

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

BOSE CORPORATION,
Petitioner,

v.

INGENIOSPEC, LLC,
Patent Owner.

Case No. IPR2025-01547
Patent No. 8,852,789

JOINT MOTION TO TERMINATE PROCEEDING

LISTING OF EXHIBITS

Exhibit	Description
1001	U.S. Patent No. 8,582,789
1002	Prosecution History of U.S. Patent No. 8,582,789
1003	Declaration of Prof. David V. Anderson, Ph.D.
1004	CV of Prof. David V. Anderson, Ph.D.
1005	U.S. Patent No. 7,388,962
1006	U.S. Patent Application Publication No. 2004/0208333 (“Cheung”)
1007	U.S. Patent Appl. No. 10/826,527 (“Priority Application”)
1008	U.S. Patent Application Publication No. 2004/0136555 (“Enzmann”)
1009	Prosecution History of U.S. Patent No. 7,388,962
1010	WIPO Patent Application Publication No. WO 01/54458 A2 (“Eaton”)
1011	U.S. Patent Application Publication No. 2001/0041602 (“Berger”)
1012	U.S. Patent No. 5,636,285 (“Sauer”)
1013	WIPO Patent Application Publication No. WO 98/31193 A1 (“Fretz”)
1014	U.S. Patent No. 6,389,142 (“Hagen”)
1015	WIPO Patent Application Publication No. WO 99/05840 A1 (“DeJaco”)
1016	U.S. Patent No. 3,829,623 (“Willis”)
1017	U.S. Statutory Invention Registration H417 (“Miles”)
1018	<i>IngenioSpec, LLC v. Bose Corp.</i> , 2:24-cv-00822 (E.D. Tex.), Dkt. No. 1-7 (Exhibit 7 to Complaint)
1019	<i>IngenioSpec, LLC v. Sony Corp.</i> , 2:24-cv-00820 (E.D. Tex.), Dkt. No. 1-8 (Exhibit 8 to Complaint)
1020	<i>IngenioSpec, LLC v. Samsung Elecs. Co.</i> , 2:24-cv-00819 (E.D. Tex.), Dkt. No. 1-9 (Exhibit 9 to Complaint)
1021	<i>IngenioSpec, LLC v. LG Elecs., Inc.</i> , 2:24-cv-00823 (E.D. Tex.), Dkt. No. 1-8 (Exhibit 8 to Complaint)
1022	U.S. Patent Application Serial No. 10/826,529

1023	WIPO Patent Application Publication No. WO 1991/015902 A1
1024	U.S. Patent Application Publication No. 2002/0141599 A1
1025	WIPO Patent Application Publication No. WO 2001/028310 A2
1026	U.S. Patent Application Publication No. 2002/0031228 A1
1027	Wayne Tomasi, <i>Electronic Communications Systems: Fundamentals Through Advanced</i> (4th Ed. 2001)
1028	U.S. Patent No. 4,792,977
1029	U.S. Patent Application Publication No. 2002/0176584 A1
1030	U.S. Patent No. 3,946,168
1031	U.S. Patent No. 6,134,334
1032	U.S. Patent Application Publication No. 2002/0067825 A1
1033	U.S. Patent Application Publication No. 2002/0111197 A1
1034	U.S. Patent No. 6,006,115
1035	European Patent No. 1,161,064 B1
1036	Oxford English Reference Dictionary (2nd Ed. 1996)
1037	U.S. Patent No. 2,112,569
1038	U.S. Patent No. 4,335,281
1039	U.S. Patent No. 2,305,905
1040	U.S. Patent No. 2,484,052
1041	European Patent No. 1,372,353 B1
1042	WIPO Patent Application Publication No. WO 02/25906 A2
1043	GB Patent No. 604,357
1044	U.S. Patent No. 2,411,190
1045	European Patent Appl. Publ. No. 0,002,051 A1
1046	U.S. Patent No. 2,744,158
1047	U.S. Patent No. 4,284,847
1048	U.S. Patent Appl. No. 10/826,531

1049	U.S. Patent Appl. No. 10/826,528
1050	U.S. Patent Appl. No. 10/826,537
1051	U.S. Patent No. 3,531,595
1052	U.S. Patent Appl. Publ. No. 2002/0068610
1053	U.S. Patent Appl. Publ. No. 2002/0069031
1054	U.S. Patent No. 5,047,860
1055	Settlement Agreement [CONFIDENTIAL]

Pursuant to 37 C.F.R § 42.74 and the authorization provided by the Board on October 21, 2025, Petitioner Bose Corporation (“Bose”) and Patent Owner IngenioSpec, LLC (“IngenioSpec”) jointly request termination of this proceeding, IPR2025-01547, which challenges all claims of U.S. Patent No. 8,852,789 (“the ’789 Patent”).

Bose and IngenioSpec have resolved their dispute regarding the ’789 Patent, including both this proceeding and Bose’s declaratory judgment action seeking a declaration of non-infringement of the ’789 Patent, *Bose Corp. v. IngenioSpec, LLC*, 1-25-cv-10240 (D. Mass.). The parties do not anticipate further litigation between them concerning the ’789 Patent. Contemporaneous with this motion, the parties are filing substantively identical motions to terminate three related proceedings involving patents owned by IngenioSpec that are also at issue in Bose’s declaratory judgment action.

Good cause exists to terminate this proceeding because the parties have resolved their dispute regarding the ’789 Patent and the proceeding is still at an early stage with IngenioSpec not having yet filed its patent owner preliminary response. Terminating the proceeding now would thus serve the interests of judicial economy as well as the mutual interest of the parties.

A true and correct copy of the parties’ settlement agreement will be filed as Exhibit 1055, along with a joint motion to treat the settlement agreement as

confidential business information. 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 the proceeding.

Respectfully submitted,

/s/ Reza Mirzaie

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October 22, 2025

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

I certify that on October 22, 2025, I will cause a copy of the foregoing document, including any exhibits filed therewith, to be served via electronic mail, as previously consented to by Patent Owner, upon the following:

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