

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

GOOGLE LLC,

Petitioner,

v.

SOUNDCLEAR TECHNOLOGIES LLC,

Patent Owner.

IPR2025-01123
Patent No. 11,069,337

**PETITIONER GOOGLE LLC'S UNOPPOSED MOTION TO
WITHDRAW PETITION**

Pursuant to 37 C.F.R. § 42.71(a) and the Board's authorization by email on October 1, 2025, Petitioner Google LLC moves to withdraw its petition and terminate the above-captioned proceeding, IPR2025-01123, seeking Inter Partes Review of claims 1-5 of U.S. Patent No. 11,069,337 ("the '337 patent"). Patent Owner SoundClear does not oppose Petitioner's request.

On July 25, 2024, SoundClear asserted the '337 patent against Google in *SoundClear Technologies LLC v. Google LLC*, 3:24-cv-00540 (E.D. Va.). The same day, SoundClear separately asserted the '337 patent against Amazon in *SoundClear Technologies LLC v. Amazon.com, Inc. et al.*, 1:24-cv-01283 (E.D. Va.). Google filed the IPR petition initiating this proceeding on June 12, 2025, based on one obvious ground based on the combination of *Ocampo* and *Yi* references. Paper 1. Amazon, however, had filed an earlier IPR petition on January 31, 2025, seeking review based on five grounds: one anticipation ground based on *Shin*, and four obviousness combinations based on one or more of *Shin*, *Shimomura*, and *Kristjansson*. *Amazon.com, Inc., et al. v. SoundClear Technologies LLC*, IPR2025-00565, Paper 1 ("the Amazon IPR"). In the meantime, the Board granted institution in the Amazon IPR on August 27, 2025. IPR2025-00565, Paper 12 (August 27, 2025). And on September 29, 2025, Google timely filed a copycat IPR petition with a motion for joinder to the Amazon IPR. *See Google LLC v. SoundClear Technologies LLC*, IPR2025-

01597, Papers 1, 3. Accordingly, to promote efficiency and avoid duplicative proceedings, Petitioner respectfully requests that the Board dismiss the Petition and this proceeding.

Petitioner's motion to withdraw aligns with the AIA's statutory goals of efficiency, justice, and speed. This proceeding remains in its early stages, with pre-institution having just begun. To date, only Patent Owner's Discretionary Denial Brief has been filed. Dismissing this proceeding would thus avoid significant work still to be done by both parties and the Board. For example, dismissing this proceeding now will avoid any further Discretionary Denial briefing and preparation of a Director Decision, a possible Patent Owner Preliminary Response, the Board's Institution Decision and, to the extent that Institution is granted, the Patent Owner's Response, Petitioner's Reply, Patent Owner Surreply, and all associated mandatory discovery, along with possible motions to exclude, preparation for and participation in the oral argument, and the Board's preparation of the Final Written Decision. Terminating the proceeding now would thus serve the interests of judicial economy and the mutual interest of the parties. Moreover, Patent Owner does not oppose this request.

Pursuant to 35 U.S.C. § 317(b), there are no collateral agreements or understandings made in connection with, or in contemplation of, the termination

of the proceeding. Accordingly, Petitioner Google respectfully requests withdrawal of its Petition for Inter Partes Review of claims 1-5 of '337 Patent and dismissal of this proceeding.

Dated: October 7, 2025

Respectfully submitted,

/Erika H. Arner/

Erika H. Arner

Lead Counsel

Reg. No. 57,540

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing **UNOPPOSED MOTION TO TERMINATE PROCEEDING** was served on October 7, 2025, via email directed to counsel of record for the Patent Owner at the following:

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