

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

MICROSOFT CORP.,
Petitioner,

v.

VIRTAMOVE, CORP.,
Patent Owner.

Case No. IPR2025-00849
Patent No. 7,519,814

JOINT MOTION TO TERMINATE

Mail Stop Patent Board
Patent Trial and Appeal Board
U.S. Patent and Trademark Office
P.O. Box 1450
Alexandria, VA 22313-1450

INDEX OF EXHIBITS

Exhibit	Description
1001	U.S. Patent No. 7,519,814 (“814 patent”)
1002	Prosecution History of U.S. Patent No. 7,519,814
1003	Declaration of Samrat Bhattacharjee, Ph.D. (“Bhattacharjee”), (EX. 1003 from IPR-2025-00487)
1004	Curriculum Vitae of Samrat Bhattacharjee, Ph.D.
1005	U.S. Patent No. 7,117,495 (“Blaser”)
1006	U.S. Patent Application Publication No. 20020066022 (“Calder”)
1007	U.S. Patent No. 6,931,449 (“Schmidt-449”)
1008	U.S. Patent Application Publication No. 20020095479 (“Schmidt-479”)
1009	U.S. Patent Application Publication No. 20020133529 (“Schmidt-529”)
1010	U.S. Patent Application Publication No. 20020124072 (“Tormasov”)
1011	U.S. Patent Application Publication No. 20010009425
1012	U.S. Patent Application Publication No. 20010018708
1013	U.S. Patent Application Publication No. 20010047472
1014	U.S. Patent Application Publication No. 20010056572
1015	U.S. Patent Application Publication No. 20010029605
1016	U.S. Patent Application Publication No. 20020023158
1017	U.S. Patent Application Publication No. 20020052727
1018	U.S. Patent Application Publication No. 20020143795
1019	U.S. Patent Application Publication No. 20020156612
1020	U.S. Patent Application Publication No. 20020156877
1021	U.S. Patent Application Publication No. 20020174215
1022	U.S. Patent Application Publication No. 20020188718
1023	U.S. Patent Application Publication No. 20020194394
1024	U.S. Patent Application Publication No. 20020194488
1025	U.S. Patent Application Publication No. 20030009408
1026	U.S. Patent Application Publication No. 20030014381
1027	U.S. Patent Application Publication No. 20030014466
1028	U.S. Patent Application Publication No. 20030018717
1029	U.S. Patent Application Publication No. 20030023839
1030	U.S. Patent Application Publication No. 20030041173
1031	U.S. Patent Application Publication No. 20030093688
1032	U.S. Patent Application Publication No. 20030097464

Exhibit	Description
1033	U.S. Patent No. 6,467,052
1034	U.S. Patent Application Publication No. 20030140179
1035	U.S. Patent Application Publication No. 20030154221
1036	U.S. Patent No. 7,159,184
1037	U.S. Patent No. 7,103,745
1038	U.S. Patent No. 6,263,440
1039	U.S. Patent Application Publication No. 20040190534
1040	U.S. Patent No. 7,356,771
1041	U.S. Patent No. 5,903,753
1042	U.S. Patent No. 4,685,125
1043	U.S. Patent No. 5,406,644
1044	U.S. Patent No. 5,421,009
1045	U.S. Patent No. 5,568,630
1046	U.S. Patent No. 5,640,562
1047	U.S. Patent No. 5,657,221
1048	U.S. Patent No. 5,675,831
1049	U.S. Patent No. 5,742,829
1050	U.S. Patent No. 4,742,450
1051	U.S. Patent No. 5,761,669
1052	U.S. Patent No. 5,784,555
1053	U.S. Patent No. 5,835,765
1054	U.S. Patent No. 6,044,465
1055	U.S. Patent No. 6,122,744
1056	U.S. Patent No. 6,195,650
1057	U.S. Patent No. 6,321,323
1058	U.S. Patent No. 6,363,409
1059	U.S. Patent No. 6,453,470
1060	U.S. Patent No. 6,567,767
1061	U.S. Patent No. 6,732,359
1062	U.S. Patent No. 6,874,148
1063	U.S. Patent No. 6,985,937
1064	U.S. Patent No. 7,140,015
1065	U.S. Patent No. 7,185,192
1066	U.S. Patent No. 7,454,440
1067	U.S. Patent No. 8,209,680
1068	U.S. Patent No. 5,926,636
1069	U.S. Patent No. 5,218,530
1070	U.S. Patent No. 6,134,593
1071	U.S. Patent No. 6,918,038

