

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

CELLCO PARTNERSHIP D/B/A VERIZON WIRELESS,
VERIZON CORPORATE SERVICES GROUP INC.,
T-MOBILE USA, INC., and AT&T SERVICES, INC.,
Petitioners,

v.

HEADWATER RESEARCH LLC,
Patent Owner.

IPR2024-01041
Patent 8,924,543 B2

JOINT MOTION TO TERMINATE *INTER PARTES* REVIEW

PATENT OWNER'S EXHIBIT LIST

No.	Description
Ex. 2001	<i>Cellco Partnership d/b/a/ Verizon Wireless et al. v. Headwater Research LLC</i> , IPR2024-01042, Paper 5 (IPR Petition) (PTAB June 20, 2024)
Ex. 2002	Email from counsel for Headwater Kristopher Davis to counsel for Verizon and T-Mobile re Preliminary Election of Asserted Claims
Ex. 2003	Email from counsel for Headwater Kristopher Davis to counsel for AT&T re Preliminary Election of Asserted Claims
Ex. 2004	Confidential Verizon License Agreement
Ex. 2005	Confidential T-Mobile License Agreement
Ex. 2006	Confidential AT&T License Agreement
Ex. 2007	Confidential License Agreement referenced in Petitioner Agreements
Ex. 2008	Joint Motion to Dismiss (Verizon Litigation)
Ex. 2009	Joint Motion to Dismiss (T-Mobile Litigation)
Ex. 2010	Joint Motion to Dismiss (AT&T Litigation)

I. STATEMENT OF THE PRECISE RELIEF REQUESTED

Patent Owner Headwater Research LLC (“Headwater”) has entered into a separate license agreement and joint motion to dismiss with each of Petitioners Cellco Partnership d/b/a Verizon Wireless, Verizon Corporate Services Group Inc. (“Verizon”), TMobile USA, Inc. (“TMobile”), and AT&T Services, Inc. (“AT&T”) (collectively, “Petitioners”), which license agreements and motions to dismiss resolve the disputes in the above-captioned *inter partes* review relating to U.S. Patent No. 8,924,543 (“Patent-in-Suit”). Pursuant to 35 U.S.C. § 317(a) and 37 C.F.R. §§ 42.72 and 42.74, the parties jointly request termination of this proceeding. As set forth in an e-mail dated April 22, 2025, the Board authorized the filing of the requested Joint Motion to Terminate this *inter partes* review.

As required under 35 U.S.C. § 317(b) and 37 C.F.R. § 42.74(b), a true copy of the agreements regarding dismissal and additional license agreements that resolve the disputes in the above-captioned *inter partes* review relating to the Patent-in-Suit as between Petitioners and Headwater are filed herewith as Exhibits 2004–2010. There are no other collateral agreements between the parties made in connection with, or in contemplation of, the termination sought.

Pursuant to 35 U.S.C. § 317(b) and 37 C.F.R. § 42.74(c), Petitioners and Headwater are concurrently filing a Joint Request to Keep Separate, which asks the

Board to treat each license agreement as business confidential information, and to keep it separate from the files of this proceeding and the files of the Patent-in-Suit.

II. Statement of Precise Relief Requested

The parties jointly request that the Board terminate the *inter partes* review of the Patent-in-Suit, IPR2024-01041.

III. Termination is Appropriate

Termination of this proceeding is proper. 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.” Because all parties request termination and the Board has not yet decided the merits of the proceeding, the Board should terminate the proceeding.

When there are no petitioners remaining in an *inter partes* review, the Board may terminate the proceeding entirely. 35 U.S.C. § 317(a); 37 C.F.R. § 42.72. Because Verizon, TMobile, and AT&T are the only petitioners in this *inter partes* review, all parties support termination of this proceeding. With no petitioners remaining in the proceeding and no final written decision on the merits, termination of this proceeding in its entirety is appropriate.

Headwater's claims against Petitioners involving the Patent-in-Suit have been dismissed, and Headwater and Petitioners do not contemplate any litigation or proceeding involving the Patent-in-Suit in the foreseeable future.

IV. Conclusion

Headwater and Petitioners have settled all disputes relating to the Patent-in-Suit, and the Board has not issued a final written decision deciding the merits of this proceeding. Accordingly, the parties respectfully request that the Board terminate this proceeding.

Dated: November 28, 2025

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

The undersigned hereby certifies that the above document was served on November 28, 2025, by filing this document through the PTACTS system as well as delivering a copy via electronic mail upon the following attorneys of record for the Petitioners:

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Respectfully submitted,

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