

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

VOLKSWAGEN GROUP OF AMERICA, INC.,
SUBARU OF AMERICA, INC.,
and VOLVO CAR USA, LLC,
Petitioners

v.

STRATOSAUDIO, INC.,
Patent Owner

Case IPR2021-00721
Patent No. 8,166,081

**JOINT MOTION TO TERMINATE PROCEEDING WITH RESPECT TO
VOLVO CAR USA, LLC
PURSUANT TO 35 U.S.C. § 317**

Pursuant to 35 U.S.C. § 317(a), Volvo Car USA, LLC (“Volvo”) and StratosAudio, Inc. (“Patent Owner”) (collectively the “Parties”) jointly request termination of Volvo’s involvement in IPR2021-00721, which is directed to U.S. Patent No. 8,166,081 (the “’081 Patent”). Volvo and Patent Owner note that the grant of this motion will not result in the termination of this *inter partes* review because Petitioners Volkswagen Group of America, Inc. and Subaru of America, Inc. are not requesting termination of this *inter partes* review. The Parties were authorized to file this Joint Motion by the Board (via email) on September 22, 2022.

A settlement agreement between Volvo and Patent Owner has been made in writing, and a true copy of the same is attached as Exhibit 2025. There are no other collateral agreements between the Parties made in connection with, or in contemplation of, the termination sought. The Parties desire that the settlement agreement be maintained as business confidential information (including with respect to other entities constituting Petitioner) under 37 C.F.R. § 42.74(c) and a separate joint request to that effect is being filed herewith.

The ’081 Patent is asserted in the following pending litigations:

Caption	Case No.	Defendant	Status
<i>StratosAudio, Inc. v. Subaru of America, Inc.</i>	6:20-cv-1128 (WDTX)	Subaru of America, Inc.	Pending
<i>StratosAudio, Inc. v. Volkswagen Group of America, Inc.</i>	2:22-cv-10524 (EDMI)	Volkswagen Group of America, Inc.	Stayed pending <i>inter partes</i> review

<i>StratosAudio, Inc. v. Hyundai Motor America</i>	2:22-cv-01712 (CDCA)	Hyundai Motor America	Stayed pending <i>inter partes</i> review
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In accordance with 35 U.S.C. § 317(a), because Patent Owner and Volvo jointly request this termination as to Volvo's involvement in this *inter partes* review, no estoppel under 35 U.S.C. § 315(e) shall attach to Volvo.

Volvo will not further participate in these proceedings.

Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the foregoing

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was served on September 27, 2022, by delivering a copy by email to the attorneys
of record for the Petitioner Volvo Car USA, LLC at the following email addresses:

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