

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

KANGXI COMMUNICATION TECHNOLOGIES (SHANGHAI) CO., LTD.

Petitioner,

v.

SKYWORKS SOLUTIONS, INC.

Patent Owner.

Case No. IPR2024-01456

U.S. Patent No. 9,450,579

JOINT MOTION TO TERMINATE PROCEEDING

Pursuant to 35 U.S.C. § 317(a), 37 C.F.R. §§ 42.72 and 42.74, and the Board’s email of May 4, 2026, Petitioner Kangxi Communication Technologies (Shanghai) Co., Ltd. (“KCT” or “Petitioner”) and Patent Owner Skyworks Solutions, Inc. (“Skyworks” or “Patent Owner”) (collectively, the “Parties”) jointly move to terminate the above-captioned proceeding.

I. STATEMENT OF FACTS

As reflected in Exhibit 2006 filed herewith, the Parties have reached an agreement to jointly move to terminate the above-captioned *inter partes* review (“IPR”) of U.S. Patent No. 9,450,579 (“the ’579 patent”) and co-pending IPR2024-01457 of related U.S. Patent No. 9,148,194 (“the ’194 patent”). Prior to reaching this agreement, the Parties jointly moved to dismiss the related ITC proceeding (*In the Matter of Certain Wireless Front-End Modules, Devices Containing the Same, and Components Thereof*, Inv. No. 337-TA-1413^{1,2}), which the ITC granted, and the

¹ Please note some mandatory notices also referred to this same ITC proceeding by its pre-investigation number, Inv. No. 337-TA-3762.

² As reported at the oral hearing in this IPR proceeding (Paper 26, 32:18-33:1, 31:19-32:9), Patent Owner had voluntarily dismissed the ’579 patent and the ’194 patent from this ITC proceeding prior to the ITC hearing and ITC initial

Parties jointly moved to dismiss the related district court proceeding (*Skyworks Solutions, Inc. v. Kangxi Communication Technologies Shanghai Co., Ltd et al.*, CDCA-8-24-cv-00974³), which the district court granted.

Pursuant to 35 U.S.C. § 317(b) and 37 C.F.R. § 42.74(b), Petitioner and Patent Owner submit a true copy of each of (1) the Parties' counsels' email exchange reflecting the Parties' agreement to jointly move to terminate the above-captioned IPR and IPR2024-01457 (filed herewith as Exhibit 2006), (2) the Joint Motion to Terminate the Investigation filed in the related ITC proceeding in its entirety (filed herewith as Exhibit 2007), and (3) the Joint Motion to Dismiss filed in the related district court proceeding in its entirety (filed herewith as Exhibit 2008). The Parties certify that the filed exhibits reflect the complete agreement or understanding between the Parties and that there are no other collateral agreements, oral or written, between the Parties made in connection with, or in contemplation of, the termination

determination. *See also* Exhibit 2009 (ITC Determination to Grant Joint Motion to Terminate Investigation) at 2.

³ As reported at the oral hearing in this IPR proceeding (Paper 26, 32:18-21), this district court proceeding was previously stayed pending the outcome of the related ITC proceeding.

sought. For completeness, the Parties also submit a true copy of the Notice of the ITC Commission Determination to Grant the Joint Motion to Terminate in its entirety (filed herewith as Exhibit 2009), and the Order Granting the Joint Motion to Dismiss the district court proceeding in its entirety (filed herewith as Exhibit 2010).

II. RELIEF REQUESTED

Termination of this *inter partes* review is requested, and 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 (Nov. 2019) at 86. “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 Parties jointly request, for the following reasons.

First, KCT and Skyworks 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, in addition to agreeing to file this joint request to terminate the above-captioned IPR and related IPR2024-01457, KCT and Skyworks jointly moved to terminate/dismiss the related ITC and district court proceedings, which have been granted. Pursuant to 35 U.S.C. § 317(b) and 37 C.F.R. § 42.74(b), the agreements made in connection with, or in contemplation of, the termination of this IPR proceeding (and the related ITC and district court proceedings) are in writing, and true and correct copies are being filed concurrently herewith as Exhibits 2006 - 2008. The Parties certify that there are no other agreements, oral or written, between the Parties made in connection with, or in contemplation of, the termination of this proceeding.

Third, termination would save further expenditure of resources by the Parties and Board. Termination, 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 resolutions, as patent owners in similar situations would have a strong disincentive to dismiss related district court and ITC proceedings if they perceived that an *inter partes* review would continue regardless of agreements to move to terminate such IPR proceedings.

III. CONCLUSION

For the foregoing reasons, KCT and Skyworks respectfully request termination of this *inter partes* review.

Dated: May 4, 2026

Respectfully submitted,

By:

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PATENT OWNER'S UPDATED TABLE OF EXHIBITS

Exhibit	Description
2001	Declaration of Dr. David Wentzloff
2002	CV of Dr. David Wentzloff
2003	Deposition Transcript of Dr. Larson
2004	Certified English Translation of Japanese Patent Publication No. JP 2006-121217 (Ex-1006)
2005	McGraw-Hill Dictionary of Electrical and Computer Engineering (6 th Ed. 2003)
2006	Email exchange regarding IPR2024-01456, -01457
2007	Joint Motion to Terminate ITC-337-TA-1413
2008	Joint Motion to Dismiss CDCA-8-24-cv-00974
2009	Notice of the ITC Commission Determination to Grant the Joint Motion to Terminate ITC-337-TA-1413
2010	Order Granting the Joint Motion to Dismiss CDCA-8-24-cv-00974

CERTIFICATE OF SERVICE

I hereby certify that, on May 4, 2026, I caused a true and correct copy of the following materials:

- Joint Motion to Terminate Proceeding
- Patent Owner's Updated Table of Exhibits
- Exhibits 2006-2010

to be served via e-mail, as consented to by Petitioner, on the following attorneys of record:

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