UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

KOKI HOLDINGS AMERICA LTD.

Petitioner

v.

KYOCERA SENCO INDUSTRIAL TOOLS, INC.

Patent Owner.

IPR2025-00261
U.S. PATENT NO. 11,034,007

JOINT MOTION TO TERMINATE

TABLE OF EXHBITS

Exhibit	Description
1001	U.S. Patent No. 11,034,007 to Leimbach ("the '007 patent")
1002	Prosecution History of the '007 patent
1003	Declaration of Dr. Glenn E. Vallee
1004	U.S. Patent No. 3,150,488 ("Haley")
1005	U.S. Patent No. 5,503,319 ("Lai")
1006	U.S. Patent No. 3,924,692 ("Saari")
1007	U.S. Patent No. 3,913,685 ("Enstrom")
1008	U.S. Patent No. 5,720,423 ("Kondo")
1009	U.S. Patent Publication No. 2006/0180631 ("Pedicini")
1010	U.S. Patent No. 4,834,278 ("Lin")
1011	U.S. Publication No. 2006/0261127 ("Wolf")
1012	U.S. Patent No. 3.636,707 ("Saari '707")
1013	U.S. Patent No. 4,953,774 ("Lai '774")
1014	U.S. Patent No. 860,536 ("Ellingham")
1018	Office Action dated February 4, 2021 in U.S. Patent Application No. 17/090,018

1019	Response to Office Action dated March 24, 2021 in U.S. Patent Application No. 17/090,018
1101	**Confidential Settlement Agreement**
1102	Trials Email Authorizing Joint Request to File Motions to Terminate and Requests to Treat the Settlement Agreement as Business Confidential Information (October 28, 2025)

I. RELIEF REQUESTED

Pursuant to 35 U.S.C. § 317(a) and 37 C.F.R. §§ 42.71 and 42.74, and the Board's authorization email of October 28, 2025 (Ex. 1102), Petitioner Koki Holdings America Ltd. ("Petitioner") and Patent Owner Kyocera Senco Industrial Tools, Inc. ("Patent Owner") jointly move to terminate IPR2025-00261 ("the Present IPR Proceeding") in its entirety.

II. STATEMENT OF FACTS

Petitioner and Patent Owner entered into an agreement that was fully executed on October 22, 2025 ("Settlement Agreement"), which settled the parties' disputes involving the '007 Patent. Pursuant to 37 CFR § 42.74(b), the Settlement Agreement is in writing. The parties are concurrently filing a true copy of the settlement agreement as Confidential Exhibit 1101, along with a Joint Request to Treat Settlement Agreement as Business Confidential Information under 37 C.F.R. § 42.74(c).

Petitioner and Patent Owner certify that no collateral agreements or understandings exist in connection with, or in contemplation of, dismissal and termination of the Present IPR Proceeding or any of the Related IPRs beyond the settlement agreement filed as Confidential Exhibit 1101.

III. GOOD CAUSE JUSTIFIES TERMINATION OF THE PRESENT IPR PROCEEDING

The Board has recognized that "[t]here are strong public policy reasons to favor settlement between the parties to a proceeding," and as such, the Board "expects" a proceeding to be terminated at the parties' request "unless the Board has already decided the merits of the proceeding." Consolidated Trial Practice Guide, November 2019, p. 86 (citing 35 U.S.C. § 317(a) ("An inter partes review instituted under this chapter shall be terminated with respect to any petitioner upon the joint request of the petitioner and the patent owner, unless the Office has decided the merits of the proceeding before the request for termination is filed."). In view of the agreement that settled the parties' disputes involving the '007 Patent, Petitioner and Patent Owner respectfully submit that termination of the Present IPR Proceeding is warranted to conserve resources of the Board, to conserve resources of the parties, and to promote a speedy and just resolution of the Present IPR Proceeding. Here, the merits of the Present IPR Proceeding have not been decided, let alone considered in any decision by the Board. Accordingly, good cause exists to terminate the Present IPR Proceeding in its entirety.

IV. CONCLUSION

For the above reasons, Petitioner and Patent Owner jointly and respectfully request that the Board terminate the Present IPR Proceeding.

Date: October 29, 2025

Respectfully submitted,

/S/ Amol A. Parikh
Amol A. Parikh

Counsel for Petitioner

/S/ Daniel H. Shulman
Daniel H. Shulman

Counsel for Patent Owner

CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6(e)(4), the undersigned certifies that on October 29, 2025, a complete and entire copy of this Joint Motion to Terminate was provided via email, to Patent Owner by serving the email correspondence addresses of record as follows:

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