

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

ARGOS USA LLC, DOLE FOOD COMPANY, INC., THE GILLETTE
COMPANY, LLC, MILACRON LLC, PLY GEM INDUSTRIES, INC.,
REVLON CONSUMER PRODUCTS CORPORATION, CALPINE
CORPORATION, WATTS WATER TECHNOLOGIES, INC., LIBERTY
MUTUAL INSURANCE COMPANY, INTERNATIONAL PAPER
COMPANY, STATE INDUSTRIAL PRODUCTS CORP., BASSETT
FURNITURE INDUSTRIES, INC.,
Petitioners,

v.

GUADA TECHNOLOGIES LLC,
Patent Owner,

Case IPR2021-00771
Patent 7,231,379

JOINT MOTION TO DISMISS PETITION

UNDER 35 U.S.C. § 317

EXHIBITS

<u>Exhibit</u>	<u>Description</u>
Ex. 1001	U.S. Patent 7,231,379 to Parikh <i>et al.</i> ('379 Patent)
Ex. 1002	File History of U.S. Patent 7,231,379 to Parikh <i>et al.</i> ('379 File History)
Ex. 1003	Guada's Combined Opposition to Defendants' Motion to Dismiss, <i>Guada Techs LLC. v. Netflix, Inc.</i> (Dkt. No. 20, No. 2:16-cv-1153-RWS-RSP)
Ex. 1004	U.S. Pat. No. 6,731,724 to Wesemann <i>et al.</i> ("Wesemann")
Ex. 1005	U.S. Pat. No. 6,366,910 to Rajaraman <i>et al.</i> ("Rajaraman")
Ex. 1006	U.S. Pat. No. 7,539,656 to Fratkina <i>et al.</i> ("Fratkina")
Ex. 1007	Declaration of Dr. Padhraic Smyth ("Smyth")
Ex. 1008	RESERVED
Ex. 1009	Dr. Padhraic Smyth <i>Curriculum Vitae</i>
Ex. 1010	JOHN E. HOPCROFT, JEFFREY D. ULLMAN & ALFRED V. AHO, DATA STRUCTURE AND ALGORITHMS 75–106, 155–197, 306–346 (Addison-Wesley 1983)
Ex. 1011	Donald, B. Crouch, Carolyn J. Crouch & Glenn Andreas, <i>The Use Of Cluster Hierarchies in Hypertext Info. Retrieval</i> , HYPERTEXT '89 PROC., ACM PRESS, at 225-237, 1989
Ex. 1012	Yvan Leclerc, Steven W. Zucker, Denis Leclerc, <i>A Browsing Approach to Documentation</i> , IEEE COMPUTER, IEEE PRESS, June 1982, at 46–49
Ex. 1013	Ricky E. Savage, James K. Habinek, Thomas W. Barnhart, <i>The Design, Simulation, and Evaluation of a Menu Driven User Interface</i> , PROC. OF THE 1982 CONF. ON HUMAN FACTORS IN COMPUTING SYS., ACM PRESS, March 1982, at 36–40
Ex. 1014	RICARDO BAEZA-YATES, BERTHIER RIBIERO-NETO, MODERN INFO. RETRIEVAL 24-41 (ACM Press 1999)

