

UNITED STATES PATENT AND TRADEMARK OFFICE

PATENT TRIAL AND APPEAL BOARD

REGIONS BANK

Petitioner,

v.

UNITED SERVICES AUTOMOBILE ASSOCIATION,

Patent Owner.

Case No. IPR2025-01356
U.S. Patent No. 12,211,095

JOINT MOTION TO TERMINATE
PURSUANT TO 35 U.S.C. § 317(a)

Pursuant to 35 U.S.C. § 317(a) and 37 C.F.R. § 42.72, and the Board's authorization of March 23, 2026, Regions Bank ("Petitioner") and United Services Automobile Association ("Patent Owner") jointly move to terminate the present *inter partes* review ("IPR") proceeding in light of Patent Owner's and Petitioner's settlement of their dispute regarding U.S. Patent No. 12,211,095 ("the '095 Patent").

Petitioner and Patent Owner are concurrently filing a true copy of their Settlement Agreement (Confidential Exhibit 1088) in connection with this matter as required by 37 C.F.R. §§ 42.74(b). Petitioner and Patent Owner certify that there are no other agreements or understandings, oral or written, between Petitioner and Patent Owner, including any collateral agreements, made in connection with, or in contemplation of, the termination of the present proceeding. A joint request to treat the Settlement Agreements as business confidential information kept separate from the file of the involved patent pursuant to 37 C.F.R. § 42.74(c) is being filed concurrently.

LEGAL STANDARD

"The parties may agree to settle any issue in a proceeding, but the Board is not a party to the settlement and may independently determine any question of jurisdiction, patentability, or Office practice." § 42.74(a). A joint motion to terminate generally "must (1) include a brief explanation as to why termination is appropriate; (2) identify all parties in any related litigation involving the patents at

issue; (3) identify any related proceedings currently before the Office, and (4) discuss specifically the current status of each such related litigation or proceeding with respect to each party to the litigation or proceeding.” *Heartland Tanning, Inc. v. Sunless, Inc.*, IPR2014-00018, Paper No. 26, at 2 (P.T.A.B. July 28, 2014).

The Board has consistently granted a request to terminate a proceeding for both the Petitioner and Patent Owner when the request is filed before briefing has completed, which is the case here. *See, e.g., Itron, Inc. v. Certified Measurement, LLC*, IPR2015-00570, Paper 28, at 2-3 (P.T.A.B. February 16, 2016) (terminating the proceedings for both Patent Owner and Petitioner while noting that since “Petitioner has not yet filed a Reply in any of the cases, ... if we do not terminate these proceedings with respect to Patent Owner, ... [the Board] will be required to determine patentability on less than a full record”); *CB Distributors, Inc. and DR Distributors, LLC v. Fontem Holdings 1 B.V.*, IPR2014-01529, Paper 41, at 4 (P.T.A.B. December 7, 2015) (terminating the proceedings for both Patent Owner and Petitioner where a reply to the Patent Owner Response had yet to be filed).

ARGUMENT

Termination of the present *inter partes* review proceeding is appropriate because (1) Petitioner and Patent Owner have resolved their dispute regarding the ’310 Patent and have agreed to terminate this proceeding, (2) the Office has not yet decided the merits of the proceeding, and (3) public policy favors the termination.

The Board instituted this IPR on February 10, 2026. See Dec. Instn., Paper 18. No Patent Owner Response has been filed, let alone a reply from Petitioner. No deposition has been taken. The early stage of the proceeding strongly favors termination. *See, e.g., Itron, Inc.*, IPR2015-00570, Paper 28, at 2-3; *CB Distributors*, IPR2014-01529, Paper 41, at 4.

Public policy also favors the termination. As recognized by the rules of practice before the Board:

There are strong public policy reasons to favor settlement between the parties to a proceeding. The Board will be available to facilitate settlement discussions, and where appropriate, may require a settlement discussion as part of the proceeding. 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.

Patent Office Trial Practice Guide, Fed. Register, Vol. 77, No. 157 at 48768 (Aug. 14, 2012); Consolidated Trial Practice Guide (Nov. 2019), 86 (“Trial Practice Guide”). Moreover, no public interest or other factors militate against termination of this proceeding.

