UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

VOLEX PLC,
Petitioner

v.

CREDO TECHNOLOGY GROUP LTD.,
Patent Owner

Case No. IPR2025-01387
Patent No. 11,032,111

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

LISTING OF EXHIBITS

Exhibit	Description
1001	United States Patent No. 11,032,111 ("the '111 Patent")
1002	Prosecution History of United States Patent No. 11,032,111
1003	Declaration of Ayman Fayed, Ph.D.
1004	Curriculum Vitae of Ayman Fayed, Ph.D.
1005	United States Patent No. 9,882,706 ("Lugthart-706")
1006	United States Patent Publication No. 2014/0281067 ("Das Sharma")
1007	United States Patent No. 7.239,665 ("Mezer")
1008	United States Patent No. 8,787,430 ("Raghavan")
1009	United States Patent No. 9,806,812 ("Schmidt")
1010	United States Patent No. 9,137,063 ("Zerbe-063")
1011	United States Patent No. 7,308,058 ("Zerbe-058")
1012	United States Patent No. 8,477,835 ("Zerbe-835")
1013	United States Patent No. 9,152,257 ("McCall")
1014	United States Patent No. 9,118,512 ("Gotman")
1015	United States Patent No. 10,736,201 ("Burchardt")
1016	United States Patent No. 7,664,171 ("Sun")
1017	United States Patent No. 6,680,681 ("Hsu")
1018	United States Patent Publication No. 2013/0223506 ("Kolze")
1019	United States Patent Publication No. 2010/0232493 ("Thirumoorthy")
1020	PCT Publication No. 2016/203205 ("Griffin")
1021	United States Patent No. 9,495,245 ("Peddle")
1022	United States Patent No. 5,854,921 ("Pickett")
1023	United States Patent Publication No. 2004/0071203 ("Gorecki")
1024	IEEE Std. 802.3-2015, "IEEE Standard for Ethernet: Section 5" ("802.3- 2015 Section 5")
1025	*Insertion loss*, Newton's Telecom Dictionary (31st ed. 2018) ("Newton's")
1026	*Insertion loss, package, loss, dissipation*, Oxford – A Dictionary of Electronics and Electrical Engineering (5th ed. 2018) ("Oxford")
1027	IEEE Std. 802.3bs-2017 "IEEE Standard for Ethernet: Amendment 10: Media Access Control Parameters, Physical Layers, and Management Parameters for 200 Gb/s and 400 Gb/s Operation" (2017) ("802.3bs").
1028	Optical Internetworking Forum Implementation Agreement, "Common Electrical I/O (CEI) - Electrical and Jitter Interoperability agreements for 6G+ bps, 11G+ bps,25G+ bps I/O and 56G+ bps," OIF-CEI-04.0 (Dec. 29, 2017) ("OIF-CEI-04.0")

Exhibit	Description
1029	United States Patent Publication No. 2015/0189092 (“Thapa”)
1030	United States Patent No. 9,088,336 (“Mani”)
1031	United States Patent No. 9,754,605 (“Chhetri”)
1032	Optical Internetworking Forum, “OIF Next Generation Interconnect Framework,” OIF-FD-Client-400G/1T-01.0 (2013) (“OIF-FD-Client-400G/1T-01.0”)
1033	Declaration of Paul S. Min, Ph.D., together with Dr. Min’s c.v., which are Exhibits 1003 and 1004 in Case No. IPR2025-00699
1034	*Intentionally left blank*
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1044	Settlement Agreement **[CONFIDENTIAL]**

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 on August 29, 2025, Petitioner Volex plc and Patent Owner Credo Technology Group Ltd. (collectively, the "Parties") hereby provide notice that they have reached a settlement agreement and jointly request termination of the *inter partes* review of U.S. Patent No. 11,032,111 (the "'111 Patent"), Case No. IPR2025-01387, with the United States Patent and Trademark Office.

I. TERMINATION IS APPROPRIATE

The basis for this Joint Motion is the settlement of all disputes between the Parties relating to the '111 Patent. Patent Owner filed suit in district court against Petitioner asserting patent infringement based on *inter alia* the '111 Patent. *Credo Semiconductor Inc. et al. v. Volex PLC*, No. 2:25-cv-00298 (E.D. Tex.), filed March 13, 2025. Patent Owner also filed a Complaint with the United States International Trade Commission alleging patent infringement by Petitioner based on *inter alia* the '111 Patent. *In re Certain Active Electrical Cables and Components Thereof*, Inv. No. 337-TA-1446, filed March 13, 2025. Petitioner was subsequently dropped as a respondent from that ITC Investigation.

On August 22, 2025, the Parties entered into a Settlement Agreement, under which the Parties agreed to terminate this proceeding, IPR2025-01387.

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).

II. 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).

III. 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 copy of the Parties' Settlement Agreement is being submitted as Exhibit 1044. The Settlement Agreement is in writing and constitutes the Parties' entire understanding and agreement. The Parties certify that there are no collateral 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.

IV. CONCLUSION

Termination of the proceeding is a just and fair resolution. The Parties agree that neither Petitioner nor Patent Owner will be prejudiced by the termination of this proceeding. Last, the Parties will benefit from preserving resources that would otherwise be expended if this motion is denied. For at least the foregoing reasons, the Parties respectfully request that the Board terminate *Inter Partes* Review No. IPR2025-01387.

Dated: August 29, 2025

/Eric S. Lucas/

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CERTIFICATE OF SERVICE UNDER 37 C.F.R. §42.6(e)(4)

I certify that on August 29, 2025, a copy of the foregoing document, including any exhibits or appendices filed therewith, is being served via electronic mail, as previously consented to by Patent Owner, upon the following:

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