

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAMSUNG ELECTRONICS CO., LTD.,
AND SAMSUNG ELECTRONICS AMERICA, INC.,
Petitioners,

V.

HANNIBAL IP LLC,
Patent Owner.

Case IPR2025-01190
Patent No. 11,641,661

**JOINT MOTION TO TERMINATE INTER PARTES REVIEW
PURSUANT TO 35 U.S.C. § 317 AND 37 C.F.R. § 42.74**

Patent Owner's Exhibit List

Exhibit	Description
2011	Confidential Settlement and License Agreement

Pursuant to 35 U.S.C. § 317(a), 37 C.F.R § 42.74 and the authorization provided by the Board via email on April 10, 2026, Petitioners Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. (“Petitioners” or “Samsung”) and Patent Owner Hannibal IP LLC (“Patent Owner” or “Hannibal”) jointly request termination of this proceeding, IPR2025-01190 directed to U.S. Patent No. 11,641,661 (the “’661 Patent”), as a result of a Settlement and License Agreement that resolves all pending disputes between Petitioners and Patent Owner. A joint motion to terminate is also being filed in IPR2025-01187 directed to U.S. Patent No. 11,057,896 (the “’896 Patent”); IPR2025-011188, directed to U.S. Patent No. 11,272,535 (the “’535 Patent”); and IPR2025-01189 directed to U.S. Patent No. 11,368,911 (the “’911 Patent”) based on this same Settlement Agreement.

I. CERTIFICATION

Petitioners and Patent Owner submit a true and correct copy of the Settlement and License Agreement (Confidential Ex. 2011) between Petitioners and Patent Owner made in connection with, or in contemplation of, the termination of the proceeding under 37 CFR § 42.74(b) with this joint motion. 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 these *inter partes* review proceedings.

II. STATUS OF RELATED PROCEEDINGS

Petitioners and Patent Owner have resolved their disputes regarding the '896, '535, '911, and '661 Patents, including both in this proceeding and assertion of the '896, '535, '911, and '661 Patents in the related district court litigation, *Hannibal IP, LLC. v. Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc.*, Case No. 4:25-CV-00200 (E.D. Tex.) which remains stayed pending the *inter partes* review proceedings involving Petitioners and Patent Owner. The parties do not anticipate further litigation between them concerning the patents at issue here.

III. RELIEF REQUESTED

As authorized by the Board, the parties are jointly and contemporaneously filing: (i) this joint motion to terminate the proceeding; (ii) a true copy of the Settlement and License Agreement (Confidential Ex. 2011) between Petitioners and Patent Owner made in connection with, or in contemplation of, the requested termination; and (iii) a joint request to treat the agreement as business confidential information and keep the agreement (Confidential Ex. 2011) separate from the file of the involved patents, pursuant to 35 U.S.C. § 317(b) and 37 C.F.R. § 42.74(c). The Settlement and License Agreement is being filed as “Available to Parties and Board Only” in order to preserve confidentiality.

Petitioners and Patent Owner jointly request that the Board terminate this

proceeding in its entirety. Termination is appropriate at this stage and in view of a settlement between Petitioners and Patent Owner. An *inter partes* review shall be terminated with respect to any petitioners upon the joint request of the petitioners 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); *see also, e.g., Pfizer, Inc. v. Novo Nordisk A/S*, IPR2020-00324, Paper 80 (2011) (granting termination two days before deadline for final written decision); *Clio USA, Inc. v. The Procter & Gamble Co.*, IPR2013-00438, Paper 57 (2014) (request granted after oral hearing). Good cause exists to terminate this proceeding because (1) Petitioners and Patent Owner have resolved their disputes regarding the '896, '535, '911, and '661 Patents; (2) the Office has not yet decided the merits of this proceeding in a final written decision; and (3) terminating the proceeding now would thus serve the interests of preservation of Board resources as well as the mutual interest of the parties.

Accordingly, Petitioners and Patent Owner respectfully request that the Board grant this Joint Motion to Terminate.

Dated: April 16, 2026

/Brian A. Carpenter/
Brian A. Carpenter
USPTO Reg. No. 37,109
Attorney for Patent Owner
Hannibal IP LLC

IPR2025-01190

U.S. Patent No. 11,641,661

/Joshua L. Goldberg/

Joshua L. Goldberg

USPTO Reg. No. 59,369

Attorney for Petitioners

Samsung Electronics Co., Ltd.

and Samsung Electronics

America, Inc.

CERTIFICATE OF SERVICE

I, Brian A. Carpenter, hereby certify that on the 16th day of April, 2026, the foregoing **MOTION TO TERMINATE INTER PARTES REVIEW PURSUANT TO 35 U.S.C. § 317 AND 37 C.F.R. § 42.74** was served on the following by email:

Joshua L. Goldberg (joshua.goldberg@finnegan.com)

Timothy J. May (timothy.may@finnegan.com)

Nicholas A. Cerulli (nicholas.cerulli@finnegan.com)

Chen Zang (chen.zang@finnegan.com)

Kevin D. Rodkey (kevin.rodkey@finnegan.com)

/Brian A. Carpenter/

Brian A. Carpenter

USPTO Reg. No. 37,109

Vishal Patel

Admitted *Pro Hac Vice*

Cole Schotz P.C.

901 Main Street, Suite 4120

Dallas, TX 75202

469.557.9390

bcarpenter@coleschotz.com

vpatel@coleschotz.com

Jeffrey M. Saltman

Admitted *Pro Hac Vice*

COLE SCHOTZ P.C.

1875 K Street NW, Suite 475

Washington, D.C. 20006

202.221.7500

jsaltman@coleschotz.com

Attorneys for Patent Owner

Hannibal IP LLC