

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

AMAZON.COM, INC. AND AMAZON.COM SERVICES LLC,
Petitioners,

V.

INTERDIGITAL MADISON PATENT HOLDINGS, SAS,
Patent Owner.

IPR2026-00195
U.S. Patent No. 10,250,877

JOINT MOTION TO TERMINATE PROCEEDINGS
PURSUANT TO 35 U.S.C. § 317

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Patent Trial and Appeal Board
U.S. Patent & Trademark Office
P.O. Box 1450
Alexandria, VA 22313-1450

EXHIBIT LIST

No.	Exhibit
1001	U.S. Patent No. 10,250,877 (“’877 Patent”)
1002	File History of the ’877 Patent
1003	Declaration of Dr. Joseph P. Havlicek in Support of Petition
1004	Dr. Joseph P. Havlicek CV
1005	Declaration of Dr. Clifford Reader
1006	Dr. Clifford Reader CV
1007	U.S. Patent No. 5,805,222 (“Nakagawa”)
1008	U.S. Application No. 2004/0150747 (“Sita”)
1009	Thomas Wiegand et al., <i>WD3: Working Draft 3 of High-Efficiency Video Coding</i> , JCTVC-E603 v.8 (June 27, 2011) (“Wiegand”)
1010	Thomas Davies, <i>Resolution switching for coding efficiency and resilience</i> , JCTVC-F158 v.4 (July 7, 2011) (“Davies”)
1011	U.S. Patent No. 6,628,714 (“Fimoff”)
1012	Joint Chart Setting Forth Parties’ Post-Hearing Claim Constructions, <i>In the Matter of Certain Electronic Devices, Including Smartphones, Computers, Tablet Computers, and Components Thereof</i> , Inv. No. 337-TA-1373 (Feb. 21, 2024)
1013	Kiran Misra, <i>AHG18/21: Absolute signaling for resolution switching</i> , JCTVC-G715 v.3 (Nov. 19, 2011) (“Misra”)
1014	U.S. Patent Application No. 2008/0089417 (“Bao”)
1015	International Patent Application No. WO 2011/127961 (“Siek-mann”)
1016	International Patent Application No. WO 1990/00780 (“Dolazza”)

No.	Exhibit
1017	U.S. Patent No. 8,199,812 (“Ye”)
1018	Alex Wiltshire, <i>How many frames per second can the human eye really see?</i> , PCGamer (Jan. 19, 2017), www.pcgamer.com/how-many-frames-per-second-can-the-human-eye-really-see/
1019	Noah Snavely, <i>Lecture 3: Image Resampling</i> , Cornell (Spring 2011), www.cs.cornell.edu/courses/cs6670/2011sp/lectures/lec03_resample.pdf
1020	BDTi, <i>How video compression works</i> , EETimes (Aug. 6, 2007), https://www.eetimes.com/how-video-compression-works/
1021	Gary J. Sullivan & Thomas Wiegand, <i>Video Compression—From Concepts to the H.264/AVC Standard</i> , 93 Proceedings of the IEEE 18 (Jan. 2005)
1022	Niels Laukens, <i>Adaptive Streaming – a brief tutorial</i> , EBU Tech. Rev. (Q1 2011)
1023	Real, <i>Infographic – The History of Digital Video File Formats</i> (Apr. 22, 2012), https://blog.real.com/digital-video-file-formats/
1024	Gavin Wright, <i>Definition: interlaced display</i> , TechTarget, https://www.techtarget.com/whatis/definition/interlaced-display
1025	A. Tamhankar & K. R. Rao, <i>An Overview of H.264/MPEG-4 Part 10</i> , 4 th EURASIP Conf., Zagreb, Croatia (July 2-5, 2003)
1026	Jordi Ribas-Corbera, et al., <i>A Generalized Hypothetical Reference Decoder for H.264/AVC</i> , 13 IEEE Trans. on Circuits and Sys. For Video Tech., 674 (July 2003)
1027	Colt McAnlis & Aleks Haecky, <i>Understanding Compression, Chapter 4: Variable-Length Codes</i> , O’Reilly (July 2016), https://www.oreilly.com/library/view/understanding-compression/9781491961520/ch04.html
1028	David A. Huffman, <i>A Method for the Construction of Minimum-Redundancy Codes</i> , Proc. of the I.R.E., 1098 (Sept. 1952)