As to the remaining *Heartland Tanning* requirements regarding the identification and status of related proceedings, there is one related district court

litigation, in which Petitioner and Patent Owner are both parties, as identified in the Mandatory Notices. The parties to this related litigation (*United Services Auto Assoc'n v. Regions Bank*, Case No. 25-00082-JRG, E.D. Tex) have filed a joint motion to stay all deadlines and a notice of settlement, which the district court granted in its Order of March 16, 2026. *See* Dkt. Nos. 86-87. The parties have filed a stipulation and joint motion to dismiss the action in its entirety, including all claims regarding the '095 Patent. *See* Dkt. 88. As such, the parties would not obtain any benefit by the continuance of this proceeding.

Petitioner and Patent Owner are parties to an IPR proceeding in IPR2025-001326, which concerns a patent which is also at issue in the above-mentioned district court litigation. Contemporaneously with this motion, Petitioner and Patent Owner are also filing a Joint Motion to Terminate that IPR proceeding as well.

There is a follow-on “copycat” petition in IPR2026-00277 filed by Fifth Third Bank, N.A. (“FTB”) on February 27, 2026, that is “materially identical” to the petition filed by Petitioner in this IPR2025-01356. Pet., IPR2026-00277, Paper 2, at 1. Patent Owner has filed a paper opposing petitioner FTB’s motion for joinder and will file papers requesting that FTB’s petition be discretionarily denied and denied on the merits. *See Patent Owner’s Opposition to Petitioner’s Motion for Joinder*, IPR2026-00279, Paper 8. There is no current parallel litigation between FTB and Patent Owner.

The Board should not decline to terminate this IPR2025-01356 because of the copycat petition filed in IPR2026-00277. Under 35 U.S.C. § 317(a), the Board “shall” terminate the proceeding with respect to the petitioner upon joint request “unless the Office has decided the merits of the proceeding,” which is not the case here. As reflected in the Trial Practice Guide and *Heartland Tanning*, there is a strong preference for termination of IPR proceedings when the parties have entered into a settlement resolving the dispute including the IPR. This is particularly the case when the IPR proceeding is at an early stage where the Board has not expended substantial resources on the merits.

The existence of a later-filed petition by a different party should not be the basis for denying termination of this proceeding. IPR2026-00277 is a separate matter that will be evaluated under the Board’s independent institution standards and may or may not proceed. Section 317(a) focuses on the parties to the instituted proceeding, and where—as here—those parties have settled and jointly request termination prior to any decision on the merits, termination is the appropriate outcome. Denying termination based on a speculative, non-instituted petition would conflate distinct proceedings and undermine the efficiency that § 317(a) is intended to promote. It would also strongly discourage the Board’s stated public policy preference for settlement if the Board did not terminate such an IPR in the early stages upon joint request by the parties.

CONCLUSION

For the foregoing reasons, Petitioner and Patent Owner jointly and respectfully request that the instant proceeding be terminated. As further agreed by the Parties, Petitioner files this Notice on behalf of both Parties.