Ex. 1015	Daniel Cunliffe, Carl Taylor, and Douglas Tudhope, <i>Query-Based Navigation in Semantically Indexed Hypermedia</i> , PROC. OF THE EIGHTH ACM CONF. ON HYPERTEXT, ACM PRESS, 1997, at 87–95
Ex. 1016	Hornstein, <i>Telephone Voice Interfaces on the Cheap</i> , PROCEEDINGS OF THE UBLAB '94 CONF., 1994, at 134–147.
Ex. 1017	Paul De Bra, et al., <i>Info. Retrieval in Distrib. Hypertexts</i> , RIAO 1994, at 481–491, 1995
Ex. 1018	U.S. Pat. No. 6,198,939 to Holmstrom
Ex. 1019	Karen Sparck Jones, <i>A Look Back And A Look Forward</i> , PROCEEDINGS OF THE 11TH ACM SIGIR INT'L CONF. ON RSCH. AND DEV. IN INFO. RETRIEVAL ACM Press, 1988, 14 pages
Ex. 1020	Gerard Salton, Anita Wong, and Chung-Shu Yang, <i>A Vector Space Model For Automatic Indexing</i> , COMMC'NS OF THE ACM, 1975 18(11), at 613–620
Ex. 1021	Jinxi Xu and W. Bruce Croft, <i>Query Expansion Using Local And Global Document Analysis</i> , PROCEEDINGS OF THE 19TH ACM SIGIR INT'L CONF. ON RSCH AND DEV. IN INFO. RETRIEVAL ACM, 1996, at 4–11
Ex. 1022	Carolyn J. Crouch, <i>A Cluster-Based Approach to Thesaurus Construction</i> , PROC. OF THE 11TH ACM SIGIR INT'LCONF. ON RSCH AND DEV. IN INFO. RETRIEVAL, ACM, 1988, at 309–320
Ex. 1023	Hinrich Schütze and Jan O. Pedersen, <i>A Cooccurrence-Based Thesaurus And Two Applications to Information Retrieval</i> , 1 INTELLIGENT MULTIMEDIA INFO. RETRIEVAL SYS. AND MGMT., , 1994 at 266–274
Ex. 1024	Güntzer et al., <i>Automatic Thesaurus Construction by Machine Learning from Retrieval Sessions</i> , 25 INFO. PROC. & MGMT. No. 3, 1998, at 265–273, 1998
Ex. 1025	Mostafa et al., <i>A Multilevel Approach to Intelligent Information Filtering: Model, Sys., and Evaluation</i> , 15 ACM TRANSACTIONS ON INFO. SYS. NO. 4, 1997, at 368–399, 1997
Ex. 1026	U.S. Patent No. 6,006,225 to Bowman <i>et al.</i>

Ex. 1027	Gerald Salton, <i>The Evaluation Of Automatic Retrieval Procs.—Selected Test Results Using the SMART Sys.</i> , AMERICAN DOCUMENTATION, 16(3), 1965, at 209–222
Ex. 1028	Larry Fitzpatrick, Mei Dent, <i>Automatic Feedback Using Past Queries: Social Searching?</i> , 31 ACM SIGIR FORUM 1997, at 306-313
Ex. 1029	U.S. Pat. No. 6,453,315 to Weissman (“Weissman”)
Ex. 1030	CONFIDENTIAL Settlement Agreements

Pursuant to 35 U.S.C. § 317(a), Petitioners Argos USA LLC, Dole Food Company, Inc., The Gillette Company, LLC, Milacron LLC, Ply Gem Industries, Inc., Revlon Consumer Products Corporation, Calpine Corporation, Watts Water Technologies, Inc., Liberty Mutual Insurance Company, International Paper Company, State Industrial Products Corp. and Bassett Furniture Industries, Inc., and Patent Owner Guada Technologies LLC (collectively “Parties”), hereby jointly move to dismiss the petition in the above-captioned proceeding, subject to the terms of the Settlement Agreements dated August 4, August 5, August 6, August 9, August 10, and August 16, 2021, entered into by the Parties.

The Board authorized the filing of the instant motion in an email dated August 23, 2021. This motion is being filed prior to a decision on the merits of the petition, and is accompanied by a copy of the settlement agreements between the Parties.

The petition was filed April 7, 2021, directed to U.S. Patent No. 7,231,379 (the “379 patent”), and has not yet been instituted.

A. Settlement Agreements

The Parties have settled their dispute, and Pursuant to 35 U.S.C. § 317(b) and 37 C.F.R. § 42.74(b), the Parties’ settlement agreements are in writing, and true and correct copies are being filed concurrently herewith as Exhibit 1030. The Parties are also filing concurrently herewith a request under 35 U.S.C. § 317(b)

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