Exhibit	Description
1072	U.S. Patent Application Publication No. 20040034623
1073	U.S. Patent No. 7,461,148
1074	U.S. Patent No. 7,136,800
1075	PCT Application Publication No. WO2002056156
1076	Kamp et al., “Jails: Confining the omnipotent root,” Proceedings of the 2nd International SANE Conference (Vol. 43, p. 116) (2000)
1077	Prevelakis et al., “Sandboxing Applications,” USENIX Annual Technical Conference, FREENIX Track (pp. 119-126) (2001)
1078	Plaintiff VirtaMove Corp.’s Supplemental Preliminary Disclosure of Asserted Claims and Infringement Contentions, in <i>VirtaMove, Corp. v. Google LLC</i> , 7:24-cv-00033-DC-DTG (W.D. Tex.) (Sept. 06, 2024)
1079	Chart re: ’814 Patent accompanying Plaintiff VirtaMove Corp.’s Supplemental Preliminary Disclosure of Asserted Claims and Infringement Contentions, in <i>VirtaMove, Corp. v. Google LLC</i> , 7:24-cv-00033-DC-DTG (W.D. Tex.) (Sept. 6, 2024)
1080	First Amended Complaint for Patent Infringement Against Google LLC in <i>VirtaMove, Corp. v. Google LLC</i> , 7:24-cv-00033-DC-DTG (W.D. Tex.) (May 21, 2024)
1081	Scheduling Order in <i>VirtaMove, Corp. v. Google LLC</i> , 7:24-cv-00033-DC-DTG (W.D. Tex.) (June 17, 2024) (ECF 34)
1082	Federal Court Management Statistics-Profiles, U.S. District Courts-Combined Civil and Criminal (September 2024)
1083	U.S. Patent Application Publication No. 20020095500 (“Schmidt-500”)
1084	U.S. Patent Application Publication No. 20050169073
1085	U.S. Provisional Application No. 60/533,388
1086	U.S. Patent No. 5,412,808
1087	Order Granting Defendant Google LLC’s Motion to Transfer Venue to the Northern District of California in <i>VirtaMove, Corp. v. Google LLC</i> , 7:24-cv-00033-DC-DTG (W.D. Tex.) (Jan. 22, 2025)
1088	Microsoft’s Computer Dictionary (5th ed. 2002) (excerpt)
1089	U.S. Patent No. 6,381,742
1090	U.S. Patent Application Publication No. 20030035430
1091	U.S. Patent No. 6,477,624
1092	U.S. Patent No. 5,931,947
1093	U.S. Patent No. 6,148,335
1094	U.S. Patent No. 6,944,790
1095	U.S. Patent No. 6,014,135
1096	U.S. Patent No. 6,282,660

