

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

Apple, Inc.
Petitioner,

v.

Vampire Labs, LLC,
Patent Owner.

IPR2025-01215
Patent No. 8,358,103

JOINT MOTION TO TERMINATE PROCEEDING

Pursuant to 35 U.S.C. § 317(a) and 37 C.F.R. § 42.74, Petitioner Apple, Inc. (“**Apple**”) and Patent Owner Vampire Labs, LLC (“**Vampire Labs**”) jointly request termination of this proceeding, IPR2025-01215, challenging claims of U.S. Patent No. 8,358,103 (the “’103 Patent”) as a result of a Settlement Agreement that resolves all pending disputes between Apple and Vampire Labs. The Board authorized filing of this Joint Motion to Terminate via email on January 21, 2026.

Apple and Vampire Labs are filing concurrently herewith a request that the Settlement Agreement, filed as EX2006, be kept confidential and separate from the file pursuant to 35 U.S.C. § 317(b) and 37 C.F.R. § 42.74(c).

Apple filed its petition for *inter partes* review on June 27, 2025. The Board instituted *inter partes* review on December 1, 2025. (Paper 10). Since institution, a Settlement Agreement has been reached which resolves all underlying disputes between Apple and Vampire Labs, including those related to this proceeding and the underlying district court case.¹ The parties do not anticipate further litigation between them concerning the ‘103 Patent. A true and correct copy of the Settlement Agreement is being filed herewith as EX2006. Apple and Vampire Labs certify that there are no collateral agreements or understandings between them made in connection with, or in contemplation of, termination of this proceeding.

¹ *Vampire Labs, LLC v. Apple Inc.*, 1:24-cv-01377-ADA (W.D. Tex.)

The Board should terminate this IPR because the proceeding is still in its very early stages, the Patent Owner has yet to file a Patent Owner Response, 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).

For the foregoing reasons, Apple and Vampire Labs respectfully request termination of IPR2025-01215 involving U.S. Patent No. 8,358,103.

Dated: February 1, 2026

Respectfully submitted,

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