

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAMSUNG ELECTRONICS CO., LTD., and
SAMSUNG ELECTRONICS AMERICA, INC.,

Petitioners

v.

CERENCE OPERATING COMPANY,

Patent Owner

Case IPR2024-01267

U.S. Patent No. 9,026,428

JOINT MOTION TO TERMINATE PROCEEDING

PETITIONERS' EXHIBIT LIST

Exhibit No.	Description
1001	U.S. Patent 9,026,428 (“’428Pat”)
1002	Declaration of Jean Renard Ward (“ <i>Ward</i> ”)
1003	Curriculum Vitae of Jean Renard Ward
1004	File History of U.S. Patent 9,026,428
1005	Certified Translation of JP 2006323502A (“ <i>Arai</i> ”)
1006	U.S. Patent 5,161,245 (“ <i>Fenwick</i> ”)
1007	EP0830668B1 (“ <i>Baker</i> ”)
1008	U.S. Patent 6,636,749 (“ <i>Holmes</i> ”)
1009	Excerpts from Microsoft Computer Dictionary (5th ed. 2002) (“ <i>Computer Dictionary</i> ”)
1010	Excerpts from Merriam-Webster’s Collegiate Dictionary (10th ed. 1996) (“ <i>Merriam-Webster’s Collegiate Dictionary</i> ”)
1011	U.S. 5,528,266 (“ <i>Arbeitman</i> ”)
1012	U.S. Pub. 2011/0310581 (“ <i>Yokote</i> ”)
1013	RAND REVIEW, Vol. 22, No. 1 (Fall 1998) (“ <i>Rand Review</i> ”)
1014	Tappert, IEEE TRANSACTIONS ON PATTERN ANALYSIS AND MACHINE INTELLIGENCE, The State of the Art in On-Line Handwriting Recognition, Vol. 12, No. 8 (Aug. 1990) (“ <i>Tappert</i> ”)
1015	U.S. 6,005,973 (“ <i>Seybold</i> ”)
1016	U.S. 7,158,678 (“ <i>Nagel</i> ”)
1017	U.S. 5,491,495 (“ <i>Ward</i> ’495”)
1018	Cover Pleading of Plaintiff Cerence Operating Company’s Disclosure of Asserted Claims and Infringement Contentions, Dated March 11, 2024

1019	Docket Control Order from <i>Cerence Operating Company v. Samsung Electronics Co., LTD, et al.</i> , No. 2:23-cv-0482-JRG-RSP (ECF 029) (E.D. Tex. April 16, 2024)
1020	Letter to James S. Tsuei from Jin-Suk Park, dated December 20, 2024
1021	U.S. 6,539,113 (“ <i>Kleeck</i> ”)
1022	Deposition Transcript of Eric Koskinen, Ph.D. dated July 9, 2025 (<i>Koskinen Depo.</i>)
1023	Deposition Transcript of Jonas Andersson dated July 16, 2025 (<i>Andersson Depo.</i>)
1024	Confidential Settlement Agreement Between Samsung and Cerence Operating Company

Petitioners Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. (“Petitioners”), and Patent Owner Cerence Operating Company (“Patent Owner”) have reached a settlement. Pursuant to 35 U.S.C. § 317(a) and 37 C.F.R. § 42.74, and the Board’s email of November 18, 2025, Petitioners and Patent Owner move to terminate the present *inter partes* review proceeding.

I. STATEMENT OF FACTS

Petitioners and Patent Owner have reached agreement (the “Settlement Agreement”) to resolve their disputes.

Pursuant to 37 C.F.R. § 42.74(b), the Settlement Agreement is in writing, and a true and correct copy is being filed as Confidential Exhibit 1024. The Settlement Agreement is being filed electronically with access to “Board Only.” A “*Joint Request to Treat Settlement Agreement as Business Confidential Information*” is being filed concurrently with this Joint Motion to Terminate Proceeding, to treat the Settlement Agreement as business confidential information and to keep it separate from the files of the involved patent pursuant to 35 U.S.C. § 317(b) and 37 C.F.R. § 42.74(c).

II. RELIEF REQUESTED

Termination of this *inter partes* review is requested, and all the parties respectfully submit that such termination is justified. “There are strong public policy reasons to favor settlement between the parties to a proceeding.” Consolidated Trial

Practice Guide 86 (Nov. 2019). “The Board expects that a proceeding will terminate after the filing of a settlement agreement, unless the Board has already decided the merits of the proceeding.” *Id.* (citing 35 U.S.C. §§ 317(a)).

The Board should terminate this proceeding as the Settling Parties jointly request, for the following reasons.

First, the parties have met the statutory requirement that they file a “joint request” to terminate before the Office “has decided the merits of the proceeding.” 35 U.S.C. § 317(a). Under section 317(a), an *inter partes* review shall be terminated upon such joint request “unless the Office has decided the merits of the proceeding before the request for termination is filed.” There are no other preconditions recited in 35 U.S.C. § 317(a).

Second, the parties have reached a settlement as to all the disputes in this proceeding and as to the ’428 patent. A true copy of the Settlement Agreement is filed concurrently herewith. *See* Confidential Ex. 1024. The parties request that the Settlement Agreement be treated as business confidential information and be kept separate from the files of this proceeding in accordance with 37 C.F.R. § 42.74(c). There are no other agreements, written or oral, between the parties made in connection with, or in contemplation of, the dismissal of the proceeding.

Third, termination would save significant further expenditure of resources by the parties. Termination upon settlement, as requested, would also further the purpose of *inter partes* review proceedings, which seek to provide an efficient and less costly alternative forum for patent disputes. Further, maintaining the proceeding would discourage further settlements, as patent owners in similar situations would have a strong disincentive to settle if they perceived that an *inter partes* review would continue regardless of a settlement.

III. Conclusion

For the foregoing reasons, Petitioners and Patent Owner respectfully request termination of this *inter partes* review.

Respectfully submitted,

Date: November 19, 2025

/Ali R. Sharifahmadian/
Ali R. Sharifahmadian (Reg. No. 48,202)
Counsel for Petitioners

Respectfully submitted,

Date: November 19, 2025

/ Qi Tong /
Qi (Peter) Tong (Reg. No. 74,292)
Counsel for Patent Owner

CERTIFICATE OF SERVICE

I certify that on November 19, 2025, I caused a true and correct copy of the foregoing Joint Motion to Terminate Proceeding to be served on the Patent Owner via electronic mail to Patent Owner's counsel of record below:

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