

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SONY GROUP CORPORATION (JAPAN), SONY CORPORATION OF
AMERICA, SONY INTERACTIVE ENTERTAINMENT LLC,
SONY PICTURES ENTERTAINMENT INC.,
SONY ELECTRONICS INC., and
VERANCE CORPORATION,

v.

MZ AUDIO SCIENCE, LLC,
Patent Owner.

Case No. IPR2022-01544
Patent No. 7,289,961

**JOINT MOTION TO TERMINATE SONY PETITIONERS
PURSUANT TO 35 U.S.C. § 317**

LISTING OF EXHIBITS

Exhibit	Description
1001	U.S. Patent No. 7,289,961 (“961 Patent”)
1002	Prosecution History of U.S. Patent No. 7,289,961
1003	Declaration of Michael Scordilis, Ph.D.
1004	Curriculum Vitae of Michael Scordilis, Ph.D.
1005	U.S. Patent No. 6,272,176 (“Srinivasan”)
1006	Richard C. Cabot et al., “Detection of phase shifts in harmonically related tones,” in <i>Journal of the Audio Engineering Society</i> , vol. 24, no. 7, pp. 568-571 (Sept. 1976) (“Cabot”) (from pages 8-11 of the Rachel J. Watters Declaration, Ex. 1009)
1007	PCT Publication WO 01/58063 (“Kudumakis”)
1008	John F. Tilki et al., “Encoding a hidden auxiliary channel onto a digital audio signal using psychoacoustic masking,” in <i>Proceedings IEEE SOUTHEASTCON ’97. ‘Engineering the New Century,’</i> pp. 331-333 (1997) (“Tilki”)
1009	Declaration of Rachel J. Watters Relating to Exhibit 1006
1010	U.S. Patent No. 4,546,779
1011	Christine I. Podilchuk et al., “Digital Watermarking: Algorithms and Applications,” in <i>IEEE Signal Processing Magazine</i> , vol. 18, no. 4, pp. 33-46 (July 2001) (“Podilchuk”) (from pages 6-21 of the Rachel J. Watters Declaration, Ex. 1034)
1012	Ingemar J. Cox et al., “Review of Watermarking and the Importance of Perceptual Modeling,” in <i>Proceedings of SPIE</i> , vol. 3016, pp. 92-99 (June 1997) (“Cox-1997”)
1013	Mitchell D. Swanson et al., “Robust Audio Watermarking Using Perceptual Masking,” in <i>Signal Processing</i> , vol. 66, no. 3, pp. 337-355 (May 1998) (“Swanson”)
1014	U.S. Patent No. 3,845,391
1015	U.S. Patent No. 4,931,871
1016	U.S. Patent No. 3,004,104
1017	U.S. Patent No. 5,629,739
1018	U.S. Patent No. 5,745,604 (“604 Patent”)
1019	U.S. Patent No. 5,579,124
1020	Ingemar J. Cox et al., “Secure Spread Spectrum Watermarking for Multimedia,” in <i>NEC Research Institute Technical Report 95-10</i> , pp. 1-33 (1995) (“Cox-1995”)

1021	Chung-Ping Wu et al., "Robust and efficient digital audio watermarking using audio content analysis," in <i>Proceedings of SPIE</i> , Vol. 3971, pp. 382-392 (2000) ("Wu") (from pages 16-26 of the Rachel J. Watters Declaration, Ex. 1053)
1022	U.S. Patent No. 6,151,578
1023	Qiang Cheng et al., "Spread Spectrum Signaling for Speech Watermarking," in <i>Proceedings of 2001 IEEE International Conference on Acoustics, Speech, and Signal Processing</i> , vol. 3, pp. 1337-1340 (2001) (from pages 12-15 of the Rachel J. Watters Declaration, Ex. 1054)
1024	U.S. Patent No. 7,133,534
1025	Declaration of Dr. Mary K. Bolin
1026	Declaration of Gordon MacPherson Relating to Ex. 1008
1027	U.S. Patent No. 6,996,521
1028	Jean-Claude Risset, "Exploration of Timbre by Analysis and Synthesis," in <i>The Psychology of Music</i> , pp. 113-169 (2nd ed. 1999)
1029	Hideo Suzuki et al., "On the Perception of Phase Distortion," in <i>Journal of the Audio Engineering Society</i> , vol. 28, no. 9, pp. 570-574 (1980)
1030	Declaration of Ziaad Khan Relating to Ex. 1008
1031	Stanley P. Lipshitz, "On the Audibility of Midrange Phase Distortion in Audio Systems," in <i>Journal of the Audio Engineering Society</i> , vol. 30, no. 9, pp. 580-595 (Sept. 1982)
1032	Wen-Nung Lie et al., "Robust and High-Quality Time-Domain Audio Watermarking Subject to Psychoacoustic Masking," in <i>2001 IEEE International Symposium on Circuits and Systems</i> , vol. 2, pp. 45-48 (2001) ("Lie")
1033	Kaliappan Gopalan et al., "Data Embedding in Audio Signals," in <i>2001 IEEE Aerospace Conference Proceedings</i> , vol. 6, pp. 2713-2720 (2001)
1034	Declaration of Rachel J. Watters Relating to Exhibit 1011
1035	Alessandro Piva et al., "Managing Copyright in Open Networks," in <i>IEEE Internet Computing</i> , vol. 6, no. 3, pp. 18-26 (2002)
1036	Reserved- Not Used
1037	U.S. Patent Application Publication 2003/0028381
1038	U.S. Patent Application Publication 2003/0076245
1039	Ingemar Cox et al., "The First 50 Years of Electronic Watermarking," in <i>EURASIP Journal on Advances in Signal Processing</i> , pp. 126-132 (2002)