Dated: March 23, 2026

Respectfully submitted,

By: /David L. Cavanaugh/
David L. Cavanaugh
Reg. No. 36,476

Counsel for Petitioner

List of Exhibits

Ex. No.	Description
1001	U.S. Patent No. 12,211,095 (“USP095”)
1002	Declaration of Dr. Daniel Lopresti (“Decl.”)
1003	International Patent Application Publication No. WO 2005/043857 and Declaration of Translation (“Garcia”)
1004	Chinese Patent Application Publication No. CN 1897644A and Declaration of Translation (“Luo”)
1005	Meier, Reto, Professional Android™ Application Development, June 25, 2008 (“Meier”)
1006	Meier, Reto, Professional Android™ Application Development, June 25, 2008 (“Meier”)
1007	U.S. Patent Application Publication No. 2007/0262148 (“Yoon”)
1008	Goyal, Vikram, Pro Java ME MMAPi: Mobile Media API for Java Micro Edition, June 14, 2006 (“Goyal”)
1009	PTAB-IPR2021-01073 Final Written Decision (“571-FWD”)
1010	PTAB-IPR2022-00076 Final Written Decision (“598-FWD”)
1011	U.S. Patent No. 7,590,275 (“Clarke”)
1012	US Patent Publication No. 2006/0186194 (“Richardson”)
1013	“FDIC: Check Clearing for the 21st Century Act (Check 21),” FED.DEPOSIT INS. CORP., Apr. 25, 2016 (retrieved from https://web.archive.org/web/20161005124304/https://www.fdic.gov/consumers/assistance/protection/check21.html) (“FDIC”)
1014	EP Patent Publication No. 0984410 (“Slater”)
1015	Whitney et al., <i>Reserve Banks to Adopt DSTU X9.37-2003 Format for Check 21 Image Services</i> (May 18, 2004) (retrieved from https://web.archive.org/web/20040609221704/http://www.frbserve.s.org/Retail/pdf/PRFormatForCheck21ImageSvcs.pdf) (“DSTU”)
1016	Excerpts from Motomanual MotoRokr™ E6 GSM, 2006, https://motorola.manymanuals.com/mobile-phones/e6/user-manual-8407 (“MotoRokr-Manual”)
1017	U.S. Patent No. 8,768,836 (“Acharya”)
1018	U.S. Patent No. 8,290,237 (“Burks”)
1019	Parikh, Tapan S., <i>Using Mobile Phones for Secure, Distributed Document Processing in the Developing World</i> , 4 IEEE Pervasive Computing 74 (2005) (“Parikh”)

Ex. No.	Description
1020	Bruno-Britz, Maria, “Mitek Launches Mobile Phone Check Capture Solution,” Bank Systems and Technology InformationWeek (Jan. 24, 2008), available at https://www.banktech.com/payments/mitek-launches-mobile-phonecheck-capture-solution/d/d-id/1291677.html (“Bruno-Britz”)
1021	Mitek Systems, “ImageNet Mobile Deposit,” presented at “FSTC’s 2008 Annual Conference” (June 2008), available at https://slideplayer.com/slide/9438811/ (“Mitek”)
1022	Bruene, Jim, <i>WV United Federal Credit Union is First with iPhonebased Remote Check Scan & Deposit</i> (July 12, 2009), available at https://finovate.com/wv_united_federal_credit_union_is_first_with_iphone-based_remote_check_scan_deposit/ (“Bruene”)
1023	Edwards, Benj, <i>The Golden Age of PDAs</i> , PC MAG (Nov. 20, 2018), https://www.pcmag.com/news/the-golden-age-of-pdas (“Edwards”)
1024	Rajeswari, S., <i>An Overview of Handwriting Recognition Systems</i> , 12 MIDDLE-EAST J SCI. RSCH., 1861 (2012) (“Rajeswari”)
1025	Slocombe, Mike, <i>O2 Xda Exec Mobile PDA With 3G Launched</i> (Sept. 13, 2005), available at https://digital-lifestyles.info/2005/09/13/o2-xda-exec-mobile-pda-with-3g-launched/ (“Slocombe”)
1026	Press Release, <i>Apple Reinvents the Phone with iPhone</i> (Jan. 9, 2007), https://www.apple.com/newsroom/2007/01/09Apple-Reinvents-the-Phone-with-iPhone/ (“Apple”)
1027	EveryiPhone.com, <i>Apple iPhone (Original/1st Gen/EDGE) 4, 8, 16 GB Specs</i> (Oct. 6, 2011), available at https://web.archive.org/web/20111006045037/https://everymac.com/systems/apple/iphone/specs/apple-iphone-specs.html (“EveryiPhone”)
1028	Nokia Nseries, “Nokia N93 Technical Specifications” (Aug. 31, 2006), available at https://web.archive.org/web/20060831125141/http://www.nseries.com/nseries/v2/media/product/tech_specs/en-US/tech_specs_n93_en_US.html?lang=en&country=US (“Nokia”)