Exhibit	Description
1097	U.S. Patent Application Publication No. 20040153709
1098	U.S. Patent Application Publication No. 20050050389
1099	U.S. Patent Application Publication No. 20040225952
1100	Google LLC’s Proposed Claim Terms for Construction in <i>VirtaMove, Corp. v. Google LLC</i> , 7:24-cv-00033-DC-DTG (W.D. Tex.) (Oct. 1, 2024)
1101	Plaintiff’s Disclosure of Proposed Claim Constructions in <i>VirtaMove, Corp. v. Google LLC</i> , 7:24-cv-00033-DC-DTG (W.D. Tex.) (Oct. 1, 2024)
1102	Google LLC’s Opening Claim Construction Brief in <i>VirtaMove, Corp. v. Google LLC</i> , 7:24-cv-00033-DC-DTG (W.D. Tex.) (Oct. 24, 2024)
1103	Plaintiff’s Responsive Claim Construction Brief in <i>VirtaMove, Corp. v. Google LLC</i> , 7:24-cv-00033-DC-DTG (W.D. Tex.) (Nov. 12, 2024)
1104	Google LLC’s Reply Claim Construction Brief in <i>VirtaMove, Corp. v. Google LLC</i> , 7:24-cv-00033-DC-DTG (W.D. Tex.) (Nov. 26, 2024)
1105	Plaintiff’s Sur-Reply Claim Construction Brief in <i>VirtaMove, Corp. v. Google LLC</i> , 7:24-cv-00033-DC-DTG (W.D. Tex.) (Dec. 13, 2024)
1106	Joint Claim Construction Statement in <i>VirtaMove, Corp. v. Google LLC</i> , 7:24-cv-00033-DC-DTG (W.D. Tex.) (Dec. 18, 2024)
1107	U.S. Provisional Application No. 60/502,619
1108	U.S. Patent Application Publication No. 20050188268
1109	U.S. Patent Application Publication No. 20020140743
1110	U.S. Patent Application Publication No. 20020143906 (“Tormasov-906”)
1111	U.S. Patent No. 7,076,633 (“Tormasov-633”)
1112	U.S. Patent Application Publication No. 20060089950 (“Tormasov-950”)
1113	U.S. Patent No. 7,222,132 (“Tormasov-132”)
1114	U.S. Patent Application Publication No. 20020147815 (“Tormasov-815”)
1115	U.S. Patent No. 7,209,973 (“Tormasov-973”)
1116	U.S. Patent Application Publication No. 20020138629 (“Schmidt-629”)
1117	U.S. Patent No. 6,944,860 (“Schmidt-860”)
1118	U.S. Patent Application Publication No. 20020174265 (“Schmidt-265”)
1119	U.S. Patent Application Publication No. 20020116659 (“Tormasov-659”)

Exhibit	Description
1120	Bach, Maurice. 1987. Design of the Unix Operating System by Marice J Bach, 1 edition (Feb. 27, 1987) Prentice Hall; ISBN: 0132017997.
1121	Crowley, Charles. 1997. Operating Systems: a design-oriented approach. Irwin. 1997. ISBN 0-256-15151-2.
1122	Eckel, George and Chris Hare. 1995. Building a Linux Internet Server, Chris Hare”, G. Eckel, New Riders Publishing; ISBN: 1562055259.
1123	RESERVED
1124	RESERVED
1125	RESERVED
1126	RESERVED
1127	U.S. Patent No. 6,854,009
1128	U.S. Patent No. 7,080,356
1129	U.S. Patent No. 5,870,539
1130	U.S. Patent No. 6,883,028
1131	U.S. Patent No. 7,209,959
1132	U.S. Patent Application Publication No. 20020065835
1133	The Wayback Machine archive of USENIX Association – Home Page (2001-11-14)
1134	The Wayback Machine archive of USENIX – Publications – Proceedings (2001-11-15)
1135	The Wayback Machine archive of USENIX – 2001 USENIX Annual Technical Conference (2001-11-11)
1136	The Wayback Machine archive of USENIX – 2001 USENIX Annual Technical Conference (2001-11-11)
1137	The Wayback Machine archive of 2001 FREENIX Track Technical Program – Abstract (2002-01-12)
1138	The Wayback Machine archive of “Sandboxing Applications” (2003-03-29)
1139	The Wayback Machine archive of “Sandboxing Applications” (2004-01-J9)
1140	The Wayback Machine archive of PDF of “Sandboxing Applications” (2004-01-19)
1141	The Wayback Machine archive of NLUUG: UNIX User Group – The Netherlands (2001-07-22)
1142	The Wayback Machine archive of NLUUG: Previous Events (2001-08-03)
1143	The Wayback Machine archive of Second International SANE Conference (2001-08-12)

