

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

LG ENERGY SOLUTION, LTD.,
SAMSUNG ELECTRONICS CO., LTD., and
SAMSUNG ELECTRONICS AMERICA, INC.,
Petitioner

v.

MOLECULAR REBAR DESIGN, LLC,
Patent Owner

Case IPR2024-01005¹

U.S. Patent 9,636,649

PATENT OWNER'S SUR-REPLY

¹ Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc., which filed a petition in IPR2025-00355, have been joined as petitioners in this proceeding.

In an effort to streamline and simplify the issues in the various IPR proceedings involving Patent Owner and Petitioner—namely IPR2024-01005, IPR2024-01006, IPR2024-01011, IPR2024-01012 and IPR2024-01013—Patent Owner has statutorily disclaimed all claims of U.S. Patent No. 9,636,649. Patent Owner anticipates that the Board will enter an order of adverse judgment under 37 C.F.R. § 42.73(b) resulting in the termination of these proceedings, obviating any reason to substantively respond to Petitioner’s Reply (Paper 23). To remove all doubt, Patent Owner does not concede that any of the arguments or positions raised by Petitioner in this proceeding have any merit, and the decision to forego responding to the Reply on the merits should not be interpreted as such a concession.

Dated: August 25, 2025

Respectfully submitted,

/Stephen Zinda/

Stephen Zinda (Reg. #67,272)
Counsel for Patent Owner

CERTIFICATE OF COMPLIANCE

The undersigned certifies that this document complies with the type-volume limitations set forth in 37 C.F.R. § 42.24 *et seq.* This document, excluding those portions excluded under § 42.24(a)(1), contains 133 words as calculated by the program used in creating it.

/Stephen D. Zinda/
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CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. §§ 42.6(e)(4), the undersigned certifies that on August 25, 2025, the foregoing document was served via electronic mail on the following attorneys of record at the indicated e-mail address, which Petitioner has consented to electronic service for:

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