

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

PLAID INC.,
Petitioner,

v.

SIX TREES CAPITAL LLC
and
SECURE AUTHENTICATION TECHNOLOGIES LLC,
Patent Owner.

IPR2026-00157
U.S. Patent No. 11,315,090

JOINT MOTION TO TERMINATE PROCEEDINGS

PATENT OWNER’S EXHIBIT LIST

Ex2001	Opposition to Defendant Plaid Inc.’s Motion to Dismiss Under Federal Rule of Civil Procedure 12(b)(6), <i>Secure Authentication Technologies LLC v. Plaid Inc.</i> , No. 2:25-cv-00514-DAK-JCB (D. Utah Oct. 02, 2025), ECF No. 30
Ex2002	Reply in Support of Defendant Plaid Inc.’s Motion to Dismiss Under Federal Rule of Civil Procedure 12(b)(6), <i>Secure Authentication Technologies LLC v. Plaid Inc.</i> , No. 2:25-cv-00514-DAK-JCB (D. Utah Oct. 16, 2025), ECF No. 32
Ex2003	Plaid Inc.’s Presentation for Hearing on Plaid’s Motion to Dismiss Under Federal Rule of Civil Procedure 12(b)(6), <i>Secure Authentication Technologies LLC v. Plaid Inc.</i> , No. 2:25-cv-00514-DAK-JCB (D. Utah Feb. 26, 2026)
Ex2004	Secure Authentication Technologies LLC’s Presentation for Hearing on Plaid’s Motion to Dismiss Under Federal Rule of Civil Procedure 12(b)(6), <i>Secure Authentication Technologies LLC v. Plaid Inc.</i> , No. 2:25-cv-00514-DAK-JCB (D. Utah Feb. 26, 2026)
Ex2005	District of Utah Local Patent Rules, https://www.utd.uscourts.gov/sites/utd/files/Patent%20Rules%20Final%202023.pdf (Dec. 2023)
Ex2006	U.S. Patent No. 10,268,995 to Zimmerman et al.
Ex2007	Max, https://web.archive.org/web/20220512230445/https://www.maxmyinterest.com/ (May 12, 2022)
Ex2008	Declaration of Gary Zimmerman
Ex2009	Memorandum Decision and Order Granting Plaid, Inc.’s Motion to Dismiss, <i>Secure Authentication Technologies LLC v. Plaid Inc.</i> , No. 2:25-cv-00514-DAK-JCB (D. Utah Apr. 1, 2025), ECF No. 44
Ex2010	Judgment, <i>Secure Authentication Technologies LLC v. Plaid Inc.</i> , No. 2:25-cv-00514-DAK-JCB (D. Utah Apr. 1, 2025), ECF No. 45

Ex2011	Stipulation re Order on Motion to Dismiss, <i>Secure Authentication Technologies LLC v. Plaid Inc.</i> , No. 2:25-cv-00514-DAK-JCB (D. Utah Apr. 14, 2025), ECF No. 48
Ex2012	Termination Agreement

Pursuant to 35 U.S.C. § 317(a) and 37 C.F.R. § 42.74, Petitioner Plaid Inc. and Patent Owner Secure Authentication Technologies LLC have reached a resolution and jointly move to terminate the above-captioned proceeding. On April 23, 2026, Petitioner and Patent Owner contacted the Patent Office for permission to file this motion. The Office granted permission on April 23, 2026.

Petitioner filed for IPR on January 15, 2026. Paper 1. Patent Owner filed an initial brief on discretionary denial on March 16, 2026. Paper 8. Since then, the district court in the co-pending district-court litigation invalidated all claims of the '090 patent under 35 U.S.C. § 101. Ex2009; Ex2010. With permission from the Patent Office, Patent Owner filed a supplemental brief on discretionary denial on April 17, 2026. Paper 9.

Petitioner and Patent Owner have agreed that Patent Owner will not appeal the district court's decision, that Petitioner will not move for attorney's fees, and—because all claims have been invalidated and there are no outstanding challenges to be resolved in this *inter partes* review—that the parties will jointly request for the above-captioned IPR to be terminated. Pursuant to 35 U.S.C. § 317(b) and 37 C.F.R. § 42.74(b), Petitioner and Patent Owner submit a true copy of the agreement in its entirety, filed as Exhibit 2012. There are no other collateral agreements between the Parties made in connection with, or in contemplation of, the termination sought.

The parties respectfully submit that termination is justified. The parties have met the statutory requirement that they file a “joint request” to terminate before the Office “has decided the merits of the proceeding.” 35 U.S.C. § 317(a). Under this section, IPRs “shall be” terminated upon a joint request “unless the Office has decided the merits of the proceeding before the request for termination is filed.” *Id.* As of this motion, the Office has not yet made any determinations in this proceeding, either substantive or non-substantive.

Further, in view of the district court’s decision, the parties have reached a resolution as to all the disputes in this proceeding. Termination therefore saves significant further expenditure of resources by the parties.

Pursuant to 35 U.S.C. § 317(b) and 37 C.F.R. § 42.74(b), the agreement is in writing and a true and correct copy is being filed as Exhibit 2012.

Accordingly, the parties respectfully request termination of this IPR.

Date: April 23, 2026

/Brian M. Buroker /

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CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing Joint Motion To Terminate Proceedings was served via e-mail pursuant to 37 C.F.R. §42.6(e) in its entirety to all counsel of record, as follows:

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Respectfully submitted,

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