

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

CISCO SYSTEMS, INC.,

Petitioner

v.

CROGA INNOVATIONS LTD.,

Patent Owner

IPR2024-01283

U.S. Patent No. 11,223,601 B2

JOINT MOTION TO TERMINATE *INTER PARTES* REVIEW

Pursuant to 35 U.S.C. § 317(a) and 37 C.F.R. § 42.71(a), Petitioner Cisco Systems, Inc. (“Cisco”) and Patent Owner Croga Innovations Ltd. (“Croga”) (collectively, the “Parties”) jointly request termination of this *inter partes* review, IPR2024-01283, directed to U.S. Patent 11,223,601 (“the ‘601 patent”). The Board has discretion to “grant, deny, or dismiss any petition or motion.” 37 C.F.R. § 42.71(a). The Parties respectfully request that the Board grant this Motion because the Parties’ dispute with respect to the ‘601 Patent has been resolved.

Petitioner and Patent Owner have settled their dispute regarding the ‘601 patent, including both this proceeding and Patent Owner’s assertion of the ‘601 patent in the related district court litigation, *Croga Innovations Ltd. v. Cisco Systems, Inc.*, No. 2:24-cv-00065 (E.D. Tex.) (“the co-pending litigation”). See Ex.1044. The parties do not anticipate further litigation between them concerning the ‘601 patent. There are no related proceedings between the parties currently before the Board.

A true and correct copy of the parties’ Settlement Agreement will be filed as Ex.1042, along with an email exchange clarifying one item in the Settlement Agreement (Ex.1043) and a joint motion to treat the settlement agreement and email exchange as business confidential information.

The undersigned certify that there are no other collateral agreements or understandings, oral or written, between the parties made in connection with, or in

contemplation of, the termination of the present proceeding, and that Ex.1042 and Ex.1043 represent a true and accurate copy of the entire agreement between the parties that resolves the present proceeding.

On September 23, 2025, the Parties informed the Board of their agreement via email and requested authorization to file a joint motion to terminate the *inter partes* review with respect to both parties. As set forth in an email dated September 25, 2025, the Board authorized the filing of the requested joint motion to terminate this proceeding as to both parties. Accordingly, the Parties jointly request termination of the present proceeding.

Public policy favors terminating the present *inter partes* review proceeding. Congress and federal courts have expressed a strong interest in encouraging settlement in litigation. *See, e.g., Delta Air Lines, Inc. v. August*, 450 U.S. 346, 352 (1981) (“The purpose of [Fed. R. Civ. P.] 68 is to encourage the settlement of litigation.”); *Bergh v. Dept. of Transp.*, 794 F.2d 1575, 1577 (Fed. Cir. 1986) (“The law favors settlement of cases.”), *cert. denied*, 479 U.S. 950 (1986). The Federal Circuit places a particularly strong emphasis on settlement. *See Cheyenne River Sioux Tribe v. U.S.*, 806 F.2d 1046, 1050 (Fed. Cir. 1986) (noting that the law favors settlement to reduce antagonism and hostility between parties). Further, the Board’s Trial Practice Guide indicates that “[t]here are strong public policy reasons to favor settlement between the parties to a proceeding.” Consolidated Trial Practice Guide,

at 86 (Nov. 2019).

Terminating this *inter partes* review promotes the congressional goal of establishing a more efficient patent system by limiting unnecessary and counterproductive costs. *See* Changes to Implement Inter Partes Review Proceedings, Post-Grant Review Proceedings, and Transitional Program for Covered Business Method Patents, 77 Fed. Reg. 48,680 (Aug. 14, 2012). Permitting termination as to all parties provides certainty and fosters an environment that promotes settlements, creating a timely, cost-effective alternative to litigation.

Additionally, termination of this *Inter Partes* Review is appropriate as the Board has not yet “decided the merits of the proceeding.” Consolidated Trial Practice Guide, at 86. Cisco filed its petition for *inter partes* review on August 13, 2024. Croga filed its patent owner preliminary response on November 21, 2024, and the Board issued an institution decision granting institution of the *Inter Partes* Review on February 13, 2025. Croga filed its Response to the Petition on May 22, 2025. The parties have not submitted any further briefs in response to the petition. The parties have now settled their dispute and have reached agreement to terminate this *inter partes* review. The Board can conserve its resources through terminating the proceedings now, removing the need for the Board to render a final written decision. Furthermore, no other party’s rights will be prejudiced by the termination of this proceeding. The ’601 patent is not involved in any other pending litigation

in U.S. federal district courts, the International Trade Commission, or the U.S. Patent and Trademark Office.

Therefore, the Parties respectfully request termination of this *inter partes* review.