Ex. No.	Description
1029	Graham, Jefferson, <i>App Store for iPhone Already a Hit with Developers</i> (July 9, 2008), available at https://web.archive.org/web/20080710230711/https://www.usatoday.com/money/industries/technology/2008-07-09-apple-apps-storeiphone-ipod_N.htm (“Graham”)
1030	Aiello, Marco, “Introduction to Symbian OS” (2005), available at https://dsg.tuwien.ac.at/Teaching/Courses/symbian/SymbianOS.pdf (“Aiello”)
1031	Raento, Mika et al., <i>ContextPhone: A Prototyping Platform for Context-Aware Mobile Applications</i> , 4 IEEE PERVASIVE COMPUTING 51 (2005) (“Raento”)
1032	Patrick, Beau, Dylan Austin, & Charles O. Connor, <i>The Effect of Smartphone on the Society</i> , 4 IDOSR J. COMP. & APPLIED SCI, at 2 (2019) (“Patrick”)
1033	U.S. Patent No. 12,159,310 File History (“FH310”)
1034	Excerpts from Yuan, Michael Juntao & Kevin Sharp, <i>Developing Scalable Series 40 Applications: A Guide For Java Developers</i> (Dec. 2004) (“Yuan”)
1035	Siegemund, Frank, and Muhammad Haroon, <i>Using Digital Cameras for Text Input on Mobile Devices</i> , in Fifth Annual IEEE Int’l Conference on Pervasive Computing and Communications (PerCom’07) 1-8 (2007) doi: 10.1109/PERCOM.2007.38 (“Siegemund”)
1036	Westerman, Peter, <i>EasCorp Expands Capture</i> , CREDIT UNION TIMES (March 16, 2010), https://www.cutimes.com/2010/03/16/eascorpexpands-capture/ (“Westerman”)
1037	EasCorp, “EasCorp News” (Nov. 13, 2007), available at https://web.archive.org/web/20071113205105/http://www.eascorp.org:80/ (“EasCorp”)
1038	EasCorp, “eServices” (May 16, 2008), available at https://web.archive.org/web/20080516093021/http://www.eascorp.org/prodserv/Prod_EServ.aspx (“eServices”)
1039	Hariharan, Kulathumani, <i>Best Practices: Extending Enterprise Applications to Mobile Devices</i> , ARCHITECTURE J. (2008), available at https://web.archive.org/web/20080115152143/http://msdn2.microsoft.com:80/en-us/arcjournal/default.aspx (“Hariharan”)

Ex. No.	Description
1040	CodeGuru Staff, Using a Camera with Windows Mobile 5, codeguru.com, July 21, 2006, available at https://www.codeguru.com/multimedia/using-a-camera-withwindows-mobile-5/ (“CodeGuru”)
1041	PTAB-IPR2021-01077 Final Written Decision (“559-FWD”)
1042	USAA v. PNC Bank N.A., No. 23-2171 (Fed. Cir. Jan. 30, 2025) (nonprecedential) (“PNC”)
1043	U.S. Patent No. 7,156,311 (“Attia”)
1044	U.S. Patent No. 7,978,900 (“Nepomniachtchi”)
1045	Chinese Patent Application Publication No. CN 1967565A and Declaration of Translation (“Zhu”)
1046	U.S. Patent Application Publication No. 2010/0082444 (“Lin”)
1047	PTAB-IPR2022-00075 Final Written Decision (“136-FWD”)
1048	U.S. Patent Application Publication No. 2006/0106717 (“Randle”)
1049	U.S. Patent Application Publication No. 2005/0035193A1 (“Gustin”)
1050	U.S. Patent Application No. 2003/0128875 (“Pilu”)
1051	U.S. Patent Application Publication No. 2008/0297617 (“Jeong”)
1052	Katta, Sanketh, <i>LG enV Touch (VX-11000) Review</i> , SKATTER (July 21, 2009), https://www.skatter.com/lg-env-touch-vx-11000-review/ (“VX-11000”)
1053	U.S. Patent Application Publication No. 2007/0082700 (“Landschaft”)
1054	U.S. Patent Application Publication No. 2009/0192813 (“Gejdos”)
1055	Merino, Carlos & Majid Mirmehdi, <i>A Framework Towards Real-time Detection and Tracking of Text</i> , PROCS. OF THE SECOND INT’L WORKSHOP ON CAMERA-BASED DOCUMENT ANALYSIS AND RECOGNITION 10 (Koichi Kise & David S. Doermann eds., Sept. 22, 2007) (“Merino”)
1056	Haro, Antonio et al., “Mobile Camera-Based Adaptive Viewing,” Nokia Research Center 78 (Dec. 8, 2005) (“Haro”)
1057	U.S. Patent No. 6,195,651 (“Handel”)
1058	Series 60 Platform, “Series 60 Platform FAQ,” Apr. 1, 2004, available at https://web.archive.org/web/20040401020848/http://series60.com/faq (“Series60”)