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1029	Tino von Roden, <i>H.261 and MPEG1 – A Comparison</i> , Conf. Proc. of the 1996 IEEE Fifteenth Annual Int’l Phoenix Conf. on Comp. and Comm’cns, 65 (1996)
1030	<i>JCT-VC – Joint Collaborative Team on Video Coding</i> , Int’l Telecomm. Union, https://www.itu.int/en/ITU-T/studygroups/2013-2016/16/Pages/video/jctvc.aspx
1031	<i>Terms of Reference of the Joint Collaborative Team on Video Coding Standard Development</i> , JCT-VC (Jan. 2010)
1032	A.W. Johnson & J. Princen, <i>Drift Minimization in Frequency Scalable Coders Using Block Based Filtering</i> , IEEE Workshop on Visual Signal Processing and Comm’n, 231 (September 1993)
1033	Shuai Hu et al., <i>Optimization of Memory Allocation for H.264/AVC Video Decoder on Digital Signal Processors</i> , 2008 Congress on Image and Signal Processing
1034	Paige Albiniak, <i>HDTV: Launched and Counting</i> , Highbeam Research (Nov. 2, 1998), http://www.highbeam.com/doc/1G1-53190401.html , WayBack Machine (Sept. 24, 2014)
1035	Siwei Ma, <i>Rate Control for JVT Video Coding Scheme with HRD Considerations</i> , Proceedings 2003 Int’l Conf. on Image Processing (Nov. 24, 2003)
1036	<i>All Meetings</i> , JCT-VC, phenix.int-evry.fr/jct/doc_end_user/all_meeting.php
1037	<i>Special Section on the Joint Call for Proposals on High Efficiency Video Coding (HEVC) Standardization</i> , 20 IEEE Trans. on Circuits and Sys. For Video Tech. 1661 (Dec. 2010)
1038	Gary J. Sullivan & Jens-Rainer Ohm, <i>Meeting report of the first meeting of the Joint Collaborative Team on Video Coding (JCT-VC)</i> , Dresden, DE, 15-23 April, 2010, JCT-VC-A200 (Mar. 19, 2012)

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1039	Gary J. Sullivan & Jens-Rainer Ohm, <i>Meeting report of the second meeting of the Joint Collaborative Team on Video Coding (JCT-VC)</i> , Geneva, CH, 21-28 July, 2010, JCT-VC-B200 (Mar. 19, 2012)
1040	Gary J. Sullivan & Jens-Rainer Ohm, <i>Meeting report of the third meeting of the Joint Collaborative Team on Video Coding (JCT-VC)</i> , Guangzhou, CN, 7–15 October, 2010, JCT-VC-C400 (Jan. 16, 2011)
1041	Gary J. Sullivan & Jens-Rainer Ohm, <i>Meeting report of the fourth meeting of the Joint Collaborative Team on Video Coding (JCT-VC)</i> , Daegu, KR, 20-28 January, 2011, JCT-VC-D500, v.2 (Apr. 15, 2011)
1042	Gary J. Sullivan & Jens-Rainer Ohm, <i>Meeting report of the fifth meeting of the Joint Collaborative Team on Video Coding (JCT-VC)</i> , Geneva, CH, 16-23 March 2011, JCT-VC-E600, v.3 (July 19, 2011)
1043	Gary J. Sullivan & Jens-Rainer Ohm, <i>Meeting report of the sixth meeting of the Joint Collaborative Team on Video Coding (JCT-VC)</i> , Torino, IT, 14–22 July 2011, JCT-VC-F800 (Nov. 18, 2011)
1044	Gary J. Sullivan & Jens-Rainer Ohm, <i>Meeting report of the seventh meeting of the Joint Collaborative Team on Video Coding (JCT-VC)</i> , Geneva, CH, 21–30 Nov. 2011, JCT-VC-G1100 (Jan. 31, 2012)
1045	Document Information, JCTVC-E603, phenix.int-evry.fr/jct/doc_end_user/current_document.php?id=2471
1046	<i>About ITU</i> , https://www.itu.int/en/about/Pages/default.aspx
1047	European Patent Application No. 2,533,537
1048	Japanese Patent Application No. 2013-12887
1049	U.S. Patent Application No. 2012/0257702

