

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

INTELLIGENT WELLHEAD SYSTEMS, INC.,
Petitioner,

v.

DOWNING WELLHEAD EQUIPMENT, LLC,
Patent Owner.

PGR2025-00002
U.S. Patent No. 12,134,952

**PATENT OWNER'S UNOPPOSED MOTION TO TERMINATE AND
REQUEST FOR ADVERSE JUDGMENT UNDER 37 CFR § 42.73(b)(1)**

Pursuant to 37 C.F.R. §§ 42.72 and 42.73, and the Board's authorization on September 2, 2025, Patent Owner moves to terminate the present post-grant review proceeding in light of the disclaimer filed by Patent Owner disclaiming all claims of U.S. Patent 12,134,952.

"A party may request judgment against itself at any time during a proceeding." 37 C.F.R. § 42.73(b). Actions construed to be a request for adverse judgment include "[d]isclaimer of the involved application or patent." 37 C.F.R. § 42.73(b)(1). On August 28, 2025, Patent Owner filed a statutory disclaimer under 37 C.F.R. § 1.321(a) disclaiming all claims 1–78 of U.S. Patent 12,134,952.

Ex.2016. In view of this statutory disclaimer, no challenged claims remain in this proceeding. Accordingly, Patent Owner respectfully requests entry of adverse judgment under § 42.73(b)(1) and moves to terminate the instant proceeding.

Petitioner does not oppose this motion.

Respectfully submitted,

Dated: September 10, 2025
HAYNES AND BOONE, LLP
2801 N. Harwood Ave, Ste 2300
Dallas, Texas 75201
Customer No. 27683

/Scott T. Jarratt/
Scott T. Jarratt
Lead Counsel for Patent Owner
Registration No. 70,297

PATENT OWNER'S UPDATED EXHIBIT LIST

September 10, 2025

Exhibit	Description
Ex.2001	Email from Trials dated 01-10-25
Ex.2002	Downing Continuous Pumping WordPress Page
Ex.2003	Tim Marvel Email RE Continuous Pumping Webpage with Attachment
Ex.2004	Marvel LinkedIn Post 1/12/2020
Ex.2005	Declaration of Tim Marvel
Ex.2006	Declaration of Harold E. McGowen III, P.E.
Ex.2007	CV of Harold E. McGowen III, P.E.
Ex.2008	Appendix A, as-filed with U.S. Provisional Application 63/189,663, downloaded from https://patentcenter.uspto.gov/applications/63189663/supplementalContent?application=
Ex.2009	Petition for <i>Inter Partes</i> Review, IPR2024-00256
Ex.2010	Petition for <i>Inter Partes</i> Review, IPR2024-00583
Ex.2011	Preliminary Response, IPR2024-00256
Ex.2012	Preliminary Response, IPR2024-00583
Ex.2013	Institution Decision, IPR2024-00256
Ex.2014	Institution Decision, IPR2024-00583
Ex.2015	Wayback Machine - Downing Continuous Pumping Web Page, archived Oct. 20, 2020, https://web.archive.org/web/20201020115107/https://downingusa.c

Patent Owner's Unopposed Motion to Terminate
and Request for Adverse Judgment
PGR2025-00002 / U.S. 12,134,952

	om/freedomseries/continuouspumping/
Ex.2016 (NEW)	Statutory Disclaimer as Filed on August 28, 2025

CERTIFICATE OF SERVICE

This will certify that pursuant to 37 C.F.R. § 42.6(e), a true and correct copy of the foregoing was served on Petitioner as detailed below:

Date of Service September 10, 2025

Manner of Service Electronic Service: tammy.terry@nelsonmullins.com;
lisa.margonis@nelsonmullins.com

Document served **Patent Owner's Motion to Terminate and Request for Adverse Judgment; Exhibit List and Exhibit Ex.2016**

Persons served Tammy J. Terry
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/ Scott T. Jarratt /
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