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 IPR2024-01011[1]
Patent 8,968,924 B2

PETITIONER LG ENERGY SOLUTION, LTD.'S NOTICE OF APPEAL

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

Pursuant to 35 U.S.C. §§ 141(c), 142, and 319, 37 C.F.R. § 90.2(a), notice is hereby given that Petitioner LG Energy Solution, Ltd. ("LGES") appeals to the United States Court of Appeals for the Federal Circuit from the Final Written Decision, entered December 15, 2025 (Paper 38) ("Final Written Decision"), and the Decision Denying Petitioner's Request for Rehearing, entered May 13, 2026 (Paper 47) ("Rehearing Decision"), in Case No. IPR2024-01011 by the Patent Trial and Appeal Board ("the Board"), and from all underlying orders, decisions, rulings, and opinions related thereto and included therein that are adverse to LGES. This appeal is timely under 35 U.S.C. § 142, 37 C.F.R. § 90.3, Federal Rule of Appellate Procedure 15(a)(1), and Federal Circuit Rule 15(a)(1).

For the limited purpose of providing the Director with the information required by 37 C.F.R. § 90.2(a)(3)(ii) and Federal Rule of Appellate Procedure 15(a)(2)(C), the issues on appeal may include, but are not limited to:

1. The Board's decision that claims 1-5 of the '924 patent were not shown to be unpatentable as obvious under 35 U.S.C. § 103 in view of:
    a. Ohata and Kavan for claims 1, 4, 5;
    b. Cheng and Gan for claims 1, 4, 5;
    c. Cheng, Gan, and Zhao for claims 2, 3;

2. All of the Board's subsidiary findings supporting its determination that claims 1-5 of the '924 patent were not shown to be unpatentable under 35 U.S.C. § 103; the Board's failure to consider evidence of record properly; the Board's legal errors in undertaking the obviousness analysis; the Board's findings that conflict with the evidence of record and are not supported by substantial evidence; and
3. All other issues decided adversely to Petitioner in any orders, decisions, rulings, or opinions underlying or supporting the Final Written Decision and Rehearing Decision.

LGES further reserves the right to challenge any finding or determination supporting or relating to the issues above and reserves the right to address any issues that may arise on appeal or that Patent Owner may raise on appeal.

Pursuant to 35 U.S.C. § 142 and 37 C.F.R. § 90.2(a)(1), this notice is being filed with the Director of the U.S. Patent and Trademark Office, and a copy is also being filed with the Board. In addition, pursuant to Federal Circuit Rule 15(a)(1) and 37 C.F.R. § 90.2(a)(2), LGES also is electronically filing this notice with the Clerk of the U.S. Court of Appeals for the Federal Circuit, and paying the fee set forth in Federal Circuit Rule 52.

Respectfully submitted,

Date: June 9, 2026

/W. Karl Renner/

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Attorneys for Petitioner LG Energy Solution, Ltd.

CERTIFICATE OF SERVICE

Pursuant to 37 CFR §§ 42.6(e)(4) and 42.205(b), the undersigned certifies that on June 9, 2026, a complete and entire copy of this Petitioner's Notice of Appeal was provided via email to the Patent Owner by serving the correspondence address of record as follows:

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Pursuant to 37 C.F.R. §§ 90.2(a)(1), I hereby certify that in addition to being filed electronically through the Board's P-TACTS System, this Petitioner's Notice of Appeal is being provided to the Director of the USPTO on June 9, 2026, by electronically filing to the email address as follows:

Director of the United States Patent and Trademark Office
c/o Office of the General Counsel
efileSO@uspto.gov

I hereby certify that on June 9, 2026, a true and correct a copy of the foregoing Petitioner's Notice of Appeal, along with a copy of the Final Written Decision and Rehearing Decision, were filed electronically with the Clerk's Office

of the United States Court of Appeals for the Federal Circuit, at the following address:

United States Court of Appeals for the Federal Circuit
717 Madison Place, N.W., Suite 401
Washington, DC 20005

Date: June 9, 2026

/W. Karl Renner/

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