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1050	Document Information, JCTVC-F158, phenix.int-evry.fr/jct/doc_end_user/current_document.php?id=2623
1051	<i>ITU-T In Brief</i> , https://www.itu.int/en/ITU-T/about/Pages/default.aspx
1052	<i>About MPEG</i> , https://www.mpeg.org/about-mpeg/
1053	Declaration of Benjamin Bross, <i>Samsung Elecs. Co., Ltd. v. M&K Holdings Inc.</i> , IPR2018-00696, Ex. 1002 (Excerpted)
1054	“Resolution,” Guangzhou Meeting (C) – Document Register, phenix.it-sudparis.eu/jct/doc_end_user/current_meeting.php
1055	“Deblock,” Daegu Meeting (D) – Document Register, phenix.it-sudparis.eu/jct/doc_end_user/current_meeting.php
1056	“Resolution,” Daegu Meeting (D) – Document Register, phenix.it-sudparis.eu/jct/doc_end_user/current_meeting.php
1057	Geneva Meeting (E) – Document Register, phenix.it-sudparis.eu/jct/doc_end_user/current_meeting.php?id_meeting=148&search_category=m&search_id_group=1&search_sub_group=1
1058	“Resolution,” Geneva Meeting (E) – Document Register, phenix.it-sudparis.eu/jct/doc_end_user/current_meeting.php
1059	“Working Draft,” Geneva Meeting (E) – Document Register, phenix.it-sudparis.eu/jct/doc_end_user/current_meeting.php
1060	Torino Meeting (F) – Document Register, phenix.it-sudparis.eu/jct/doc_end_user/current_meeting.php?id_meeting=149&search_id_group=1&search_sub_group=1
1061	“Resolution,” Torino Meeting (F) – Document Register, phenix.it-sudparis.eu/jct/doc_end_user/current_meeting.php
1062	“Resolution,” Geneva Meeting (G) – Document Register, phenix.it-sudparis.eu/jct/doc_end_user/current_meeting.php

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1063	Mehmet Umut Demircin, et al., <i>TE2: Compressed Reference Frame Buffers (CRFB)</i> , Geneva, CH, 21–28 July, 2010, JCT-VC-B089 (Mar. 19, 2012)
1064	Zuhang Jia and Qingjiu Huang, <i>Image Interpolation with Regional Gradient Estimation</i> , Applied Sci. (July 22, 2022)
1065	Canon, <i>EOS Movie Compression Options: All-I and IPB</i> , https://www.canon.com.hk/cpx/en/technical/va_EOS_Movie_Compression_Options_All_I_and_IPB.html
1066	Scott Sargent, <i>AV Workshop’s HD Upres Video Transfer Add On</i> (May 12, 2021), https://av-workshop.com/av-workshop-video-transfer-hd-upres/
1067	<i>Interdigital v. Lenovo</i> , Evidentiary Hearing Transcript (Aug. 14, 2024)
1068	Stipulation Letter, dated February 23, 2026
1069	Complaint, <i>InterDigital, Inc. v. Amazon.com Services LLC</i> , No. 2:25-cv-00822 (E.D. Va. Dec. 18, 2025), ECF No. 1
1070	InterDigital 10-K (Fiscal Year 2022)
1071	Order, <i>InterDigital, Inc. v. Hisense Co.</i> , C.A. No. 1:26-cv-754, ECF No. 38 (N.D. Ga. Apr. 7, 2026)
1072	Order, <i>InterDigital, Inc. v. TCL Indus. Holdings Co.</i> , C.A. No. 2:26-cv-101, ECF No. 10 (E.D. Tex. Apr. 15, 2026)
1073	EDIS Docket Filings, <i>Certain Video-Capable Electronic Devices, Including Smart Televisions, Monitors, and Components Thereof</i> , Inv. No. 337-TA-1495 (Feb. 26, 2026)
1074	Arbitration Agreement

Petitioners Amazon.com, Inc. and Amazon.com Services LLC (“Amazon” or “Petitioners”) and Patent Owner InterDigital Madison Patent Holdings, SAS., (“InterDigital” or “Patent Owner”) have executed an arbitration agreement whereby, among other things, the parties have agreed to withdraw this proceeding. Under 35 U.S.C. § 317(a) and 37 C.F.R. § 42.74, Amazon and InterDigital therefore jointly move to terminate the present *inter partes* review proceeding in its entirety and request that the arbitration agreement be treated as business confidential information pursuant to 35 U.S.C. § 317(b) and 37 C.F.R. § 42.74(c). The Board authorized the parties to file this Joint Motion on July 10, 2026, via email.

