

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

Starbucks Corporation

Petitioner

v.

PI-DESIGN AG

Patent Owner

IPR2025-01178

U.S. Patent No. 8,695,486

**JOINT MOTION TO TERMINATE PROCEEDING
PURSUANT TO 35 U.S.C. § 317 and 37 C.F.R. § 42.72**

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

LIST OF EXHIBITS

<u>Exhibit No.</u>	<u>Description</u>
EX1001	U.S. Patent No. 8,695,486 (“‘486 Patent”)
EX1002	File History of ‘486 Patent
EX1003	Curriculum vitae of Michael Jobin
EX1004	Declaration of Michael Jobin
EX1005	Complaint (Case No. 1:24-cv-05319) (N.D. Ill.)(June 25, 2025)
EX1006	U.S. Patent No. 6,295,920 (“Barden”)
EX1007	U.S. Patent No. 6,755,120 (“Lin”)
EX1008	U.S. Patent No. 7,578,231 (“Liu”)
EX1009	<i>Reserved</i>
EX1010	<i>Reserved</i>
EX1011	Merriam-Webster Dictionary Definition of “Lever”
EX1012	Cambridge Dictionary Definition of “Lever”
EX1013	U.S. Patent Application Publication No. 2003/0185949 (“Brady”)
EX1014	U.S. Patent Application Publication No. 2009/0057349 (“US349”)
EX1015	U.S. Patent Application Publication No. 2007/0295760 (“Geroult”)
EX1016	U.S. Patent No. 5,570,623 (“US623”)
EX1017	U.S. Patent No. 3,113,706 (“Wickman”)
EX1018	U.S. Patent No. 2,162,348 (“Hacmac”)
EX1019	U.S. Patent Application Publication No. 2005/0115977 (“Dibdin”)
EX1020	U.S. Patent No. 7,194,951 (“Porter”)
EX1021	Excerpts of: Graybill, G. (2007). <i>Simple machines</i> . Classroom Complete Press.
EX1022	Scheduling Order (ECF 47) (1:24-cv-05319 (N.D. Ill.))

<u>Exhibit No.</u>	<u>Description</u>
EX1023	Kumstova, K. (2018, March 22). <i>The history of French Press</i> . European Coffee Trip. https://europeancoffeetrip.com/the-history-of-french-press/
EX1024	Snyder, T. (2018, August 3). <i>How to French Press like a Pro — Illuminate Coffee Bar</i> . Illuminate Coffee Bar. https://www.illuminatecoffeebar.com/journal/2018/7/22/how-to-french-press-like-a-pro...)
EX1025	What does French Press coffee taste like? (Flavor profile & texture). (2025, April 9). Nowhere Coffee Club. https://nowherecoffeeclub.com/blogs/french-press-101/what-does-french-press-coffee-taste-like...)
EX1026	PCT Publication No. WO2009137915
EX1027	U.S. Patent No. 7,737,004
EX1028	CONFIDENTIAL Settlement Agreement

I. STATEMENT OF PRECISE RELIEF REQUESTED

Pursuant to 35 U.S.C. § 317 and 37 C.F.R. § 42.72, and the Board's authorization provided December 2, 2025, Petitioner Starbucks Corp. and Patent Owner Pi-Design AG (collectively, the "Parties") hereby provide notice that they have reached a settlement agreement and jointly request termination of *inter partes* review of U.S. Patent No. 8,695,486 (the "'486 Patent"), IPR2025-01178, with the United States Patent and Trademark Office.

II. TERMINATION IS APPROPRIATE

The basis for this Joint Motion is the settlement of all pending disputes between the Parties relating to the '486 Patent. *See*, Petition (Paper 2 at 10) (listing disputes).

On November 7, 2025, the Parties entered into a Settlement Agreement, under which the Parties agreed to terminate this proceeding, IPR2025-01178, and dismiss the underlying litigations. EX1028.

An *inter partes* review 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 proceedings before the request for termination is filed. 35 U.S.C. § 317(a). Further, "no estoppel under section 315(e) shall attach to the petitioner, or to the real party in interest or privy of the petitioner." *Id.* No other petitioners remain in this *inter partes* review, and no Final Written Decision on the merits has been

entered. For at least these reasons, termination of the *inter partes* review is proper under 35 U.S.C. § 317(a) and 37 C.F.R. § 42.72(a).

III. LEGAL STANDARD

35 U.S.C. § 317(a) provides that “[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.” 37 C.F.R. § 42.72 similarly provides that “[t]he Board may terminate a trial without rendering a final written decision, where appropriate . . . pursuant to a joint request under 35 U.S.C. § 317(a).” The Trial Practice Guide also observes that “[t]here are strong public policy reasons to favor settlement between the parties to a proceeding” and that 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.” 77 Fed. Reg. 48,756, 48,768 (Aug. 14, 2012).

IV. AGREEMENT IN WRITING SUBMITTED TO THE BOARD

Pursuant to 35 U.S.C. § 317(b) and 37 C.F.R. § 42.74(b), a true and correct copy of the Parties’ Settlement Agreement is being submitted as Exhibit 1028. The Settlement Agreement is in writing and constitutes the Parties’ entire understanding and agreement. The Parties certify that there are no other agreements or understandings made in connection with, or in contemplation of, the termination of

this *inter partes* review. Pursuant to 35 U.S.C. § 317(b) and 37 C.F.R. § 42.74(c), in a separate paper filed concurrently herewith, the Parties jointly request that the Settlement Agreement be treated as business confidential information and be kept separate from the underlying patent file.

V. CONCLUSION

Termination of the proceeding is a just and fair resolution and would serve the interests of judicial economy as well as the mutual interest of the Parties. The Parties agree that neither Petitioner nor Patent Owner will be prejudiced by the termination of this proceeding. For at least the foregoing reasons, the Parties respectfully request that the Board terminate *Inter Partes* Review No. IPR2025-01178.

Dated: December 5, 2025

/Thomas J. Campbell, Jr./

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Dated: December 5, 2025

/John G. Bisbikis/

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Lead Counsel for Patent Owner

CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing document and supporting Exhibit 1028 were served on December 5, 2025 by filing this document through the Patent Trial and Appeal Case Tracking System (P-TACTS) as well as delivering a copy via electronic mail upon lead counsel (John G. Bisbikis, jbisbikis@prospectlaw.com) and backup counsel (Nathan Cummings, nathan@cummingsip.com) identified in Patent Owner's Mandatory Notices (Paper No. 4).

Date: December 5, 2025

By: /Thomas J. Campbell, Jr./

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NEAL, GERBER & EISENBERG LLP

Lead Counsel for Petitioner