

Paper No. \_\_\_\_\_  
Filed: October 28, 2015

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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FORD MOTOR COMPANY,

Petitioner

v.

INNOVATIVE DISPLAY TECHNOLOGIES, LLC

Patent Owner

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Case No. IPR2015-01540

Patent No. 6,886,956

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**JOINT MOTION TO TERMINATE *INTER PARTES* REVIEW**

Pursuant to 35 U.S.C. § 317(a) and 37 C.F.R. §§ 42.72 and 42.74, Petitioner Ford Motor Company (“Ford”) and Patent Owner Innovative Display Technologies, LLC (“Patent Owner”) jointly request termination of *Inter Partes* Review Case No. IPR2015-01540. The Board authorized the parties to file this joint request via e-mail correspondence on October 27, 2015.

Patent Owner and Ford respectfully submit that termination is appropriate because they have reached an agreement resolving the dispute involving the patent at issue in the above-captioned *Inter Partes* Review, prior to any institution decision in the above-captioned *Inter Partes* Review. Further, Ford represents that it will no longer participate even if the Board does not terminate the above-captioned *Inter Partes* Review. This means that Ford will file no further papers, will not be conducting any further cross examination of any Patent Owner witnesses, and will not be participating in any oral argument.

As required under 35 U.S.C. § 317(b) and 37 C.F.R. § 42.72(b), filed herewith is a true copy of the written settlement agreement (“Agreement”) resolving the dispute in the above-captioned *Inter Partes* Review and the related litigation. *See* Confidential Exhibit 1015. The parties do not foresee any further litigation among them relating to the Subject Patent. The parties further certify that there are no collateral agreements or understandings made in connection with

the termination of the present *Inter Partes* review proceeding.

Ford and Patent Owner are concurrently filing a Joint Request that the Agreement, Confidential Exhibit 1015, be treated as business confidential information, kept separate from the file of the involved patents, and made available only to Federal Government agencies on written request, or to any person on a showing of good cause pursuant to 35 U.S.C. § 317(b) and 37 C.F.R. §42.74(c).

Dated: October 28, 2015

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

The undersigned certifies that a copy of the foregoing **JOINT REQUEST TO TERMINATE INTER PARTES REVIEW** was served on October 28, 2015, via electronic mail directed to counsel of record for the Patent Owner at the following:

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*/s/ Jason R. Mudd* \_\_\_\_\_

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