

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

NIUM PTE. LTD,
Petitioner

v.

INTERCURRENCY SOFTWARE LLC,
Patent Owner.

Case No. IPR2025-01586
U.S. Patent No. 11,620,701

JOINT MOTION TO TERMINATE PROCEEDING

Pursuant to 35 U.S.C. § 317(a) and 37 C.F.R. § 42.74, Petitioner Nium PTE. Ltd and Patent Owner Intercurrency Software LLC (collectively, the “Parties”), through their respective counsel of record, jointly request termination of this proceeding in view of the Parties’ resolution of their dispute relating to U.S. Patent No. 11,620,701 (the “’701 Patent”). The Board authorized the filing of this Joint Motion to Terminate via e-mail dated February 24, 2026.

Termination with respect to Petitioner and Patent Owner is appropriate in the instant proceeding because the dispute between the parties has been resolved. The Parties have reached a confidential settlement of their dispute with respect to the ’701 Patent, which includes an agreement to terminate this and all related proceedings. The confidential settlement agreement between Petitioner and Patent Owner has been made in writing, and a true and correct copy of the settlement agreement between the Parties is filed concurrently with this motion as Exhibit 1035 (which is submitted as “Parties and Board Only”), pursuant to 35 U.S.C. § 317(b), along with a separate Joint Request to Treat as Confidential and Keep Separate Pursuant to 35 U.S.C. § 317(b). The Parties certify that there are no other collateral agreements or understandings, oral or written, between the Parties made in connection with, or in contemplation of, the termination of this proceeding. The Parties request that the settlement agreement be treated as business confidential information, be kept separate from the files of the involved patent, and be made available only pursuant to 35 U.S.C. § 317 and 37 C.F.R. § 42.74(c).

Pursuant to 37 C.F.R. §§ 42.5 and 42.72, the Board may terminate a trial without rendering a final written decision, where appropriate, including pursuant to a joint request under 35 U.S.C. §§ 317(a). *See Winplus N. Am., Inc. v. Pilot, Inc.*, IPR2018-00488, Paper 12 (PTAB Oct. 24, 2018). “There are strong public policy reasons to favor settlement between the parties to a 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.” PTAB Consolidated Trial Practice Guide at 86 (November 2019).

This proceeding is being reviewed for merits and non-discretionary considerations pursuant to the Director Discretionary Decision dated February 3, 2026, Paper 8. As such, the Board has not already decided the merits, making termination appropriate under 34 C.F.R. § 42.72. Moreover, the parallel litigations will be dismissed pursuant to the Parties’ settlement agreement.

Therefore, for the foregoing reasons, Petitioner and Patent Owner jointly request termination of this proceeding.

PETITIONER'S UPDATED EXHIBIT LIST
(Adding Exhibit 1035)

No.	Reference	Referred to As
1001	U.S. Patent No. 11,620,701	'701 Patent
1002	Prosecution History of U.S. Patent No. 11,620,701	'701 Patent File History
1003	Declaration of Marc Reid	Reid Decl.
1004	U.S. Patent Pub. US2002/0087454A1	Calo
1005	U.S. Patent Pub. US2006/0095361A1	Rude
1006	U.S. Patent Pub. US2004/0236664A1	Sellberg
1007	U.S. Patent Pub. US2002/0023053 A1	Szoc
1008	U.S. Patent Pub. US2004/0267655A1	Davidowitz
1009	Complaint, <i>Intercurrency Software LLC v. Nium Pte. Ltd.</i> , 2:25-cv-701 (E.D. Tex. July 9, 2025), Dkt. 1	Original Complaint
1010	Patent Owner's Infringement Contentions	Infringement Contentions
1011	<i>Askelladden LLC v. Intercurrency Software LLC</i> , IPR2024-00375, Paper 17, Final Written Decision (PTAB, Jul. 1, 2025)	'863 Patent FWD
1012	<i>Askelladden LLC v. Intercurrency Software LLC</i> , IPR2024-00376, Paper 16, Final Written Decision (PTAB, Jul. 14, 2025)	'107 Patent FWD I
1013	<i>Askelladden LLC v. Intercurrency Software LLC</i> , IPR2024-00377, Paper 16, Final Written Decision (PTAB, Jul. 14, 2025)	'107 Patent FWD II
1014	<i>Askelladden LLC v. Intercurrency Software LLC</i> , IPR2024-00378, Paper 17, Final Written Decision (PTAB, Jul. 1, 2025)	'930 Patent FWD
1015	Dagfinn Rime, <i>New Electronic Trading Systems in Foreign Exchange Markets</i> , New Economy Handbook, Chapter 21, pp. 469-504 (2003)	Electronic Trading Systems
1016	Lawrence J. Gitman & Michael D. Joehnk, <i>Fundamentals of Investing</i> (5th ed. 1993)	Fundamentals of Investing

