UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

APPLE INC.,

Petitioner,

v.

APEX BEAM TECHNOLOGIES LLC,

Patent Owner.

Patent No. 11,546,110
Filing Date: January 7, 2021
Issue Date: January 3, 2023

Inventor: Xiaobo Zhang
Title: METHOD AND DEVICE FOR MULTI-ANTENNA TRANSMISSION IN USER EQUIPMENT (UE) AND BASE STATION

JOINT MOTION TO TERMINATE PROCEEDING

Case No. IPR2025-00903

LIST OF EXHIBITS

Exhibit No.	Description
2001	Scheduling Order, Dkt. 40, *Apex Beam Techs. LLC v. Apple Inc.*, Case No. 6:24-cv-00223-ADA (W.D. Tex. June 18, 2025)
2002	Apex Beam Technologies LLC's Infringement Contentions and P.R. 3-1 and 3-2 Disclosures in *Apex Beam Techs. LLC v. Apple Inc.*, Case No. 6:24-cv-00223-ADA (W.D. Tex.), dated May 27, 2025
2003	Complaint, Dkt. 1, *Apex Beam Techs. LLC v. Apple Inc.*, Case No. 6:24-cv-00223-ADA (W.D. Tex. April 29, 2024)
2004	Confidential Settlement Agreement
2005	Confidential Release

Pursuant to 35 U.S.C. § 317(a), 37 C.F.R. § 42.74, and the Board's email of January 21, 2026, Petitioner Apple, Inc. ("Apple" or "Petitioner") and Patent Owner Apex Beam Technologies LLC ("Apex Beam" or "Patent Owner") (collectively, the "Parties") have reached a resolution and jointly move to terminate the above-captioned proceeding.

I. STATEMENT OF FACTS

The Parties have reached an agreement to resolve their disputes in the above-captioned *inter partes* review relating to U.S. Patent No. 11,546,110.

Pursuant to 35 U.S.C. § 317(b) and 37 C.F.R. § 42.74(b), Petitioner and Patent Owner submit a true copy of the confidential settlement agreement in its entirety, filed herewith as Exhibit 2004. Petitioner and Patent Owner further submit a true copy of a confidential release signed by the Parties, filed herewith as Exhibit 2005. A "Joint Request to File Settlement Agreement as Business Confidential Information Pursuant to 35 U.S.C. § 317 and 37 C.F.R. § 42.74" is being filed concurrently with this Joint Motion to Terminate, to treat Exhibits 2004 and 2005 as business confidential information and to keep them separate from the files of the involved patent pursuant to 35 U.S.C. § 317(b) and 37 C.F.R. § 42.74(c). There are no other collateral agreements between the Parties made in connection with, or in contemplation of, the termination sought.

II. RELIEF REQUESTED

Termination of this *inter partes* review is requested, and the Parties respectfully submit that such termination is justified. "There are strong public policy reasons to favor settlement between the parties to a proceeding." Consolidated Trial Practice Guide 86 (Nov. 2019). "The Board expects that a proceeding will terminate after the filing of a settlement agreement, unless the Board has already decided the merits of the proceeding." *Id.* (citing 35 U.S.C. §§ 317(a)).

The Board should terminate this proceeding, as the Parties jointly request, for the following reasons.

First, Apple and Apex Beam have met the statutory requirement that they file a "joint request" to terminate before the Office "has decided the merits of the proceeding." 35 U.S.C. § 317(a). Under section 317(a), an *inter partes* review shall be terminated upon such joint request "unless the Office has decided the merits of the proceeding before the request for termination is filed." There are no other preconditions recited in 35 U.S.C. § 317(a).

Second, Apple and Apex Beam have reached a resolution as to all the disputes in this proceeding and as to the '110 patent. Pursuant to 35 U.S.C. § 317(b) and 37 C.F.R. § 42.74(b), the agreement made in connection with, or in contemplation of, the termination of the proceeding is in writing, and a true and correct copy is being

filed concurrently herewith as Exhibit 2004.[1] A true and correct copy of a confidential release is being filed concurrently herewith as Exhibit 2005.[2] The Parties are also filing concurrently herewith a joint request under 35 U.S.C. § 317(b) and 37 C.F.R. § 42.74(c) to treat these agreements as business confidential information and keep them separate from the files of the '110 patent. The Parties certify that there are no other agreements, oral or written, between the Parties made in connection with, or in contemplation of, the termination of this proceeding.

Third, termination would save significant further expenditure of resources by the Parties. Termination upon settlement, as requested, would also further the purpose of *inter partes* review proceedings, which seek to provide an efficient and less costly alternative forum for patent disputes. Further, maintaining the proceeding would discourage further resolutions, as patent owners in similar situations would have a strong disincentive to resolve the dispute if they perceived that an *inter partes* review would continue regardless of a resolution.

III. CONCLUSION

For the foregoing reasons, Apple and Apex Beam respectfully request termination of this *inter partes* review.

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[1] The agreement is being filed via the Patent Trial and Appeal Board Case Tracking System (PTACTS) system with access to the "Board only."

[2] The agreement is being filed via the Patent Trial and Appeal Board Case Tracking System (PTACTS) system with access to "Parties and Board."

Dated: March 13, 2026

Respectfully submitted,

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CERTIFICATE OF SERVICE

A copy of the JOINT MOTION TO TERMINATE PROCEEDINGS and Exhibit 2005 has been served on Petitioner's counsel of record as follows:

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March 13, 2026 By: /*Vincent J. Rubino, III* /
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