1040	Changsheng Xu et al., "Content-Based Digital Watermarking for Compressed Audio," in <i>RIAO2000: Content-Based Multimedia Information Access</i> , vol. 1, pp. 390-402 (2000)
1041	Jaap Haitsma et al., "Audio Watermarking for Monitoring and Copy Protection," in <i>ACM Multimedia Workshop</i> , pp. 119-122 (2000)
1042	U.S. Patent No. 6,633,653 ("Hobson")
1043	U.S. Patent No. 6,298,322
1044	U.S. Patent No. 5,450,490 ("Jensen")
1045	U.S. Patent No. 6,175,627 ("Petrovic")
1046	Ingemar Cox et al., "Some General Methods for Tampering with Watermarks," in <i>IEEE Journal on Selected Areas in Communications</i> , vol. 16, no. 4, pp. 587-593 (May 1998)
1047	U.S. Patent No. 5,949,055
1048	U.S. Patent No. 6,101,602
1049	U.S. Patent No. 6,064,737
1050	U.S. Patent No. 6,141,441
1051	Frank Hartung, "Multimedia Watermarking Techniques," in <i>Proceedings of the IEEE</i> , vol. 87, no. 7, pp. 1079-1107 (July 1999)
1052	Neil Johnson, "Exploring Steganography: Seeing the Unseen," in <i>Computer</i> , vol. 31, no. 26-34 (Feb. 1998)
1053	Declaration of Rachel J. Watters Relating to Exhibit 1021
1054	Declaration of Rachel J. Watters Relating to Exhibit 1023
1055	Ingemar J. Cox et al., "Secure Spread Spectrum Watermarking for Multimedia," in <i>IEEE Transactions on Image Processing</i> , vol. 6, no. 12, pp. 1673-1687 (Dec. 1997) ("Cox-SSSW")
1056	Declaration of Gordon MacPherson Relating to Exhibit 1055
1057	<i>Sotera</i> Stipulation to be filed on September 23, 2022 in the U.S. District Court for the Central District of California
1058	Settlement Agreement

I. INTRODUCTION

Pursuant to 35 U.S.C. § 317(a), 37 C.F.R. § 42.74, and the Board’s authorization e-mail of May 4, 2023, Petitioners Sony Group Corporation (Japan), Sony Corporation of America, Sony Interactive Entertainment LLC, Sony Pictures Entertainment Inc., and Sony Electronics Inc. (collectively “the Sony Petitioners”) and Patent Owner MZ Audio Science, LLC jointly request termination of the Sony Petitioners from IPR2022-01544 as a result of a settlement. Petitioner Verance Corporation (“Verance”) will remain as the sole Petitioner in the IPR. Verance does not oppose this request to terminate the Sony Petitioners.

Pursuant to 35 U.S.C. § 317(b) and 37 C.F.R. § 42.74(b), a true copy of the written settlement agreement is being filed herewith as Exhibit 1058. This agreement resolves the dispute between Patent Owner and the Sony Petitioners concerning U.S. Patent No. 7,289,961 (“the ‘961 patent”). Patent Owner and the Sony Petitioners certify that there are no collateral agreements or understandings made in connection with, or in contemplation of, the termination of this IPR.

Pursuant to 35 U.S.C. § 317(b) and 37 C.F.R. § 42.74(c), and the Board’s authorization e-mail, a Joint Request that the Settlement Agreement Be Treated as Business Confidential Information is being filed concurrently, and the copy of the agreement (Ex. 1058) is being filed as Board and Parties Only.

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