Exhibit	Description
1144	The Wayback Machine archive of Second International SANE Conference (2001-06-20)
1145	The Wayback Machine archive of “Jails: Confining the omnipotent root.” (2000-09-02)
1146	The Wayback Machine archive of Linux Journal (1999-05-08)
1147	Plaintiff VirtaMove Corp.’s Preliminary Disclosure of Asserted Claims and Infringement Contentions, in <i>VirtaMove, Corp. v. Microsoft Corp.</i> , 7:24-cv-00338 (W.D. Tex.) (Mar. 28, 2025)
1148	Confidential Settlement Agreement

Petitioner Microsoft Corporation (“Microsoft”) and Patent Owner VirtaMove, Corp. (“Patent Owner” or “VirtaMove”) (collectively “the parties”) have entered into an agreement (“Agreement”) that resolves all underlying disputes between the parties involving U.S. Patent No. 7,519,814 (“the ’814 Patent”). All pending related litigations between the parties have been or will be dismissed. The Agreement is the only agreement or understanding between the parties made in connection with, or in contemplation of, the termination of this inter partes review.

In an email dated August 21, 2025, the Board authorized the parties to file (a) a joint motion to terminate and (b) a joint request to treat the Agreement as business confidential information.

As authorized, the parties jointly move that the Board terminate the above-captioned inter partes review, including Microsoft’s participation in that review. Pursuant to 35 U.S.C. § 317(a), “[a]n 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.” Here, termination is appropriate because the Board has not yet issued a decision on institution in this inter partes review.

No other party’s rights would be prejudiced by the termination of this inter partes review. The parties are not aware of any other pending proceeding involving the subject patent that would be affected by the requested termination of this proceeding.

Pursuant to 35 U.S.C. 317(b) and 37 C.F.R. § 42.74(b), the parties certify that they are filing concurrently herewith, as Ex. 1148, a true copy of the Agreement between the parties related to the subject patent, and a joint request to treat that agreement as business confidential information and to keep that agreement separate from the file of the involved patent, pursuant to 35 U.S.C. 317(b) and 37 C.F.R. § 42.74(c). The Agreement does not reference any other agreement and is the entire agreement between the parties. Ex. 1148, Section 5.19 (“Entire Agreement”).

In view of the above, the parties respectfully request that the Board grant the parties’ joint motion to terminate this inter partes review, including Microsoft’s participation in that review. The parties further request that the Board grant their joint request to treat the Agreement as business confidential information and keep it separate from the file of the involved patent.

Respectfully submitted,

Date: August 21, 2025

/s/ James M. Heintz

James M. Heintz, Reg. No. 41,828
DLA Piper LLP
One Fountain Square
11911 Freedom Drive, Suite 300
Reston, VA 20190-5602
P: +1 703 773 4000
F: +1 703 773 5000

*Attorney for Petitioner Microsoft
Corporation.*

Dated: August 21, 2025

/s/ James Milkey

Reza Mirzaie
rmirzaie@raklaw.com
Marc A. Fenster
mfenster@raklaw.com
Neil A. Rubin
nrubin@raklaw.com
James Milkey
jmilkey@raklaw.com
RUSS AUGUST & KABAT
12424 Wilshire Boulevard, 12th Floor
Los Angeles, CA 90025

Qi (Peter) Tong
ptong@raklaw.com
RUSS AUGUST & KABAT
4925 Greenville Ave, Suite 200
Dallas, TX 75206
Attorney for Patent Owner VirtaMove, Corp.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing document has been served via electronic mail upon the following on August 21, 2025:

rak_virtamove@raklaw.com

DLA-MicroIPR-VirtaM@us.dlapiper.com

Dated: August 21, 2025

Respectfully Submitted,

/s/ James M. Heintz

James M. Heintz, Reg. No. 41,828

DLA Piper LLP

One Fountain Square

11911 Freedom Drive, Suite 300

Reston, VA 20190-5602

P: +1 703 773 4000

F: +1 703 773 5000

Attorney for Petitioner