

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

GOOGLE LLC and
LENOVO (UNITED STATES) INC.,
Petitioners,

v.

ERICSSON AB,
Patent Owner.

Case IPR2025-00004
Patent No. 11,122,313

**JOINT MOTION TO TERMINATE CO-PETITIONER
LENOVO (UNITED STATES) INC. ONLY**

EXHIBIT LIST

LIST OF NEWLY FILED EXHIBITS

The following exhibits are being filed with this Joint Motion to Terminate Co-Petitioner Lenovo (United States) Inc. Only and concurrent Joint Request to Treat the Lenovo Settlement Agreement and the Lenovo Arbitration Agreement as Business Confidential Information:

Exhibit No.	Description
2002	Confidential Settlement And Patent License Agreement (“Lenovo Settlement Agreement”)
2003	Confidential Arbitration Agreement (“Lenovo Arbitration Agreement”)

LIST OF PREVIOUSLY FILED EXHIBITS

Exhibit No.	Description
2001	Declaration of Kayvan B. Noroozi in Support of Motion for Admission <i>Pro Hac Vice</i>

I. STATEMENT OF RELIEF REQUESTED

Co-Petitioner Lenovo (United States), Inc. (“Lenovo”) and Patent Owner Ericsson AB (“Ericsson”) (collectively “the Settled Parties”) have reached a settlement.¹ Pursuant to 35 U.S.C. § 317, 37 C.F.R. §§ 42.72 and 42.74, and authorization provided by the Board on April 14, 2025, the Settled Parties jointly move for termination of Lenovo as a Co-Petitioner in this proceeding (IPR2025-00004) (the “Proceeding”), without prejudice to either Lenovo or Ericsson. The Settled Parties are concurrently filing a true copy of the Lenovo Settlement Agreement (Confidential Exhibit 2002) and the Lenovo Arbitration Agreement (Confidential Exhibit 2003) along with a request that these exhibits be kept separate and treated as “business confidential information” pursuant to 35 U.S.C. § 317(b) and 37 C.F.R. § 42.74(c) and “Board’s Eyes Only” as authorized in the Board’s April 15, 2025 email communication. There are no other agreements, oral or written, between the Settled Parties made in connection with, or in contemplation of, the termination of Lenovo’s participation.

II. JOINT MOTION TO TERMINATE CO-PETITIONER LENOVO ONLY

Termination of Co-Petitioner Lenovo is requested, and the Settled Parties

¹ Co-Petitioner Google LLC and Ericsson have not reached a settlement. Therefore, this IPR will continue without Lenovo.

Case IPR2025-00004
JOINT MOTION TO TERMINATE CO-PETITIONER
LENOVO (UNITED STATES) INC. ONLY

respectfully submit that such termination of Lenovo as a Co-Petitioner is justified. Lenovo and Ericsson have met the statutory requirement that they file a “joint request” to terminate Lenovo as a Co-Petitioner before the Office “has decided the merits of the proceeding.” 35 U.S.C. § 317(a). For at least these reasons, termination of Lenovo as a Co-Petitioner is proper under 35 U.S.C. § 317 and 37 C.F.R. § 42.74.

Respectfully submitted,

Date: April 23, 2025

/Anant K. Saraswat/
Anant K. Saraswat
Wolf, Greenfield & Sacks, P.C.
600 Atlantic Avenue Boston, MA
02210-2206
Telephone: 617-646-8000
Facsimile: 617-646-8646
Attorney for Co-Petitioner Lenovo

Date: April 23, 2025

/Kayvan Noroozi/
Kayvan Noroozi
Peter C. Knops, Reg. No. 37,659
NOROOZI PC
11601 Wilshire Blvd., Suite 2170
Los Angeles, CA 90025
Attorney for Patent Owner

CERTIFICATION OF SERVICE

The undersigned hereby certifies that the foregoing **JOINT MOTION TO
TERMINATE CO-PETITIONER LENOVO (UNITED STATES) INC.**

ONLY was served electronically via e-mail on April 23, 2025, on the following
counsel of record for Petitioner:

Scott McKeown, Reg. No. 42866
SMcKeown-PTAB@wolfgreenfield.com
Anant K. Saraswat, Reg. No. 76,050
ASaraswat-PTAB@wolfgreenfield.com
Turhan F. Sarwar, pending admission pro hac vice
TSarwar-PTAB@wolfgreenfield.com
Elizabeth A. DiMarco, pending admission pro hac vice
Elizabeth.DiMarco@wolfgreenfield.com

Wolf, Greenfield & Sacks, P.C.
600 Atlantic Avenue Boston, MA 02210-2206
Telephone: 617-646-8000
Facsimile: 617-646-8646

/Kayvan Noroozi/
Kayvan Noroozi
NOROOZI PC
11601 Wilshire Blvd., Suite 2170
Los Angeles, CA 90025
Tel.: 310-975-7074
Counsel for Patent Owner

Date: April 23, 2025