

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 IPR2024-01011¹
Patent 8,968,924

**PETITIONER'S OBSERVATIONS ON
CROSS EXAMINATION OF DR. ZHU**

¹ Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. were joined as parties to this proceeding via a Motion for Joinder in IPR2025-00357.

As authorized by the Board on September 3, 2025 (Ex. 3002), LG Energy Solution (“Petitioner”) respectfully submits this paper regarding the August 11, 2025 and August 12, 2025 cross-examination testimonies of Dr. Yu Zhu, which are presented in their entirety in Ex. 2043 and Ex. 2044, respectively.

CITATION 1:

In response to Patent Owner’s citation to Ex. 2043 at 14:8-16 (PO’s Sur-Reply, Pap. 31, 16-17), Petitioner cites to Ex. 2044 at 12:23-14:3 for context.

CITATION 2:

In response to Patent Owner’s citation to Ex. 2044 at 8:15-9:18 (PO’s Sur-Reply, Pap. 31, 17-18), Petitioner cites to Ex. 2043 at 14:17-15:4 for context.

CITATION 3:

In response to Patent Owner’s citation to Ex. 2044 at 7:21-9:18 (PO’s Sur-Reply, Pap. 31, 17-18), Petitioner cites to Ex. 2043 at 14:8-15:4 and Ex. 2044 at 12:23-14:3 for context.

Respectfully submitted,

Dated: September 5, 2025

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CERTIFICATE OF SERVICE

Pursuant to 37 CFR §§ 42.6(e)(4)(i) et seq. and 42.105(b), the undersigned certifies that on September 5, 2025, a complete and entire copy of this Petitioner's Observations on Cross Examination of Dr. Zhu was provided by electronic mail to the Patent Owner by serving the correspondence e-mail address of record as follows:

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