UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

Google LLC,
Petitioner

v.

Kove IO, Inc.,
Patent Owner

Case No. IPR2024-01021
U.S. Patent No. 7,233,978

JOINT MOTION TO TERMINATION PURSUANT TO 35 U.S.C. § 317

PATENT OWNER'S EXHIBIT LIST

Exhibit	Description
2001	Declaration of Dr. Michael T. Goodrich In Support of Patent Owner's Preliminary Response
2002	Declaration of Nancy Adams, EdD
2003	Curriculum Vitae of Nancy Adams, EdD
2004	Website for ETH Zürich Research Collection - ETH Zürich Jahresbericht 1993 (available at https://www.research-collection.ethz.ch/handle/20.500.11850/643838)
2005	ETH Zürich, *Jahresbericht* (1993)
2006	Website for ETH Zürich Research Collection - Distributed file organization with scalable cost/performance (available at https://www.research-collection.ethz.ch/handle/20.500.11850/68912)
2007	Metadata of Distributed File Organization With Scalable Cost/Performance in the ETH Zurich repository (available at https://www.research-collection.ethz.ch/handle/20.500.11850/68912?show=full)
2008	ETH Zurich Library Online Catalog Search Results
2009	ETH Zurich Library Online Catalog Search Result for Jahresbericht – Eidgenossische Technische Hochschule
2010	Marc Reocrd for Jahresbericht – Eidgenossische Technische Hochschule (available at https://eth.swisscovery.slsp.ch/discovery/fulldisplay?docid=alma99117224951305503&context=L&vid=41SLSP_ETH:ETH&lang=en&search_scope=DiscoveryNetwork&adaptor=Local%20Search%20Engine&tab=discovery_network&query=any,contains,1015-4191&mode=basic)
2011	Certified English Translation of ETH Zürich, *Jahresbericht* (1993)
2012	Norrie et al., *The Database Research Group at ETH Zurich* (available at https://dl.acm.org/doi/pdf/10.1145/181550.181567)
2013	Joint Claim Construction Chart in *Kove IO, Inc. v. Amazon Web Services, Inc.*, Case No. 1:18-cv-08175 (N.D. Ill. May 29, 2020) (Dkt. 382)

2014	Reexam Decision in *Ex Parte* Reexamination No. 90/014,552
2015	Settlement and License Agreement (CONFIDENTIAL)

Pursuant to 37 C.F.R § 42.74 and 35 U.S.C. § 317 and the authorization provided by the Board on January 13, 2025, Petitioner Google LLC ("Petitioner") and Patent Owner Kove IO, Inc. ("Patent Owner") jointly request termination of this proceeding, Case No. IPR2024-01021, directed to U.S. Patent No. 7,233,978 (the "'978 Patent").

Petitioner and Patent Owner have settled their dispute regarding the '978 Patent, including both this proceeding and Patent Owner's assertion of the '978 Patent in the related district court litigation, *Kove IO, Inc. v. Google*, No. 1:23-cv-04244. The parties do not anticipate further litigation between them concerning the '978 Patent. The following proceeding related to the '978 Patent is also currently before the Board and is the subject of a contemporaneous joint motion to terminate proceeding: Case No. IPR2024-01022. No other proceeding relating to this patent is before the Board.

Good cause exists to terminate this proceeding because the parties have settled their dispute regarding the '978 Patent and the proceeding is still at an early stage. The Board has not yet issued an institution decision. 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 2015, along with a joint motion to treat the settlement agreement as business

confidential information. No other agreements, written or oral, exist between the parties as to the ’978 Patent.

Dated: January 13, 2025

Respectfully submitted,

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Counsel for Patent Owner

CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the Joint Motion to Terminate Pursuant to 35 U.S.C. § 317 was served on January 13, 2025, by e-mail directed to counsel of record for the Patent Owner as follows:

Naveen Modi (Reg. No. 46,224)
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