Ex. No.	Description
1059	Excerpts from Topley, Kim, J2ME in a Nutshell, Apr. 23, 2002 (“Topley”)
1060	USAA v. PNC Bank N.A., No. 23-2124 (Fed. Cir. Feb. 3, 2025) (nonprecedential) (“PNC2”)
1061	Xerox Document Services Platform Generic MICR Fundamentals Guide, Jan. 2003, https://download.support.xerox.com/pub/docs/DocuPrint_100_100MX/userdocs/any-os/en/MICRFundFinal_701P22140.pdf (“Xerox”)
1062	Declaration from June Munford (“Munford”)
1063	Woyke, Elizabeth, <i>Nokia’s Gigantic App Store</i> , FORBES (May 7, 2009), https://www.forbes.com/2009/05/07/nokia-ovi-storetechnology-wireless-nokia.html (“Ovi”)
1064	Nokia Oyj, <i>Nokia Opens Online Software Shop</i> (Nov. 27, 2001), https://www.globenewswire.com/newsrelease/2001/11/27/1845381/0/en/Nokia-opens-online-softwareshop.html (“Software-Market”)
1065	GetJar, <i>The App Store for the Three Billion People Who Don’t Have an iPhone GetJar Passes 300 Million Mobile Application Downloads</i> (Aug. 19, 2008), https://www.globenewswire.com/newsrelease/2008/08/19/1207826/0/en/The-App-Store-for-the-Three-Billion-People-Who-Don-t-Have-an-iPhone.html (“GetJar”)
1066	PRNewswire, <i>(PRN) Handango Releases Smartphone Content Statistics In 2006 Yardstick</i> (Feb. 12, 2007), https://www.chron.com/news/article/prn-handango-releasessmartphone-content-1806923.php (“Handango”)
1067	Lee, Wei-Meng, <i>Programming Windows Mobile 5.0 Applications Using the .NET Compact Framework</i> , CODE MAGAZINE (Aug. 18, 2006), https://www.codemag.com/article/0609051/Programming-Windows-Mobile-5.0-Applications-Using-the-.NET-Compact-Framework (“Windows”)
1068	ForumNokia, “S60 Platform: Camera Example with AutoFocus Support,” Apr. 12, 2008, available at https://web.archive.org/web/20080412151729/http://forum.nokia.com/info/sw.nokia.com/id/9fd0e9a7-bb4b-489d-84acb19b4ae93369/S60_Platform_Camera_Example_with_AutoFocus_Support.html (“Symbian”)