I. STATEMENT OF FACTS

A joint motion to terminate generally “must (1) include a brief explanation as to why termination is appropriate; (2) identify all parties in any related litigation involving the patents at issue; (3) identify any related proceedings currently before the Office; and (4) discuss specifically the current status of each such related litigation or proceeding with respect to each party to the litigation or proceeding.” *Heartland Tanning, Inc. v. Sunless, Inc.*, IPR2014-00018, Paper 26, at *2 (July 28, 2014).

Amazon and InterDigital (collectively, the “Arbitrating Parties”) have reached an agreement (the “Arbitration Agreement”) to resolve their disputes involving the ’877 patent in another forum—before an Arbitral Tribunal (as defined in the

agreement). There are no other proceedings or litigations between Amazon and InterDigital involving the '877 patent.

There are additional pending proceedings involving the '877 patent and third parties that are not involved in this IPR: *Certain Video-Capable Electronic Devices, Including Smart Televisions, Monitors, and Components Thereof*, Inv. No. 337-TA-3889 (ITC, Feb. 25, 2026); *InterDigital, Inc. v. TCL Industries Holdings Co., Limited*, EDTX-2-26-cv00101 (Feb. 9, 2026); *InterDigital, Inc. v. Hisense Co., Ltd.*, NDGA-1-26-cv-00754 (Feb. 9, 2026). TTE Technology, Inc. d/b/a TCL North America also recently filed an IPR challenging the '877 patent in IPR2026-00417 and a motion to join this proceeding. These additional proceedings are in their early stages and do not involve the Amazon Petitioners. Because the current IPR is in its early stages and post-institution briefing has not been submitted, this IPR should be terminated. The disputes between Patent Owner and unrelated third parties should be resolved in those respective proceedings.

Under 37 C.F.R. § 42.74(b), the Arbitration Agreement is in writing. A true and correct copy is being filed as Exhibit 1074.

II. RELIEF REQUESTED

The Arbitrating Parties request termination of this inter partes review in its entirety and respectfully submit that such termination is justified, and the Board

should terminate this proceeding in its entirety, as the Arbitrating Parties jointly request, for the following reasons:

First, Amazon and InterDigital 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). In fact, briefing is not yet complete in this IPR, and there has not yet been an oral argument. Under section 317(a), “[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.” There are no other preconditions recited in 35 U.S.C. § 317(a). Further, “[i]f no petitioner remains in the inter partes review, the Office may terminate the review.” 35 U.S.C. § 317(a) Upon termination of Petitioners Amazon.com, Inc. and Amazon.com Services LLC, no petitioner remains and termination of the proceeding in its entirety is appropriate.

Second, Amazon and InterDigital have reached an agreement regarding the disputes in this proceeding and as to the ’877 patent. A true copy of the Arbitration Agreement is being filed concurrently herewith. *See* Exhibit 1074.

Third, termination would save significant further expenditure of resources by the Arbitrating Parties. Termination upon agreement, as requested, would also further the purpose of *inter partes* review proceedings, which seek to provide an

efficient and less costly alternative forum for patent disputes. Further, maintaining the proceeding would discourage future agreements as patent owners in similar situations would have a strong disincentive to reach an agreement with a petitioner if the patent owner perceives that an *inter partes* review would continue regardless of the agreement.

III. CONCLUSION

For the foregoing reasons, Amazon and InterDigital respectfully request termination of this *inter partes* review in its entirety.

Respectfully submitted,

Dated: July 14, 2026

/ Jessica Kaiser /

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Inc. and Amazon.com Services LLC

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CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6(e), I certify that on July 14, 2026 a copy of **JOINT MOTION TO TERMINATE PROCEEDINGS PURSUANT TO 35 U.S.C. § 317 and EXHIBIT 1074** was served upon the below-listed counsel by electronic mail:

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