

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

IPG PHOTONICS CORPORATION
Petitioner

v.

TRUMPF LASER UND SYSTEMTECHNIK GMBH
Patent Owner

Case No. IPR2026-00251
U.S. Patent No. 12,240,054

**JOINT MOTION TO TERMINATE THE PROCEEDING;
AND
JOINT REQUEST TO TREAT THE SETTLEMENT AND LICENSE
AGREEMENT AS BUSINESS CONFIDENTIAL**

PETITIONER’S UPDATED TABLE OF EXHIBITS

Exhibit No.	DESCRIPTION
1001	U.S. Patent No. 12,240,054 (“The ’054 Patent”)
1002	Declaration of Dr. Liang Dong
1003	File History of U.S. Patent No. 12,240,054
1004	E.P. Patent No. 1,284,672 (“Neuberger”)
1005	U.S. Patent No. 6,160,943 (“Davis”)
1006	WO2006/021609 (“Kalle”)
1007	U.S. Patent No. 4,000,416 (“Goell”)
1008	U.S. Patent No. 5,897,551 (“Everett”)
1009	510(k) Summary FDA Approval of StrateFire™ Reusable Optical Fiber
1010	U.S. Patent Application Publication 2008/0086118 (“Lai”)
1011	Optical Communications Essentials by Gerd Keiser (“Keiser”)
1012	U.S. Patent No. 4,465,335 (“Eppes”)
1013	Certified Translation of E.P. Patent No. 0,362,466 (“Hessel”)
1014	Trumpf & IPG Photonics’ Settlement and License Agreement (the “Agreement”) (CONFIDENTIAL)

Pursuant to 35 U.S.C. § 317 (a) and 37 C.F.R. §§ 42.72 and 42.74, and the Board's authorization on May 5, 2026 (EX3101), Petitioner, IPG Photonics Corporation ("IPG Photonics"), and Patent Owner, Trumpf Laser Und Systemtechnik Gmbh ("Trumpf"), (collectively, "the Parties") jointly move to terminate the present *inter partes* review proceeding in light of the settlement of their dispute regarding U.S. Patent No. 12,240,054 (the "'054 Patent"), and jointly request to treat the copy of the settlement agreement filed along with this paper (Confidential Exhibit 1014) as business confidential information.

I. INTRODUCTION

The Petition in this proceeding was filed on February 18, 2026, by IPG Photonics. On April 27, 2026, Patent Owner filed its request for discretionary denial. Paper 6. Petitioner's opposition to discretionary denial and the Patent Owner's Preliminary Response ("POPR") are due May 25, 2026. The Board has not yet issued a decision on institution.

On April 24, 2026, the Parties entered into a Settlement and License Agreement (the "Agreement") that resolves the current dispute regarding the '054 Patent. *See* Confidential Exhibit 1014. The Parties contacted the Board by email to request authorization to file a joint motion to terminate this IPR Proceeding and a joint request to file the Agreement as business confidential information. The Board granted the authorization in a responsive email on May 5, 2026. EX3001.

II. JOINT MOTION TO TERMINATE THE PROCEEDING

The Parties jointly request that this *inter partes* review be terminated in light of the settlement of their dispute regarding the '054 Patent.

“An 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.” 35 U.S.C. § 317(a). Moreover:

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. 35 U.S.C. §§ 317(a), 327.

Consolidated Trial Practice Guide (November 2019) (“TPG”), page 86, §II.N.

Termination of the present *inter partes* review is appropriate because the Parties have settled their dispute regarding the '054 Patent and the Office has not yet decided the merits of this proceeding.

Additionally, a true and complete copy of the Agreement is being filed along with this paper. *See* Confidential Exhibit 1014. The Parties certify that there are no other agreements or understandings between the Parties, including any collateral agreements, made in connection with, or in contemplation of, the termination of this proceeding.

Therefore, the Parties respectfully request termination of this *inter partes* review.

III. JOINT REQUEST TO TREAT SETTLEMENT AGREEMENT AS BUSINESS CONFIDENTIAL INFORMATION

The Parties jointly request that the Agreement filed as Confidential Exhibit 1014 be treated as business confidential information and be kept separate from the publicly available files of the '054 Patent.

Section 317(b) provides that:

At the request of the party to the proceeding, the agreement or understanding shall be treated as business confidential information, shall be kept separate from the file of the involved patents, and shall be made available only to Federal Government agencies on written request, or to any person on a showing of good cause.

Likewise, 37 C.F.R. § 42.74(c) provides that:

A party to a settlement may request that the settlement be treated as business confidential information and be kept separate from the files of any involved patent or application. The request must be filed with the settlement. If a timely request is filed, the settlement shall only be available:

- (1) To a Government agency on written request to the Board; or
- (2) To any other person upon written request to the Board to make the settlement agreement available, along with the fee specified in § 42.15(d) and on a showing of good cause.

The present request, which is being filed along with the Agreement, is timely and in accordance with the foregoing authority.

Therefore, the Parties respectfully request that the Board grant this request for confidential treatment.

Dated: May 07, 2026

Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned certifies that on May 7, 2026 a complete copy of the foregoing and corresponding exhibit were served on counsel of record for the Patent Owner by filing the documents through P-TACTS and by sending via electronic mail to the following addresses:

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