Ex. No.	Description
1069	Apple Developers, UIImagePickerController (2025), https://developer.apple.com/documentation/uikit/uiimagepickercontroller (“AppleDevelopers”)
1070	Palm OS® Platform Developer Guide Software and Hardware, Nov. 22, 2006, http://apitechwriter.com/Samples/Palm/PalmOS_Developer_Guide.pdf (“PalmOne”)
1071	Haritaoglu, Esin Darici & Ismail Haritaoglu, <i>Document Recognition and Translation with Handheld Mobile Devices</i> , in Proceedings of the 2005 Symposium on Document Image Understanding Technology 55-62 (2005) (“Haritaoglu”)
1072	Bae, K. S. et al., <i>Character Recognition System for Cellular Phone with Camera</i> , in Proceedings of the 29th Annual Int’l Computer Software and Applications Conference (COMPSAC 2005) 539-44 (2005) doi: 10.1109/COMPSAC.2005.55 (“Bae”)
1073	Zhang, Mi et al., <i>OCRDroid: A Framework to Digitize Text Using Mobile Phones</i> , in Mobile Computing, Applications, and Services 273-92 (2009) (“Zhang”)
1074	Koga, Masashi et al., <i>Camera-based Kanji OCR for Mobile-phones: Practical Issues</i> , in Eighth Int’l Conference on Document Analysis and Recognition (ICDAR’05) 635-39 (2005) doi: 10.1109/ICDAR.2005.65 (“Koga”)
1075	Ferreira, Silvio, Vincent Garin, & Bernard Gosselin, <i>A Text Detection Technique Applied in the Framework of a Mobile Camera-based Application</i> , in Proceedings of the First Int’l Workshop on Camera-based Document Analysis and Recognition (CBDAR) 133-39 (2005) (“Ferreira”)
1076	Laine, Mikael & Olli S. Nevalainen. <i>A Standalone OCR System for Mobile Cameraphones</i> , 2006 IEEE 17th Int’l Symposium on Personal, Indoor and Mobile Radio Comm’ns 1-5 (2006) doi: 10.1109/PIMRC.2006.254074 (“Laine”)
1077	Zhou, Steven Zhiying, Syed Omer Gilani, & Stefan Winkler, <i>Open Source OCR Framework Using Mobile Devices, Multimedia on Mobile Devices</i> , in 6821 Proceedings of the SPIE 1-6 (2008) (“Zhou”)

Ex. No.	Description
1078	Liu, Xu & David Doermann, <i>Mobile Retriever – Finding Document with a Snapshot</i> , PROCS. OF THE SECOND INT’L WORKSHOP ON CAMERA-BASED DOCUMENT ANALYSIS AND RECOGNITION 29-34 (Koichi Kise & David S. Doermann eds., Sept. 22, 2007) (“Liu”)
1079	Wu, Victor, R. Manmatha, & Edward M. Riseman, <i>Finding Text in Images</i> , Proceedings of the Second ACM Int’l Conference on Digital Libraries 3-12 (July 1, 1997) (“Wu”)
1080	CNN.com, “First Mobile Videophone Introduced,” May 18, 1999, available at https://web.archive.org/web/20080614223224/https://www.cnn.com/TECH/ptech/9905/18/japan.phonetv/ (“Kyocera”)
1081	Notice of Petitioner’s <i>Sotera</i> Stipulation (“Stipulation”)
1082	Petitioner’s Invalidity Contentions Exhibit B24 in <i>United Servs. Auto. Ass’n v. Regions Bank</i> , No. 2:25-cv-00082-JRG (E.D. Tex.) served July 9, 2025 (“ScanZoom”)
1083	Petitioner’s Invalidity Contentions Exhibit B22 in <i>United Servs. Auto. Ass’n v. Regions Bank</i> , No. 2:25-cv-00082-JRG (E.D. Tex.) served July 9, 2025 (“RedLaser”)
1084	Petitioner’s Invalidity Contentions Exhibit B19 in <i>United Servs. Auto. Ass’n v. Regions Bank</i> , No. 2:25-cv-00082-JRG (E.D. Tex.) served July 9, 2025 (“CAM”)
1085	Petitioner’s Invalidity Contentions Exhibit B21 in <i>United Servs. Auto. Ass’n v. Regions Bank</i> , No. 2:25-cv-00082-JRG (E.D. Tex.) served July 9, 2025 (“MotoRokr”)
1086	Petitioner’s Invalidity Contentions Exhibit B23 in <i>United Servs. Auto. Ass’n v. Regions Bank</i> , No. 2:25-cv-00082-JRG (E.D. Tex.) served July 9, 2025 (“WVUFCU”)
1087	Petitioner’s Invalidity Contentions Exhibit B20 in <i>United Servs. Auto. Ass’n v. Regions Bank</i> , No. 2:25-cv-00082-JRG (E.D. Tex.) served July 9, 2025 (“ImageNet”)
1088	Settlement Agreement

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on March 23, 2026, a true and correct copy of the foregoing **JOINT MOTION TO TERMINATE, TABLE OF EXHIBITS**, and **EXHIBIT 1088** was served on Patent Owner via electronic mail to:

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