

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

PALO ALTO NETWORKS, INC.
Petitioner

v.

CROGA INNOVATIONS LTD.
Patent Owner

Case IPR2024-01421
U.S. Patent No. 11,223,601

JOINT MOTION TO TERMINATE *INTER PARTES* REVIEW

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Patent Trial and Appeal Board
U.S. Patent & Trademark Office
P.O. Box 1450
Alexandria, VA 22313

PATENT OWNER'S UPDATED EXHIBIT LIST

Exhibit	Description
1001	U.S. Patent No. 11,223,601 to Coleman et al.
1002	U.S. Patent Prosecution History of U.S. Patent No. 11,223,601
1003	Declaration of Dr. Samrat Bhattacharjee
1004	Curriculum Vitae of Dr. Samrat Bhattacharjee
1005	U.S. Publication No. 2016/0306964 to Austin et al.
1006	U.S. Patent No. 8,640,187 to Walsh
1007	U.S. Patent No. 7,849,502 to Bloch et al.
1008	U.S. Publication No. 2016/0149863 to Walker et al.
1009	U.S. Patent No. 8,161,563 to Franco et al. ("Franco")
1010	"Productivity Tools," Cisco WebEx (2016)
1011	"Sharing and Presenting Tools," Cisco WebEx (2016)
1012	U.S. Patent No. 9,154,488 to Innes et al.
1013	"What is netfilter.org?," Netfilter (2016)
1014	Declaration of Nathaniel E. Frank-White regarding the authenticity and public accessibility of WebEx, Netfilter, and X2Go
1015	Kamp, P. & Watson, R., "Jails: Confining the omnipotent root.," <i>The FreeBSD Project</i> (2000)
1016	Bui, T., "Analysis of Docker Security," <i>Aalto University School of Science</i> (Jan. 13, 2015)
1017	Meggers, J., "Ringin in 2015, the Webex Way," <i>Cisco</i> (Jan. 14, 2015), accessed at https://blogs.cisco.com/collaboration/ringing-in-2015-the-webex-way#:~:text=3%20min%20read,Collaboration%20Applications%20team%20at%20Cisco.
1018	"Getting Started Guide: Cisco WebEx Meetings," <i>Cisco WebEx</i> , (2014)
1019	"Sharing and Presenting Tools Event Center," <i>Cisco WebEx University</i> (2014)

1020	Forouzan, B.A., “Data Communications and Networking” 5th ed. (2013)
1021	Love, R., “Linux Kernel Development,” 3d ed. (2010)
1022	John L. Hennessy & David A. Patterson, Computer Architecture (5th ed. 2012)
1023	The Associated Press, “Cisco to Buy an Online Conferencing Company,” <i>N.Y. Times</i> (Mar. 16, 2007), accessed at https://www.nytimes.com/2007/03/16/technology/16cisco.html
1024	“GoToMeeting User Guide,” Cisco (2013)
1025	Vomel, S. & Freiling, F.C., “A Survey of Main Memory Acquisition and Analysis Techniques for the Windows Operating System,” <i>Digital Investigation</i> , 1(8):3-22 (2011)
1026	McKeen, F., et al., “Innovative Instructions and Software Model for Isolated Execution,” <i>Intel Corporation</i> (2013)
1027	Wahbe, R., et al., “Efficient Software-Based Fault Isolation,” <i>SOSP '93: Proceedings of the fourteenth ACM Symposium on Operating Systems Principles</i> , pp. 203-216 (1993)
1028	Felter, W., et al., “An Updated Performance Comparison of Virtual Machines and Linux Containers,” <i>IBM</i> (Jul. 21, 2014)
1029	Price, D. & Tucker, A., “Solaris Zones: Operating System Support for Consolidating Commercial Workloads,” <i>Sun Microsystems, Inc.</i> (2004)
1030	Russinovich, M.E. & Solomon, D.E., “Microsoft Windows Internals,” 4th ed. (2005)
1031	Smalley, S., “Configuring the SELinux Policy,” <i>National Security Agency</i> (Feb. 2005)
1032	U.S. Patent No. 8,566,398 to Barnier et al. (“Barnier”)
1033	“Cisco WebEx Meetings Product Overview,” Cisco (Apr. 2015)
1034	Azab, A.M., et al., “SICE: A Hardware-Level Strongly Isolated Computing Environment for x86 Multi-Core Platforms,” <i>Association for Computing Machinery</i> (2011)
1035	<i>Croga Innovations Ltd. v. Palo Alto Networks, Inc.</i> , 2:24-cv-00208 (E.D. Tex.), Scheduling Order

