

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

BOSE CORPORATION,
Petitioner,

v.

INGENIOSPEC, LLC,
Patent Owner.

Case No. IPR2025-01549
Patent No. 11,852,901

JOINT MOTION TO TERMINATE PROCEEDING

LISTING OF EXHIBITS

Exhibit	Description
1001	U.S. Patent No. 11,852,901 (“the ’2901 patent”)
1002	Prosecution History of U.S. Patent No. 11,852,901
1003	Declaration of Andrew P. DeJaco
1004	Curriculum Vitae of Andrew P. DeJaco
1005	W.O. Pub. No. 2003/056790 A1 (“Goh”)
1006	U.S. Patent No. 7,925,029 (“Hollemans”)
1007	W.O. Pub. No. 2004/093490 A1
1008	U.S. Patent No. 4,882,745 (“Silver”)
1009	U.S. Patent Application Publication No. 2002/0137530
1010	U.S. Patent No. 5,113,428 (“Fitzgerald”)
1011	U.S. Patent Application No. 11/546,685 (“the ’685-Application”)
1012	U.S. Patent Application Publication No. 2007/0030442 (“Howell-442”)
1013	U.S. Patent Application No. 11/183,262 (“the ’262-Application”)
1014	U.S. Patent Application No. 11/006,343 (“the ’343-Application”)
1015	U.S. Patent Application No. 11/183,283 (“the ’283-Application”)
1016	U.S. Patent No. 7,116,976
1017	U.S. Patent Application Serial No. 12/803,732 (“the ’732-Application”)
1018	U.S. Patent Application Serial No. 13/831,445
1019	U.S. Patent Application Serial No. 16/429,181
1020	U.S. Patent Application Publication No. 2001/0041602 (“Berger”)
1021	W.O. Pub. No. 2001/63888 A1 (“Irvin”)
1022	U.S. Patent No. 5,359,647 (“Regen”)
1023	U.S. Patent Application Publication No. 2005/0124324
1024	U.S. Patent Application Publication No. 2002/0094806
1025	U.S. Provisional Application No. 60/583,169 (“the ’169-Provisional”)
1026	U.S. Patent No. 5,429,889
1027	U.S. Patent Application Publication No. 2003/0222622
1028	U.S. Patent Application Publication No. 2003/0214268

1029	U.S. Patent No. 7,283,635
1030	U.S. Patent Application Publication No. 2001/0011964
1031	U.S. Patent No. 6,453,018
1032	U.S. Patent No. 6,122,510
1033	W.O. Pub. No. 2000/005861 A1
1034	U.S. Statutory Invention Registration H417
1035	U.S. Patent No. 6,549,586
1036	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, IPR2025-01549, which challenges all claims of U.S. Patent No. 11,852,901 (“the ’2901 Patent”).

Bose and IngenioSpec have resolved their dispute regarding the ’2901 Patent, including both this proceeding and Bose’s declaratory judgment action seeking a declaration of non-infringement of the ’2901 Patent, *Bose Corp. v. IngenioSpec, LLC*, 1-25-cv-10240 (D. Mass.). The parties do not anticipate further litigation between them concerning the ’2901 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 ’2901 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 1036, 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

Reza Mirzaie, Reg. No. 69,138
RUSS AUGUST & KABAT
12424 Wilshire Blvd., 12th Floor
Los Angeles, CA 90025
Tel: 310-826-7474
Fax: 310-826-6991

*Counsel for Patent Owner
IngenioSpec, LLC*

/Michael N. Rader/

Michael N. Rader, Reg. No. 52,146
WOLF, GREENFIELD & SACKS, P.C
600 Atlantic Avenue
Boston, MA 02210
Tel: (617) 646-8000
Fax: (617) 646-8646

*Counsel for Petitioner
Bose Corporation*

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:

Reza Mirzaie	rmirzaie@raklaw.com
Marc A. Fenster	mfenster@raklaw.com
Benjamin T. Wang	bwang@raklaw.com
Matthew Aichele	maichele@raklaw.com
	rak_ingeniospec@raklaw.com

Date: October 22, 2025

/MacAulay Rush/
MacAulay Rush
Paralegal
WOLF, GREENFIELD & SACKS, P.C.