

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

OTTER PRODUCTS, LLC,

Petitioner,

v.

SAFETRAY PRODUCTS, LTD.,

Patent Owner.

Case IPR2025-0622
U.S. Patent No. 10,113,691

JOINT MOTION TO TERMINATE

Petitioner, Otter Products, LLC (“Otter”) and Patent Owner, SafeTray Products, Ltd. (“SafeTray”) jointly request termination of *inter partes* review IPR2025-0622 with respect to Otter pursuant to 35 U.S.C. § 317 and 37 C.F.R.

¶ 42.72. No other petitioners remain in the proceedings.

Petitioner and Patent Owner have reached an agreement resolving the dispute in this *inter partes* review.

As required under 35 U.S.C. § 317(b) and 37 C.F.R. ¶ 42.72(b), attached hereto as **Exhibit 1024** is a copy of the Entry of Judgment entered in *SafeTray Products, Ltd. v. Otter Products, LLC*, Case No. 1:24-cv-01119 (D. Colo. Apr. 23, 2024) pursuant to an offer of judgment, and attached as **Exhibit 1025** is a true copy of a written Settlement Agreement resolving the dispute in the above captioned *inter partes* review and the related litigation. *See* EX1025. There are no other agreements, oral or written, between the Parties made in connection with, or in contemplation of, the termination of the proceeding other than the agreements filed herewith.

Petitioner and Patent Owner hereby request that the Settlement Agreement filed herewith as Exhibit 1025 shall be treated as business confidential information, shall be kept separate from the file of the involved patent, and shall be made available only to federal government agencies on written request, or to any person

on a showing of good cause pursuant to 35 U.S.C. § 317(b) and 37 C.F.R.
§ 42.74(c).

Conclusion

The parties jointly request termination of IPR2025-0622.

Respectfully submitted,

Date: May 16, 2025

/Andrew J. Lagatta/
Andrew J. Lagatta
Registration No. 62,529
150 S Fifth Street, Suite 2200
Minneapolis, Minnesota 55402
612.332.5300

Attorneys for Petitioner
Otter Products, LLC

And

/Erik N. Lund/
Erik N. Lund
Registration No. 77,473
Joseph J. Zito
Registration No. 32,076
DNL ZITO
1250 Connecticut Avenue, NW, Suite
700 Washington, DC 20036
202-466-3500
elund@dnlzito.com
jzito@dnlzito.com

Attorneys for Patent Owner
SafeTray Products Ltd.