

Filed on behalf of:

AMAZON.COM, INC. AND
AMAZON WEB SERVICES, INC.

By:

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UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

AMAZON.COM, INC., and
AMAZON WEB SERVICES, INC.,

Petitioners,

v.

DIVX, LLC,

Patent Owner.

Case: IPR2025-01062
U.S. Patent No. 10,715,806

MOTION TO WITHDRAW PETITION FOR *INTER PARTES* REVIEW

EXHIBIT LIST (37 C.F.R. § 42.63(e))

Ex. No.	Description
1001	U.S. Patent No. 10,715,806 (“the 806 Patent”)
1002	Excerpts of Prosecution File History for the 806 patent
1003	Declaration of Hari Kalva, Ph.D.
1004	Sambe, Yasuo et al., High Speed Distributed Video Transcoding for Multiple Rates and Formats, IEICE Transactions on Information and Systems, August 2005 (“Sambe”)
1005	U.S. Patent No. 6,490,320 (“Vetro”)
1006	U.S. Patent Application Publication No. 2010/0189183 (“Gu”)
1007	Xin, Jun et al., Digital Video Transcoding, Proceedings of the IEEE, Vol. 93, No. 1, January 2005
1008	Ahmad, Ishfaq et al., Video Transcoding: An Overview of Various Techniques and Research Issues, IEEE Transactions on Multimedia, Vol. 7, No. 5, October 2005
1009	Vetro, Anthony et al., Object-Based Transcoding for Adaptable Video Content Delivery, IEEE Transactions on Circuits and Systems for Video Technology, Vol. 11, No. 3, March 2001
1010	Kuhn, Peter et al., MPEG-7 Transcoding Hints for Reduced Complexity and Improved Quality, 2001
1011	Lao, Feng et al., Parallelizing Video Transcoding Using Map-Reduce-Based Cloud Computing, 2012
1012	Dogan, S. et al., MPEG-4 Video Transcoder for Mobile Multimedia Traffic Planning, Centre for Communication Systems Research (CCSR), University of Surrey, UK, 2001
1013	Richardson, Iain E., The H.264 Advanced Video Compression Standard, 2nd ed., 2010

Ex. No.	Description
1014	Sun, Huifang et al., Digital Video Transcoding for Transmission and Storage, 2005
1015	Vetro, Anthony et al., Video Transcoding Architectures and Techniques: An Overview, IEEE Signla Processing Magazine, March 2003
1016	Springer - Handbook of Data Compression, 5th ed., 2010
1017	Van Beek, Peter et al., Metadata-Driven Multimedia Access, IEEE Signal Processing Magazine, March 2003
1018	Ho, Chia-Chiang et al., Building MPEG-7 Transcoding Hints from Intrinsic Characteristics of MPEG Videos, IEEE Transactions on Consumer Electronics, Vol. 50, No. 1, February 2004
1019	Ely, S. R., MPEG Video Coding A Simple Introduction, EBU Technical Review, 1995
1020	Yu, Lu and Wang, Jian-peng, Review of the current and future technologies for video compression, Journal of Zhejiang University-Science C (Computers & Electronics), 2010
1021	Shi, Changui et al., A Fast MPEG Video Encryption Algorithm, ACM Multimedia, 1998
1022	Xie, Bo and Zeng, Wenjun, A Sequence-Based Rate Control Framework for Consistent Quality Real-Time Video, IEEE Transactions and Systems for Video Technology, Vol. 16, No. 1, January 2006
1023	Bozoki, S. et al., Parallel Algorithms for MPEG Video Compression with PVM, Dept. of Telecommunications, 1996
1024	He, Yong et al., A Software-Based MPEG-4 Video Encoder Using Parallel Processing, IEEE Transactions on Circuits and Systems for Video Technology, Vol. 8, No. 7, November 1998

Ex. No.	Description
1025	A true and correct copy of the MARC record for the journal <i>IEICE Transactions on Information and Systems</i> from the Linda Hall Library of Science, Engineering & Technology online catalog
1026	Library of Congress Authorities, MARC Display, Subject Heading for Information Technology Periodicals
1027	A true and correct copy of the MARC record for the journal IEICE Transactions on Information and Systems obtained from the OCLC bibliographic database
1028	Declaration of Sylvia D. Hall-Ellis, Ph.D.
1029	G. J. Sullivan, J. -R. Ohm, W. -J. Han and T. Wiegand, “Overview of the High Efficiency Video Coding (HEVC) Standard,” in IEEE Transactions on Circuits and Systems for Video Technology, vol. 22, no. 12, pp. 1649-1668, Dec. 2012, doi: 10.1109/TCSVT.2012.2221191. PDF available here: https://ieeexplore.ieee.org/abstract/document/6316136
1030	Curriculum Vitae of Hari Kalva, Ph.D.
1031	Email correspondence between Nathan Lowenstein and Daniel Rabinowitz

I. INTRODUCTION

On August 21, 2025, the Board authorized Petitioners Amazon.com, Inc. and Amazon Web Services, Inc. to move to withdraw their pending petitions for inter partes review of U.S. Patent Nos. 10,715,806 (“806 patent”), 10,412,141 (“141 patent”), and 11,611,785 (“785 patent”), relating to Petition Nos. IPR2025-01062, IPR2025-01222, and IPR2025-01223, respectively. Petitioners now file this unopposed motion to withdraw.¹ This proceeding is at a preliminary phase: Patent Owner filed its opening discretionary denial briefing two days before Petitioners filed this motion, Patent Owner has not filed its preliminary response, and the Board has not reached the merits or issued an institution decision. Permitting the withdrawal of the petition, and terminating Petition No. IPR2025-01062, would promote efficiency and preserve resources of the Board and the parties.

