DOCKET NO.: 0107131-00269US1
Filed on behalf of Intel Corporation
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UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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INTEL CORPORATION
Petitioner

v.

Zond, LLC, Patent Owner of
U.S. Patent No. 6,805,779 to Roman Chistyakov

IPR Trial No. 2014-00598

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JOINT MOTION TO TERMINATE PROCEEDING
PURSUANT TO 35 U.S.C. § 317 AND 37 C.F.R. § 42.72

Pursuant to 35 U.S.C. §317 and 37 C.F.R. § 42.72, Patent Owner Zond LLC

("Patent Owner") and Petitioner Intel Corporation ("Petitioner") (collectively, "the

Parties") jointly request termination of *Inter Partes* Review No. IPR2014-00598,

involving claims 1-4, 10-15, 17, 18, 24-27 and 29 of U.S. Patent 6,805,779.

The Parties have settled all of their disputes involving the following patents

U.S. Patents Nos. 6,805,779 B2 (the "'779 patent"), 6,806,652 B1 (the "'652

patent"), 6,853,142 B2 (the "'142 patent"), 7,147,759 (the "'759 patent"),

7,604,716 B2 (the "'716 patent"), 7,808,184 B2 (the "'184 patent"), and 7,811,421

B2 (the "'421 patent"). More specifically, the Parties have agreed to settle and

dismiss their related district court litigation (1:13-cv-11570-RGS (*Zond v. Intel*

Corp.)). The Parties have also agreed to jointly request termination of this

proceeding and all IPRs filed by Intel for the above listed patents[1].

Zond patent	Intel IPRs relating to patent
'759 patent	IPR2014-00443
	IPR2014-00444
	IPR2014-00445
	IPR2014-00446
	IPR2014-00447
'184 patent	IPR2014-00455
	IPR2014-00456
'421 patent	IPR2014-00468
	IPR2014-00470
	IPR2014-00473

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[1] The Parties are submitting a Joint Motion to Terminate Proceeding in each of the

IPRs filed by Intel in the above identified patents.

'142 patent	IPR2014-00494 IPR2014-00495 IPR2014-00496 IPR2014-00497 IPR2014-00498
'716 patent	IPR2014-00520 IPR2014-00521 IPR2014-00522 IPR2014-00523
'779 patent	IPR2014-00598 IPR 2014-00686 IPR 2014-00765 IPR 2014-00820 IPR 2014-00913
'652 patent	IPR2014-00843 IPR2014-00923 IPR 2014-00945

Pursuant to 37 C.F.R. § 42.74(b), the Parties' settlement agreement and any collateral agreements made in contemplation of termination of the proceeding are in writing, and true and correct copies of such documents are being filed herewith as Exhibit 1013.

The Parties hereby jointly request that the settlement related agreements be treated as business confidential information and be kept separate from the files of the above captioned IPR pursuant to 35 U.S.C. § 317(b) and 37 C.F.R. § 42.74(c).

I.   Background

Petitioner filed several requests for *Inter Partes* Review of the above identified patents. The Board has instituted *Inter Partes* Review on all challenged claims of the '759, '421, and '184 patents, and has not issued a decision on

institution regarding the remaining patents. Specifically, a trial was instituted in

the following IPRs:

Zond patent	Intel IPRs relating to patent
'759 patent	IPR2014-00443 IPR2014-00444 IPR2014-00445 IPR2014-00446 IPR2014-00447
'184 patent	IPR2014-00455 IPR2014-00456
'421 patent	IPR2014-00468 IPR2014-00470 IPR2014-00473

Decision on institution has not yet been ordered for the following IPRs:

Zond patent	Intel IPRs relating to patent
'142 patent	IPR2014-00494 IPR2014-00495 IPR2014-00496 IPR2014-00497 IPR2014-00498
'716 patent	IPR2014-00520 IPR2014-00521 IPR2014-00522 IPR2014-00523
'779 patent	IPR2014-00598 IPR 2014-00686 IPR 2014-00765 IPR 2014-00820 IPR 2014-00913
'652 patent	IPR2014-00843 IPR2014-00923 IPR 2014-00945

On September 4, 2014, the Parties agreed to settle all of their disputes involving U.S. Patent Nos. 6,805,779 B2, 6,806,652 B1, 6,853,142 B2, 7,147,759 B2, 7,604,716 B2, 7,808,184 B2, and 7,811,421 B2, including all litigation and Patent Office proceedings related thereto.

On September 4, 2014, the Parties informed the Board of the settlement and requested a phone conference with the Board requesting authorization to file a joint motion to terminate the proceeding with respect to both the Patent Owner and the Petitioner. In a conference call with the Board on September 8, 2014, the Parties confirmed that settlement had been reached.

As more fully set forth in the Order for Conduct of the Proceedings, September 9, 2014 (Paper 16 of IPR2014-00443) ("Order"), the Board authorized the filing of the requested joint motion to terminate this proceeding as to both parties.

II.   Termination as to Patent Owner and Petitioner Is Appropriate

A.   The following is a brief explanation as to why termination as to the Parties is appropriate which is presented by both parties.

Termination of this IPR is appropriate as the Board has not yet "decided the merits of the proceeding" on several of the proceedings noted above. *See, e.g.,* Office Patent Trial Practice Guide, 77 Fed. Reg. 48756, 48768 (Aug. 14, 2012).

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