

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAMSUNG ELECTRONICS CO., LTD.,
Petitioner,

v.

ANONYMOUS MEDIA RESEARCH HOLDINGS, LLC,
Patent Owner.

IPR2024-01348
Patent 10,572,896

JOINT MOTION TO WITHDRAW PETITION

Petitioner Samsung Electronics Co., Ltd. (“Samsung”) and Patent Owner Anonymous Media Research Holdings, LLC (“Patent Owner”) jointly move to withdraw the petition in the above-captioned *inter partes* review proceeding involving U.S. Patent No. 10,572,896 (“’896 patent”), without adverse judgment and without a decision on institution, thereby terminating this matter.

The petition (Paper 1) was filed on June August 26, 2024. Patent Owner’s preliminary response (Paper 11) was filed on December 27, 2024. A decision on institution has not been issued, and is expected by March 27, 2025. On February 20, 2025, the parties agreed to dismiss the ’896 patent from the related litigation with prejudice and filed a joint stipulation of partial dismissal. (EX1038). The district court granted the order for partial dismissal on February 24, 2025. (EX1039).

The parties informed the Board on February 20, 2025 of the joint stipulation and the parties’ intention to withdraw the petition in this IPR. On February 24, 2025, the Board granted authorization to file a joint motion to withdraw the petition in this IPR.

Petitioner and Patent Owner certify that there is no settlement agreement or understanding between the parties made in connection with, or in contemplation of, the dismissal of the petition for IPR, aside from the understanding to file the present

motion and the already-filed partial dismissal in district court.¹

Accordingly, Petitioner and Patent Owner jointly request that the Board dismiss the petition for IPR and terminate this matter, without adverse judgment and without a decision on institution. Such relief is appropriate as this IPR is in its pre-institution phase, and both parties are in agreement as to this outcome. The Board has not yet issued a decision with regards to whether to institute a proceeding, much less decided the merits of the proceedings.

“The Board may take up petitions or motions for decisions in any order, may grant, deny, or dismiss any petition or motion, and may enter any appropriate order.” 37 C.F.R. § 42.71. Efficiency and the interest of justice are best served by allowing the parties to jointly terminate an *inter partes review*, prior to institution of a trial, without advancing or diminishing either party’s position when the parties jointly move to do so.

¹ The parties note that this agreement does not extend to IPR2024-01349, IPR2024-01350, and IPR2025-00558, which are also pending between Petitioner and Patent Owner but involve different patents which are still part of the related district court litigation.

Respectfully submitted,

/Stephen D. Zinda/
Stephen D. Zinda (Reg. No. 67,272)
Counsel for Patent Owner

Date: February 25, 2025

Respectfully submitted,

/Naveen Modi/
Naveen Modi (Reg. No. 46,224)
Counsel for Petitioner

Date: February 25, 2025

CERTIFICATE OF SERVICE

I hereby certify that on February 25, 2025, I caused a true and correct copy of the foregoing Joint Motion to Withdraw Petition to be served electronically on counsel for Patent Owner at the following addresses:

james@chzfirm.com
stephen@chzfirm.com
paralegal@chzfirm.com

Dated: February 25, 2025

By: /Naveen Modi/
Naveen Modi (Reg. No. 46,224)
Counsel for Petitioner