II. BACKGROUND

On May 27, 2025, Petitioners filed a petition for *inter partes* review of the 806 patent. *Amazon.com, Inc. v. DivX, LLC*, IPR2025-01062, Paper 5 at 1 (P.T.A.B. June 20, 2025). On June 30, 2025, Petitioners filed petitions for *inter partes* review of the 785 and 141 patents. *Amazon.com, Inc. v. DivX, LLC*, IPR2025-01222,

¹ On August 21, 2025, Petitioners filed motions in IPR2025-01062, IPR2025-01222, and IPR2025-01223.

Paper 3 at 1 (P.T.A.B. July 17, 2025); *Amazon.com, Inc. v. DivX, LLC*, IPR2025-01223, Paper 3 at 1 (P.T.A.B. July 17, 2025).

On July 1, 2025, the district court in the parallel litigation involving the 806, 141, and 785 patents denied Petitioners' motion to stay the litigation. *DivX, LLC v. Amazon.com, Inc.*, No. 1:24-cv-02061 (CMH/LRV), Dkt. No. 68 (E.D.Va. Jul. 1, 2025). On July 22, 2025, the district court set a final pretrial conference date for December 18, 2025. *See id.*, Dkt. 73.

On August 13, 2025, Petitioners informed Patent Owner that they plan to seek authorization from the Board to file a motion to withdraw the petitions, and asked whether the Patent Owner consented to the withdrawal. On August 19, 2025, Patent Owner confirmed it did not oppose, but requested to review Petitioners' proposed email to the Board and include a detailed explanation for its position. *See* EX1031. The same day, Patent Owner filed its opening discretionary denial briefings for each of the *inter partes* reviews. IPR2025-01062, Paper 9 (P.T.A.B. Aug. 19, 2025); IPR2025-01222, Paper 9 (P.T.A.B. Aug. 19, 2025); IPR2025-01223, Paper 9 (P.T.A.B. Aug. 19, 2025). On August 20, 2025, Patent Owner finally approved the email and provided its detailed position.

Patent Owner has not filed its preliminary response, and the Board has not reached the merits or issued an institution decision.

III. GOOD CAUSE EXISTS FOR WITHDRAWING THE PETITIONS

Under 37 C.F.R. §§ 42.71(a), 42.5(a), and Board precedent allowing petitioners to withdraw petitions prior to institution, good cause exists for Petitioners' request to withdraw IPR2025-01062. *See Reolink Digit. Tech. Co., Ltd. v. KT Imaging USA, LLC*, IPR2024-01154, Paper 6 at 3 (P.T.A.B. Sept. 23, 2024) (granting withdrawal of petition before institution); *Gen. Elec. Co. v. Siemens Gamesa Renewable Energy A/S*, IPR2021-00722, Paper 11 at 3 (P.T.A.B. Oct. 7 2021) (same); *Materialise N.V. v. Osteoplastics, LLC*, IPR2021-00245, Paper 12 at 3 (P.T.A.B. June 2, 2021) (same); *Lenovo (United States) Inc. v. Collision Comms., Inc.*, IPR2025-00284, Paper 11 at 1-2 (P.T.A.B. May 20, 2025) (same). This proceeding is at a preliminary stage: Patent Owner just filed its discretionary denial brief two days before Petitioners filed this motion, Patent Owner has not filed its preliminary response, and the Board has not reached the merits or issued an institution decision. No prejudice exists because Patent Owner does not oppose the motion. *Reolink*, IPR2024-01154, Paper 6 at 2. The Board should grant Petitioners' unopposed motion to withdraw to promote efficiency and preserve both the Board's and the parties' resources. *See, e.g., id.*, 2-3 (the Board granting unopposed motion to withdraw under similar circumstances); *Intel Corp. v. Tela Innovations, Inc.*, IPR2019-01257, Paper 16 at 3 (P.T.A.B. Jan. 2, 2020) (the Board granting

unopposed motion “to dismiss petitions and terminate the proceedings to promote efficiency and minimize unnecessary costs”).

IV. CONCLUSION

For these reasons, Petitioners respectfully request that the Board grant the motion to withdraw its petition and terminate Case No. IPR2025-01062.

Dated: August 21, 2025

FENWICK & WEST LLP

/J. David Hadden/

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Reg. No. 40,629

Attorney for Petitioner
Amazon.com, Inc. and
Amazon Web Services, Inc.

CERTIFICATION OF SERVICE

Pursuant to 37 C.F.R. § 42.6, the undersigned certifies that on August 21, 2025, I caused a true and correct copy of the foregoing MOTION TO WITHDRAW PETITION FOR INTER PARTES REVIEW to be electronically served on Patent Owner's lead and backup counsel at the following addresses:

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Dated: August 21, 2025

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