

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

VIDEOAMP INC.,
Petitioner,

v.

THE NIELSEN COMPANY (US), LLC,
Patent Owner.

IPR2025-00556
Patent 11,871,058

JOINT MOTION TO TERMINATE

Petitioner and Patent Owner jointly request that this IPR proceeding be terminated. Good cause exists to grant this joint Motion pursuant to 37 C.F.R. §§ 42.71(a) and 42.72.

Here, this IPR proceeding is still in the early stages (prior to a Patent Owner Preliminary Response being filed). Termination at this early stage would be beneficial for reducing costs and promoting efficient realization of the Board's resources. As the Board has recognized, early termination by petition withdrawal—particularly when unopposed—promotes efficiency and substantially conserves the Board's and parties' resources. *Reolink Digital Technology Co., Ltd. v. KT Imaging USA, LLD*, IPR2024-01154, Paper 6, 2 (P.T.A.B. Sep. 23, 2024) (“determin[ing] that it is appropriate to grant Petitioner's Motion to withdraw the Petitions and terminate the proceedings” where “Patent Owner ... does not oppose the withdrawal of the Petition” and “proceeding[s] are in their preliminary stages, and no decisions on whether to institute *inter partes* review have been made.”); *see also DirectTV, LLC v. Entropic Communications, LLC*, IPR2024-01063, Paper 8, 2-3 (P.T.A.B. Oct. 17, 2024).

Further, termination of the instant IPR is appropriate because all pending disputes between the parties concerning the '058 Patent have been resolved in the district court litigation, and the concurrent litigation has been dismissed. Ex. 2001, p. 13. The time for appeal has passed and no appeal was filed. Under such

circumstances, withdrawal serves the interests of the parties and the Board and furthers the objectives of 37 C.F.R. § 42.1(b) in “secur[ing] the just, speedy, and inexpensive resolution of every proceeding.”

For at least the foregoing reasons, Petitioner and Patent Owner request granting of this motion.

Respectfully submitted,

Date: June 12, 2025

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CERTIFICATE OF SERVICE

Pursuant to 37 CFR § 42.6(e)(4), the undersigned certifies that on June 12, 2025, a complete and entire copy this joint motion to terminate was provided via email, to the Patent Owner by serving the correspondence address of record as follows:

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