attorney for Patent Owner