

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

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FANTASIA TRADING LLC d/b/a ANKERDIRECT,  
Petitioner

v.

SCRAMOGE TECHNOLOGY LTD.,  
Patent Owner

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Case IPR2022-00499  
Patent No. 7,825,537

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**JOINT MOTION TO TERMINATE PROCEEDING**

## EXHIBITS

- EX1001 U.S. Patent 7,825,537 to Freer (“the ’537 patent”)
- EX1002 Prosecution History of the ’537 patent (Serial No. 12/271,023)
- EX1003 Declaration of Thomas Szepesi, Ph.D.
- EX1004 U.S. Pub. 2009/0174263 (“Baarman”)
- EX1005 U.S. Pub. 2007/0279002 (“Partovi-002”)
- EX1006 U.S. Pub. 2009/0096413 (“Partovi-413”)
- EX1007 U.S. Patent 7,211,986 (“Flowerdew”)
- EX1008 U.S. Patent 6,825,620 (“Kuennen”)
- EX1009 U.S. Prov. App. Serial No. 61/019,411 (“411 Provisional”)
- EX1010 U.S. Pub. 2004/0218406 (“Jang”)
- EX1011 Complaint for Patent Infringement, *Scramoge Technology Ltd. v. Anker Innovations Ltd.*, Case No. 5:21-cv-01712 (C.D. Cal.) (October 8, 2021)
- EX1012 U.S. Pub. 2008/0079392 (“Baarman-392”)
- EX1013 U.S. Patent 5,600,225 (“Goto”)
- EX1014 Kim et al., *A Contactless Power Supply for Photovoltaic Power Generation System*, 2008 IEEE Applied Power Electronics Conference (pp. 1910-13 in the APEC 2008 Proceedings)
- EX1015 Severns et al., MODERN DC-TO-DC SWITCH MODE POWER CONVERTER CIRCUITS, Van Nostrand Reinhold Co. (1985) (selected excerpts)

- EX1016 Baker et al., CMOS CIRCUIT DESIGN, LAYOUT, AND SIMULATION, IEEE Press (1998) (selected excerpts)
- EX1017 Erickson, FUNDAMENTALS OF POWER ELECTRONICS, Chapman & Hall, International Thomson Publishing (1997) (selected excerpts)
- EX1018 Horowitz et al., THE ART OF ELECTRONICS, 2<sup>nd</sup> Ed., Cambridge University Press (1989) (selected excerpts)
- EX1019 Daniel M. Mitchell, DC-DC SWITCHING REGULATOR ANALYSIS, McGraw-Hill (1986) (selected excerpts)
- EX1020 Settlement Agreement

Petitioner and Patent Owner (collectively “Parties”) hereby jointly move for an order terminating the preliminary proceeding initiated by the petition for *inter partes* review filed on February 1, 2022, directed to Patent No. 7,825,537 (“the challenged patent”) and assigned case number IPR2022-00499. The Parties have reached a settlement, and the Board has yet to issue a decision to institute trial.

### **I. Statement of Precise Relief Requested**

The parties jointly request that the Board terminate the *inter partes* review of U.S. Patent 7,825,537, Case IPR2022-00499 in its entirety.

### **II. Reasons Why Termination Is Appropriate**

The Board authorized the Parties on August 30, 2022 to file this Joint Motion To Terminate. Termination is proper because the Parties are jointly requesting termination, this IPR proceeding is still in its early stages, and the Board has not yet “decided the merits of the proceeding.” *Samsung Electronics Co., Ltd. et al v. Neodron Ltd.*, IPR2020-01682, Paper 14, 3 (February 18, 2021); *see also Samsung Electronics Co., Ltd. v. Fundamental Innovation Systems Int’l*, IPR2018-00605, Paper 10, 2 (PTAB July 16, 2018). Accordingly, termination is appropriate here.

The parties are filing herewith as Exhibit 1020, a true copy of settlement agreement entered between the Parties, and a request is being filed herewith to treat this agreement as “business confidential information.” *See* 37 C.F.R. § 42.74(c).

The settlement agreement was entered into in contemplation of terminating this

proceeding, and Petitioner and Patent Owner certify there are no collateral agreements or understandings made in connection with, or in contemplation of, the termination of the proceeding. *See* 37 C.F.R. § 42.74(b). The Parties have moved to dismiss the district court litigation and do not contemplate any litigation involving the challenged patent in the foreseeable future.

Petitioner will not participate further in this proceeding. The Parties understand that if the Board terminates this IPR proceeding before a final written decision on patentability, no estoppel under 35 U.S.C. § 315(e) or 37 C.F.R. § 42.73(d)(1) will attach to Petitioner, and no preclusion will attach to Patent Owner under 37 C.F.R. § 42.73(d)(3).

### **III. Conclusion**

The parties have settled all disputes relating to the challenged patent. This IPR proceeding is in an early stage, and the Board has not entered a final written decision on the merits in this proceeding. Accordingly, the parties respectfully request the Board to terminate this proceeding in its entirety.

Date: September 2, 2022

Respectfully submitted,

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