

**From:** [Trials](#)  
**To:** [David Holt](#); [Trials](#)  
**Cc:** [Russell Blythe](#); [Mikaela Stone](#); [OpenText-IPR/PGR](#); [paul.hart@eriseip.com](#); [Hunter.Horton@eriseip.com](#); [Karl Renner](#); [Brian Eutermoser](#); [Adam.Seitz@eriseip.com](#); [Callie.Pendergrass@eriseip.com](#); [PTAB Inbound](#)  
**Subject:** RE: CrowdStrike v Open Text / Webroot IPRs: Request to File Motions to Terminate  
**Date:** Monday, November 13, 2023 1:43:16 PM

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Counsel,

From the Board –

In each of the referenced proceedings, the parties are authorized to file a Joint Motion To Terminate (as a Paper), and a Joint Request to File Settlement Agreement as Business Confidential Information Pursuant to 35 U.S.C. § 317(b) (as a separate Paper) if necessary.

The Joint Motion To Terminate should reference this authorization. The Joint Motion To Terminate also must update the Board concerning the status of any litigation or proceeding, including, but not limited to, proceedings in the U.S. Patent and Trademark Office, involving the subject patent, and advise the Board whether any litigation or proceeding involving the subject patent is contemplated in the foreseeable future. The Joint Motion To Terminate must include a true copy of any agreement or understanding (as an Exhibit to the Motion) and include a statement certifying that there are no collateral agreements or understandings made in connection with, or in contemplation of, the termination of the inter partes review. See 35 U.S.C. § 317(b); 37 C.F.R. § 42.74(b).

Any Joint Request to File the Settlement Agreement As Business Confidential Information must be filed with the Joint Motion To Terminate. See 35 U.S.C. § 317(b); 37 C.F.R. § 42.74(c).

Regards,

Esther Goldschlager  
Supervisory Paralegal Specialist  
Patent Trial & Appeal Board  
U.S. Patent & Trademark Office

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**From:** David Holt <DTH@fr.com>  
**Sent:** Wednesday, November 8, 2023 12:53 PM  
**To:** Trials <Trials@USPTO.GOV>  
**Cc:** Russell Blythe <RBlythe@KSLAW.com>; Mikaela Stone <Mikaela.Stone@KSLAW.com>; OpenText-IPR/PGR <OpenText-IPR-PGR@KSLAW.com>; paul.hart@eriseip.com; Hunter.Horton@eriseip.com; Karl Renner <renner@fr.com>; Brian Eutermoser <BEutermoser@KSLAW.com>; Adam.Seitz@eriseip.com; Callie.Pendergrass@eriseip.com; PTAB Inbound <PTABInbound@fr.com>  
**Subject:** CrowdStrike v Open Text / Webroot IPRs: Request to File Motions to Terminate

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Your Honors,

Petitioner CrowdStrike, Inc. and Patent Owners Open Text Inc. and Webroot, Inc. respectfully request permission from the Board to file Joint Motions to Terminate the following IPR proceedings: IPR2022-01522, IPR2023-00124, -00126, -00289, -00556, -01050, -01051, -01052, -01053, -01158, -01159. The parties have entered into an agreement, and that agreement resolves the entire dispute between the parties. The parties also seek permission to file a "Joint Request to File the Agreement as Business Confidential Information Pursuant to 35 U.S.C. § 317 and 37 C.F.R. § 42.74" in each proceeding.

If the Board needs further information, please let us know.

Sincerely,

**David Holt**  
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