Respectfully submitted on behalf of both
parties,

Date: September 25, 2025

/Theodore M. Foster/

Theodore M. Foster
Counsel for Petitioner
Registration No. 57,456

PETITIONER’S UPDATED EXHIBIT LIST

September 25, 2025

Ex.1001	U.S. Patent No. 11,223,601 to Coleman et al.
Ex.1002	Prosecution History of U.S. Patent No. 11,223,601
Ex.1003	Declaration of Dr. Prashant Shenoy under 37 C.F.R. § 1.68
Ex.1004	Curriculum Vitae of Dr. Shenoy
Ex.1005	U.S. Patent No. 10,885,189 to Jeffries et al. (“Jeffries”)
Ex.1006	U.S. Patent Publication No. 2009/0292999 to LaBine et al. (“LaBine”)
Ex.1007	U.S. Patent Publication No. 2014/0282889 to Ishaya et al. (“Ishaya”)
Ex.1008	U.S. Patent Publication No. 2016/0048406 to Cucinotta et al. (“Cucinotta”)
Ex.1009	U.S. Patent Publication No. 2007/0136579 to Levy et al. (“Levy”)
Ex.1010	U.S. Patent No. 6,167,432 to Jiang (“Jiang”)
Ex.1011	Prevelakis, “Sandboxing Applications,” presented at USENIX Annual Technical Conference 2001 (“Prevelakis”)
Ex.1012	Goldberg, A Secure Environment for Untrusted Helper Applications (Confining the Wily Hacker), Proceedings of the Sixth USENIX UNIX Security Symposium (July 1996) (“Goldberg”)
Ex.1013	U.S. Patent No. 5,974,549 to Golan (“Golan”)
Ex.1014	U.S. Patent No. 5,987,611 to Freund (“Freund”)
Ex.1015	U.S. Patent Publication No. 2002/0178375 to Whittaker et al. (“Whittaker”)
Ex.1016	U.S. Patent No. 6,292,874 to Barnett (“Barnett”)
Ex.1017	U.S. Patent No. 5,067,072 to Talati et al. (“Talati”)
Ex.1018	U.S. Patent Publication No. 2006/0112384 to Frank et al. (“Frank”)
Ex.1019	U.S. Patent No. 8,326,872 to Zwilling et al. (“Zwilling”)

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Ex.1020	U.S. Patent Publication No. 2009/0259720 to Heins et al. (“Heins”)
Ex.1021	U.S. Patent No. 6,226,677 to Slemmer (“Slemmer”)
Ex.1022	U.S. Patent Publication No. 2013/0191880 to Conlan et al. (“Conlan”)
Ex.1023	U.S. Patent Publication No. 2013/0097706 to Titonis et al. (“Titonis”)
Ex.1024	U.S. Patent Publication No. 2015/0113544 to Yu (“Yu”)
Ex.1025	U.S. Patent Publication No. 2009/0225767 to Song et al. (“Song”)
Ex.1026	U.S. Patent Publication No. 2005/0223118 to Tucker et al. (“Tucker”)
Ex.1027	U.S. Patent Publication No. 2002/0010800 to Riley et al. (“Riley”)
Ex.1028	U.S. Statutory Invention Registration H1944 H to Cheswick et al. (“Cheswick”)
Ex.1029	U.S. Patent Publication No. 2011/0078550 to Nabutovsky (“Nabutovsky”)
Ex.1030	Complaint - <i>Croga Innovations Ltd. v. Cisco Systems, Inc.</i> EDTX-2-24-cv-00065
Ex.1031	Amended Docket Control Order - <i>Croga Innovations Ltd. v. Cisco Systems, Inc.</i> , No. 2-24-cv-00065, Dkt. 42 (E.D. Tex. July 18, 2024)
Ex.1032	Federal Court Trial Statistics – June 30, 2024
Ex.1033	List of patent trials scheduled before Judge Gilstrap (E.D. Tex.) on October 20, 2025
Ex.1034	Azab, SICE: A Hardware-Level Strongly Isolated Computing Environment for x86 Multi-core Platforms, (“Azab”)
Ex.1035	U.S. Patent Publication No. 2016/0088155 to Patel (“Patel”)
Ex.1036	U.S. Patent Publication No. 2013/0110999 to Kopasz et al. (“Kopasz”)
Ex.1037	U.S. Patent Publication No. 2016/0381072 to Todd et al. (“Todd”)
Ex.1038	Revised Infringement Contentions – <i>Croga Innovations Ltd. v. Cisco Systems, Inc.</i> , No. 2-24-cv-00065, Dkt. 52 (E.D. Tex. July 16, 2024)

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Ex.1039	2001 FREENIX Track Technical Program – Abstract for “Sandboxing Applications” (as captured by the Wayback Machine on January 26, 2004, https://web.archive.org/web/20040126143558/https://www.usenix.org/event/usenix01/freenix01/prevelakis.html)
Ex.1040	FREENIX Track: 2001 USENIX Annual Technical Conference (as captured by the Wayback Machine on September 15, 2003, https://web.archive.org/web/20030915151057/https://www.usenix.org/event/usenix01/freenix01/technical.html)
Ex.1041	“Using the Wayback Machine,” https://help.archive.org/help/using-the-wayback-machine/
Ex.1042 (NEW)	Settlement Agreement
Ex.1043 (NEW)	Email Exchange dated September 11, 2025
Ex.1044 (NEW)	Order - <i>Croga Innovations Ltd. v. Cisco Systems, Inc.</i> , No. 2-24-cv-00065, Dkt. 161 (E.D. Tex. September 24, 2025)

CERTIFICATE OF SERVICE

The undersigned certifies, under 37 C.F.R. § 42.6, that service was made on the Patent Owner as detailed below.

Date of service September 25, 2025

Manner of service Electronic Mail: bcooper@bc-lawgroup.com;
robert@auchterlaw.com; slindner@bc-lawgroup.com;
Croga_Counsel@bc-lawgroup.com

Documents served **Joint Motion to Terminate *Inter Partes* Review;
Petitioner's Updated Exhibit List; and Exhibits Ex.1042
– Ex.1044.**

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