

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

LENOVO (UNITED STATES) INC. and
MOTOROLA MOBILITY LLC,
Petitioner,

v.

HEADWATER RESEARCH LLC,
Patent Owner

Patent No. 10,749,700
Case No. IPR2024-01181

**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 September 15, 2025, Petitioners Lenovo (United States) Inc. and Motorola Mobility LLC (“Petitioners”) and Patent Owner Headwater Research LLC (“Headwater” or “Patent Owner”) jointly request termination of this proceeding, IPR2024-01181 directed to U.S. Patent No. 10,749,700.

Petitioner and Patent Owner have settled their dispute regarding U.S. Patent No. 10,749,700, including both this proceeding and Patent Owner’s assertion of U.S. Patent No. 10,749,700 in the related district court litigation, *Headwater Research LLC v. Motorola Mobility LLC et al.*, 4:23-cv-04496 in the United States District Court for the Northern District of California. The parties do not anticipate further litigation between them concerning U.S. Patent No. 10,749,700.

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. 10,749,700 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 1024, along with a joint request to treat the settlement agreement as business confidential information.

Date: September 16, 2025

Respectfully Submitted,

/James A. Milkey/

James A. Milkey
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/Joshua L. Goldberg/

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing **JOINT MOTION TO TERMINATE *INTER PARTES* REVIEW PROCEEDING** was served on September 16, 2025, via email directed to counsel of record for the Patent Owner at the following:

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Dated: September 16, 2025

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