

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

REOLINK DIGITAL TECHNOLOGY CO., LTD.
Petitioner,

v.

KT IMAGING US, LLC.,
Patent Owner.

Case No. IPR2024-01155
Patent No. 8,004,602

MOTION TO WITHDRAW PETITION FOR *INTER PARTES* REVIEW

I. INTRODUCTION

As authorized by the Board on September 18, 2024, Reolink Digital Technology Co., Ltd. (“Petitioner”) files this motion to withdraw its Petition for *Inter Partes* Review of U.S. Patent No. 8,004,602 (“the ‘602 Patent”) and thereby terminate IPR2024-01155, which is in its preliminary phase. Patent Owner does not oppose this motion. In order to preserve the resources of the Board and the parties, Petitioner requests the withdrawal of its petition for *inter partes* review and termination of IPR2024-01155.

II. BACKGROUND

On July 3, 2024, Petitioner filed the petition in this proceeding, IPR2024-01155, which was accorded a filing date on July 3, 2024. *Reolink Digital Technology Co., Ltd.v. KT Imaging US, LLC* IPR2024-01155, Paper 3 at 1 (PTAB July 29, 2024). In response to Petitioner’s inquiry regarding this motion to withdraw, Patent Owner stated that it does not oppose the withdrawal of the petition in IPR2024-01155.” *See* Ex. 1034, September 14, 2024, responsive email from Patent Owner to Petitioner. Thus, Petitioner now requests withdrawal of this earlier filed petition pending in IPR2024-01155.

III. ARGUMENT

Good cause exists to allow Petitioner to withdraw its petition for *inter partes* review and thereby terminate IPR2024-01155 pursuant to 37 C.F.R. § 42.71(a) and

§ 42.72. IPR2024-01155, which was accorded a filing date on July 3, 2024, is in its very early preliminary stage. The Patent Owner has not yet filed a preliminary response. Nor has Board yet reached the merits or issued a decision on institution. Further, Patent Owner does not oppose the withdrawal of the petition. *See* Ex. 1034 at 1.

Accordingly, withdrawal of the petition at this very early stage of the proceeding would preserve both the Board's and the parties' resources and would further the objective of 37 C.F.R. § 42.1(b) in "secur[ing] the just, speedy, and inexpensive resolution of every proceeding." Furthermore, withdrawal of the petition would result in a just resolution, as Patent Owner does not oppose Petitioner's withdrawal of the earlier filed petition and would not be prejudiced by the termination of IPR2024-01155.

IV. CONCLUSION

In view of the foregoing, Petitioner requests for withdrawal of the instant petition for *inter partes* review and termination of IPR2024-01155 be granted.

Respectfully submitted,

Dated: September 19, 2024

By: /Timothy Bickham
Timothy Bickham
Lead Counsel for Reolink Digital
Technology Co., Ltd.
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that copy of the foregoing **Motion to Withdraw Petition for *Inter Partes* Review** was served electronically via email on September 19, 2024 in its entirety on the following:

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Date: September 19, 2024

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