

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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CROWDSTRIKE, INC.,

Petitioner,

v.

TAASERA LICENSING LLC,

Patent Owner.

Patent No. 9,923,918

Filing Date: March 27, 2017

Issue Date: March 20, 2018

Inventors: Blair Gaver Nicodemus and Billy Edison Stephens

Title: METHODS AND SYSTEMS FOR CONTROLLING ACCESS  
TO COMPUTING RESOURCES BASED ON KNOWN  
SECURITY VULNERABILITIES

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**JOINT MOTION TO TERMINATE PROCEEDING**

Case No. IPR2024-00039

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**LIST OF EXHIBITS**

<b>Exhibit No.</b>	<b>Description</b>
<b>2001</b>	Confidential Settlement Agreement
<b>2002</b>	Confidential Release

Pursuant to 35 U.S.C. § 317(a), 37 C.F.R. § 42.74, and the Board’s email of December 20, 2023, Petitioner CrowdStrike, Inc. (“CrowdStrike” or “Petitioner”) and Patent Owner Taasera Licensing LLC (“Taasera” or “Patent Owner”) (collectively, the “Parties”) have reached a resolution and jointly move to terminate the above-captioned proceeding.

## **I. STATEMENT OF FACTS**

The Parties have reached an agreement to resolve their disputes in the above-captioned *inter partes* review relating to U.S. Patent No. 9,923,918.

Pursuant to 35 U.S.C. § 317(b) and 37 C.F.R. § 42.74(b), Petitioner and Patent Owner submit a true copy of the confidential settlement agreement in its entirety, filed herewith as Exhibit 2001. Petitioner and Patent Owner further submit a true copy of a confidential release signed by the Parties, filed herewith as Exhibit 2002. A “Joint Request to File Settlement Agreement as Business Confidential Information Pursuant to 35 U.S.C. § 317 and 37 C.F.R. § 42.74” is being filed concurrently with this Joint Motion to Terminate, to treat Exhibits 2001 and 2002 as business confidential information and to keep them separate from the files of the involved patent pursuant to 35 U.S.C. § 317(b) and 37 C.F.R. § 42.74(c). There are no other collateral agreements between the Parties made in connection with, or in contemplation of, the termination sought.

## II. RELIEF REQUESTED

Termination of this *inter partes* review is requested, and the Parties respectfully submit that such termination is justified. “There are strong public policy reasons to favor settlement between the parties to a proceeding.” Consolidated Trial Practice Guide 86 (Nov. 2019). “The Board expects that a proceeding will terminate after the filing of a settlement agreement, unless the Board has already decided the merits of the proceeding.” *Id.* (citing 35 U.S.C. §§ 317(a)).

The Board should terminate this proceeding, as the Parties jointly request, for the following reasons.

**First**, CrowdStrike and Taasera have met the statutory requirement that they file a “joint request” to terminate before the Office “has decided the merits of the proceeding.” 35 U.S.C. § 317(a). Under section 317(a), an *inter partes* review shall be terminated upon such joint request “unless the Office has decided the merits of the proceeding before the request for termination is filed.” There are no other preconditions recited in 35 U.S.C. § 317(a).

**Second**, CrowdStrike and Taasera have reached a resolution as to all the disputes in this proceeding and as to the ’918 patent. Pursuant to 35 U.S.C. § 317(b) and 37 C.F.R. § 42.74(b), the agreement made in connection with, or in contemplation of, the termination of the proceeding is in writing, and a true and

correct copy is being filed concurrently herewith as Exhibit 2001.<sup>1</sup> A true and correct copy of a confidential release is being filed concurrently herewith as Exhibit 2002.<sup>2</sup> The Parties are also filing concurrently herewith a joint request under 35 U.S.C. § 317(b) and 37 C.F.R. § 42.74(c) to treat these agreements as business confidential information and keep them separate from the files of the '918 patent. The Parties certify that there are no other agreements, oral or written, between the Parties made in connection with, or in contemplation of, the termination of this proceeding.

**Third**, termination would save significant further expenditure of resources by the Parties. Termination upon settlement, as requested, would also further the purpose of *inter partes* review proceedings, which seek to provide an efficient and less costly alternative forum for patent disputes. Further, maintaining the proceeding would discourage further resolutions, as patent owners in similar situations would have a strong disincentive to resolve the dispute if they perceived that an *inter partes* review would continue regardless of a resolution.

### III. CONCLUSION

For the foregoing reasons, CrowdStrike and Taasera respectfully request termination of this *inter partes* review.

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<sup>1</sup> The agreement is being filed via the Patent Trial and Appeal Board Case Tracking System (PTACTS) system with access to the “Board only.”

<sup>2</sup> The agreement is being filed via the Patent Trial and Appeal Board Case Tracking System (PTACTS) system with access to “Parties and Board.”

Dated: December 22, 2023

Respectfully submitted,

/s/ Peter Lambrianakos

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**CERTIFICATE OF SERVICE**

A copy of the JOINT MOTION TO TERMINATE PROCEEDINGS and Exhibit 2002 has been served on Petitioner's counsel of record as follows:

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December 22, 2023                      By: / Peter Lambrianakos /  
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