1036	Settlement Agreement (Confidential)
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I. STATEMENT OF RELIEF REQUESTED

Palo Alto Networks, Inc. (“Petitioner”) and Croga Innovations Ltd. (“Patent Owner”) have entered into a confidential settlement agreement that resolves all underlying disputes between Petitioner and Patent Owner with respect to U.S. Patent No. 11,223,601 (“the ’601 patent”). A copy of the parties’ settlement agreement is being filed with this motion as Exhibit 1036 (the “Agreement”). The parties are concurrently filing a separate request that the Agreement be treated as business confidential information and be kept separate from the files of the involved patent, pursuant to 37 C.F.R. § 42.74(c).

Accordingly, pursuant to 37 C.F.R. § 42.74 and the authorization provided by the Board on April 16, 2025, the parties jointly request termination of this *inter partes* review proceeding in its entirety.

II. STATEMENT OF FACTS

On March 25, 2025, the parties entered into a confidential Agreement. *See* EX1036 (Confidential). Under the terms of the Agreement, the parties agreed to jointly seek termination of this proceeding.

III. ARGUMENT

A. Termination is appropriate.

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. Palo Alto Networks, Inc.*, 2:24-cv-00208 (E.D. Tex.), filed Mar. 22, 2024. The parties do not anticipate further litigation between them concerning the '601 patent.

Good cause exists to terminate this proceeding because the parties have settled their dispute regarding the '601 patent. The Board's Trial Practice Guide stresses that "[t]here are strong public policy reasons to favor settlement between the parties to a proceeding." Office Patent Trial Practice Guide, 77 Fed. Reg. 48,756, 46,768 (Aug. 14, 2012). Further, the proceeding is at an early stage. Terminating the proceeding now would serve the interests of judicial economy as well as the mutual interest of the parties.

B. Written Agreement

The parties represent that their entire agreement in connection with the termination of this proceeding is embodied in the Agreement, which has been made in writing. There are no collateral agreements or understandings made in connection with, or in contemplation of, the termination of this *inter partes* review.

A true and correct copy of the Agreement is filed herewith as Exhibit 1036. The Agreement has been filed for access by the "Parties and Board Only" due to the highly sensitive business confidential information it contains. The parties desire that the Agreement be maintained as business confidential information under 35 U.S.C. § 317(b) and 37 C.F.R. § 42.74(c), and a separate joint request to treat

the settlement agreement as business confidential information is being filed concurrently.

IV. CONCLUSION

Petitioner and Patent Owner respectfully request that the Board grant the parties' Joint Motion to Terminate this proceeding in its entirety.

Respectfully submitted,

STERNE, KESSLER, GOLDSTEIN & FOX PLLC

/Jonathan Tuminaro/

Jonathan Tuminaro (Reg. No. 61,327)
Counsel for Petitioner Palo Alto Networks, Inc.

Date: April 18, 2025

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Date: April 18, 2025

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CERTIFICATE OF SERVICE (37 C.F.R. § 42.6(e)(1))

The undersigned certifies that true and correct copies of the foregoing
JOINT MOTION TO TERMINATE *INTER PARTES* REVIEW and
EXHIBIT 1036 (CONFIDENTIAL) were served in their entireties electronically
via e-mail on April 18, 2025, on the following counsel for Patent Owner:

Brett Cooper (Lead Counsel) bcooper@bc-lawgroup.com
Robert A. Auchter (Back-Up Counsel) robert@auchterlaw.com
Seth Lindner (Back-Up Counsel) slindner@bc-lawgroup.com
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Respectfully submitted,

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Date: April 18, 2025

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