UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

Mercedes-Benz Group AG,
Petitioner,

v.

Phelan Group LLC,
Patent Owner.

IPR2025-00992
Patent No. 11,352,020

JOINT MOTION TO TERMINATE PROCEEDING

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Pursuant to 35 U.S.C. § 317(a) and 37 C.F.R. § 42.72, Petitioner Mercedes-Benz Group, AG ("**Mercedes**") and Patent Owner The Phelan Group, LLC ("**Phelan**") jointly request termination of this proceeding, IPR2025-00992, challenging claims of U.S. Patent No. 11,352,020 (the "'020 Patent") as a result of a Settlement Agreement that resolves all pending disputes between Mercedes and Phelan. The Board authorized filing of this Joint Motion to Terminate via email on November 25, 2025. Mercedes and Phelan are filing substantively identical motions to terminate in six other IPR proceedings involving related patents, that are similarly resolved by the Settlement Agreement. These are:

- IPR2025-00413
- IPR2025-00758
- IPR2025-00930
- IPR2025-00919
- IPR2025-00990
- IPR2025-00986

Mercedes and Phelan are filing concurrently herewith a request that the Settlement Agreement, filed as EX1020, be kept confidential and separate from the file pursuant to 35 U.S.C. § 317(b) and 37 C.F.R. § 42.74(c).

Mercedes filed its petition for *inter partes* review on May 12, 2025. The

Board has not yet determined whether to institute the trial to date. A Settlement Agreement has been reached which resolves all underlying disputes between Mercedes and Phelan, including those related to this proceeding and the underlying district court case.[1] The parties do not anticipate further litigation between them concerning the ’020 Patent. A true and correct copy of the Settlement Agreement is being filed herewith as EX1020. Mercedes and Phelan certify that there are no collateral agreements or understandings between them made in connection with, or in contemplation of, termination of this proceeding.

The Board should terminate this IPR because the proceeding is still in its very early stages, the Board has not yet determined whether to institute the trial to date, and no final written decision has issued. As the Board has recognized, early termination—particularly when unopposed—promotes efficiency and substantially conserves the Board’s and parties’ resources. Termination is also appropriate because public policy favors terminating the present petition for inter partes review. For example, the Board’s Trial Practice Guide acknowledges that “[t]here are strong public policy reasons to favor settlement between the parties to a proceeding.” Consolidated Office Patent Trial Practice Guide, at 86 (Nov. 2019).

[1] *The Phelan Group, LLC v. Mercedes-Benz Group, AG*, Case No. 1:25-CV-1399-SEG (N.D. Ga.).

For the foregoing reasons, Mercedes and Phelan respectfully request termination of IPR2025-00992 involving U.S. Patent No. 11,352,020.

Dated: November 26, 2025 Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing **JOINT MOTION TO TERMINATE PROCEEDING** and exhibit was served on counsel of record via electronic mail on November 26, 2025, as follows:

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