UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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GOOGLE LLC,

Petitioner,

v.

PROXENSE, LLC,

Patent Owner.

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Case No. IPR2024-00784
U.S. Patent No. 10,073,960

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**JOINT MOTION TO TERMINATE *INTER PARTES* REVIEW PROCEEDING PURSUANT TO 35 U.S.C. §317(a) and 37 C.F.R. § 42.74**

## STATEMENT OF PRECISE RELIEF REQUESTED

Pursuant to 35 U.S.C. §317(a), 37 C.F.R § 42.74, and the authorization provided by the Board on January 16, 2025, Petitioner Google LLC ("Petitioner") and Patent Owner Proxense, LLC ("Patent Owner") jointly request termination of this proceeding, IPR2024-00784 directed to U.S. Patent No. 10,073,960.

Petitioner and Patent Owner have settled their dispute regarding U.S. Patent No. 10,073,960, including both this proceeding and Patent Owner's assertion of U.S. Patent No. 10,073,960 in the related district court litigation, Proxense v. Google LLC and Google Payment Corp., Civil Action No. 6:23-cv-320 in the United States District Court for the Western District of Texas. The parties do not anticipate further litigation between them concerning U.S. Patent No. 10,073,960. The following related proceedings are currently before the Board:

- IPR2024-00782
- IPR2024-00783
- IPR2024-01399
- IPR2025-00075

There are strong public policy reasons to favor settlement between the parties and terminate this proceeding. Additionally, good cause exists to terminate this proceeding because the parties have settled their dispute regarding U.S. Patent No. 10,073,960 and the proceeding is still at an early stage. Terminating the

proceeding now would thus serve the interests of judicial economy as well as the mutual interest of the parties.

A true and correct copy of the parties' settlement agreement will be filed as Exhibit 1028, along with a joint request to treat the settlement agreement as business confidential information.

Date: January 23, 2025

Respectfully Submitted,

/David L. Hecht/
David L. Hecht
Counsel for Patent Owner
Proxense, LLC

/Erika H. Arner/
Erika H. Arner
Counsel for Petitioner
Google LLC

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing **JOINT MOTION TO TERMINATE *INTER PARTES* REVIEW PROCEEDING** was served on January 23, 2025, via email directed to counsel of record for the Patent Owner at the following:

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Dated: January 23, 2025

By: /Lisa C. Hines/
Lisa C. Hines
Case Manager

FINNEGAN, HENDERSON, FARABOW, GARRETT & DUNNER, L.L.P.