

**UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE PATENT TRIAL AND APPEAL BOARD**

JUNIPER NETWORKS, INC.

Petitioner

v.

IMPLICIT, LLC

Patent Owner

Case: IPR2020-00587

Patent No. 9,591,104

**PATENT OWNER'S RESPONSE TO PETITION FOR *INTER PARTES*
REVIEW OF U.S. PATENT NO. 9,591,104**

Patent Owner Implicit, LLC (“Implicit”) files this Patent Owner’s Response to update the Board on the status of these proceedings.

On October 7, 2020, Implicit and Juniper Networks, Inc. (“Juniper”) filed a Motion in the accompanying *Implicit v. Juniper* District Court proceedings notifying the Court that the parties settled, in principle, the claims between them:

Plaintiff Implicit, LLC (“Implicit”) and Defendant Juniper Networks, Inc. (“Juniper”) hereby notify the Court that they have settled, in principle, the claims between them. Accordingly Plaintiff Implicit and Defendant Juniper jointly move the Court to stay all deadlines in the above-captioned case until November 6, 2020, to allow the parties to finalize the settlement of this matter.

Implicit, LLC v. Imperva, Inc. et. al., Case No. 2:19-CV-00040-JRG-RSP (E.D. Tex. Oct. 7, 2020) (Dkt. 274). The Court stayed all deadlines until November 6, 2020 to allow the parties to finalize the settlement:

Before the Court is the Joint Motion to Stay All Deadlines and Notice of Settlement Between Plaintiff Implicit, LLC and Defendant Juniper Networks, Inc. filed by Implicit and Juniper. Dkt. No. 274. The parties’ Joint Motion notifies the Court that they have settled in principle the claims between them and seek a stay of all deadlines in the above-captioned matter until November 6, 2020 to allow the parties to finalize the settlement.

After due consideration, the Court **GRANTS** the Motion. The Court thereby **ORDERS** that the above-captioned matter is **STAYED** with respect to Implicit and Juniper until November 6, 2020.

Implicit, LLC v. Imperva, Inc. et. al., Case No. 2:19-CV-00040-JRG-RSP (E.D. Tex. Oct. 7, 2020) (Dkt. 274). Implicit thus expects that, upon finalization of the settlement, the parties will request to terminate these proceedings under 35 U.S.C. § 317 and 35 C.F.R. § 42.74. Implicit reserves all rights to address the Institution Decision in the event that these proceedings are not terminated.

Dated: November 2, 2020

Respectfully submitted,

DAVIS FIRM, PC

By: /Christian Hurt/
Christian Hurt

CERTIFICATE OF SERVICE

I hereby certify that on November 2, 2020, a true copy of the following document(s):

**PATENT OWNER IMPLICIT, LLC'S RESPONSE TO PETITION FOR
INTER PARTES REVIEW OF U.S. PATENT NO. 9,591,104**

was served via email to the address and parties as follows:

Juniper-Implicit@irell.com
Jonathan M. Lindsay
David McPhie
Courtney Dennis
Irell & Manella LLP
840 Newport Center Drive, Suite 400
Newport Beach, CA 92660

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on November 2, 2020 at Dallas, Texas.

/Christian Hurt/

Christian Hurt