No.	Reference	Referred to As
1017	Peter Rosenstreich, <i>FOREX Revolution, An Insider's Guide to the Real World of Foreign Exchange Trading</i> 24-25 (1995). Library of Cong.: Cat. No. 2005921697	Rosenstreich
1018	Cornelius Luca, <i>Trading in the Global Currency Markets, An Insider's Guide to the Real World of Foreign Exchange Trading</i> (2005). Library of Cong.: ISBN 0-13-293424-8, HG3851.L83 1995	Luca
1019	Traders Magazine, <i>OMS Solutions: The Buysides Key to the Trading Highway</i> , Editorial Staff, July 5, 2006	Traders Magazine
1020	Screenshot of DocketNavigator Search for district court litigations asserting the '701 Patent	'701 Patent District Court Litigations
1021	Side-by-Side Comparison of claim 1 of the '701 Patent with the Related Patents	Side-by-Side Claim Comparison
1022	Complaint, <i>Intercurrency Software LLC v. Skrill Limited</i> , 2:25-cv-702 (E.D. Tex. July 9, 2025), Dkt. 1	Skrill Complaint
1023	Complaint, <i>Intercurrency Software LLC v. WorldRemit Limited</i> , 2:25-cv-703 (E.D. Tex. July 10, 2025), Dkt. 1	WorldRemit Complaint
1024	Complaint, <i>Intercurrency Software LLC v. Xe Corp.</i> , 2:25-cv-456 (E.D. Tex. May 1, 2025), Dkt. 1	Xe Complaint
1025	Complaint, <i>Intercurrency Software LLC v. CurrencyFair Ltd.</i> , 2:25-cv-83 (E.D. Tex. Jan. 28, 2025), Dkt. 1	CurrencyFair Complaint
1026	Complaint, <i>Intercurrency Software LLC v. TTT MoneyCorp Ltd.</i> , 2:25-cv-56 (E.D. Tex. Jan. 21, 2025), Dkt. 1	TTT Moneycorp Complaint
1027	Complaint, <i>Intercurrency Software LLC v. Tor Currency Exchange Ltd.</i> , 2:25-cv-57 (E.D. Tex. Jan. 21, 2025), Dkt. 1	Tor Complaint

No.	Reference	Referred to As
1028	Complaint, <i>Intercurrency Software LLC v. OFX Group Ltd.</i> , 2:24-cv-1066 (E.D. Tex. Dec. 19, 2024), Dkt. 1	OFX Complaint
1029	Complaint, <i>Intercurrency Software LLC v. Xe.com Inc.</i> , 2:24-cv-1059 (E.D. Tex. Dec. 18, 2024), Dkt. 1	Xe.com Complaint
1030	Complaint, <i>Intercurrency Software LLC v. Airwallex (Singapore) Pty. Ltd.</i> , 2:24-cv-1011 (E.D. Tex. Dec. 9, 2024), Dkt. 1	Airwallex Complaint
1031	Complaint, <i>Intercurrency Software LLC v. MoneyMovr Ltd.</i> , 2:24-cv-1012 (E.D. Tex. Dec. 9, 2024), Dkt. 1	MoneyMovr Complaint
1032	Complaint, <i>Intercurrency Software LLC v. Wise PLC</i> , 2:24-cv-976 (E.D. Tex. Nov. 26, 2024), Dkt. 1	Wise Complaint
1033	Excerpts of Petitioner's Responses to Patent Owner's First Set of Interrogatories in <i>Intercurrency Software LLC v. Nium Pte. Ltd.</i> , 2:25-cv-701 (E.D. Tex.)	Petitioner's Response to Patent Owner's Interrogatory No. 1
1034	Stipulation regarding 35 U.S.C. §§ 102 and 103 challenges in <i>Intercurrency Software LLC v. Nium Pte. Ltd.</i> , 2:25-cv-701 (E.D. Tex.)	Stipulation regarding §§ 102 and 103 challenges
1035	Joint Settlement and License Agreement	

Dated: February 27, 2026

Respectfully submitted,

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COUNSEL FOR PATENT OWNER

CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6(e), the undersigned certifies that on February 27, 2026, a copy of the attached Joint Motion to Terminate Proceeding and Exhibit 1035 was electronically served on the following counsel of record for Patent Owner:

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Date: February 27, 2026

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