

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

ADT LLC

Petitioner,

v.

SCRIPT SECURITY SOLUTIONS LLC,

Patent Owner

Case IPR2016-00741 (Patent 7,113,091)

**JOINT MOTION TO TERMINATE THE *INTER PARTES* REVIEW WITH
REGARD TO PETITIONER ADT LLC**

Pursuant to 35 U.S.C. § 317(a) and 37 C.F.R. § 42.72, Patent Owner Script Security Solutions, LLC and Petitioner ADT, LLC (“ADT”) (collectively, “the Parties”), hereby provide notice that the Parties have entered into a settlement agreement and jointly request termination of *Inter Partes* Review Case No. IPR2016-00741 with regard to Petitioner ADT and its identified real parties-in-interest iControl Networks, Inc., ADT US Holdings, Inc., ADT Holdings, Inc., and the ADT Corporation.

The Parties 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, it is prior to full briefing on the issues raised in the above-captioned *Inter Partes* Review, and the Board has not issued a final written decision (or even instituted trial). Further, ADT represents that it and its identified real parties-in-interest will no longer participate in the IPR proceedings even if the Board does not terminate its participation in the above-captioned *Inter Partes* Review. That means ADT and its identified real parties-in-interest will not: (i) participate in the filing or preparation of any further papers; (ii) participate or aid in any cross examination of Patent Owner’s witnesses; and (iii) participate or help prepare for 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 Confidential Settlement Agreement resolving the dispute in the above-captioned *Inter Partes* Review and the underlying litigation pending in the Eastern District of Texas, Case No. 2:15-cv-00369 (consolidated into lead Case No. 2:15-cv-1030). *See* Confidential Exhibit 2003. No other related agreements exist between Patent Owner and Petitioner ADT.

The Parties are concurrently filing a Joint Request that the Settlement Agreement, Confidential Exhibits 2003, shall be treated as business confidential information, shall be kept separate from the file of the involved patents, and shall be 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).

Respectfully Submitted,

Dated: June 24, 2016

/s/ Zachariah S. Harrington

Zachariah S. Harrington (Reg. No. 44,742)

zac@ahtlawfirm.com

Matthew J. Antonelli (Reg No. 45,973)

matt@ahtlawfirm.com

Larry D. Thompson, Jr. (Reg. No. 43,952)

larry@ahtlawfirm.com

Stephen D. Zinda (Reg No. 67,272)

stephen@ahtlawfirm.com

ANTONELLI, HARRINGTON &

THOMPSON LLP

4306 Yoakum Boulevard, Suite 450

Houston, TX 77006
(t) (713) 581-3000
(f) (713) 581-3020

Dated: June 24, 2016

/s Jackson Ho

Jackson Ho (Reg. No. 72,360)
K&L GATES LLP
630 Hansen Way
Palo Alto, CA 94304
T: (650) 798-6719
F: (650) 798-6701
Email: jackson.ho@klgates.com

David A. Simons (Reg. No. 45,888)
K&L GATES LLP
State Street Financial Center
One Lincoln Street
Boston, MA 02111-2950
T: (617) 261-3100
F: (617) 261-3175
Email: david.simons@klgates.com

CERTIFICATE OF SERVICE

The undersigned certifies that the above-captioned JOINT MOTION TO TERMINATE was served on June 24, 2016 by delivering a copy via electronic mail to the attorneys of record for Petitioners as follows:

jackson.ho@klgates.com (Lead Counsel)
david.simons@klgates.com (Back-Up Counsel)

Dated: June 24, 2016

/s/ Zachariah S. Harrington

Zachariah S. Harrington (Reg. No. 44,742)

zac@ahtlawfirm.com

ANTONELLI, HARRINGTON &
THOMPSON LLP

4306 Yoakum Boulevard, Suite 450

Houston, TX 77006

(t) (713) 581-3000

(f) (713) 581-3020