

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAMSUNG DISPLAY CO., LTD.
Petitioner

v.

PICTIVA DISPLAYS INTERNATIONAL LTD.,
Patent Owner

Case No. 2024-01094
Patent No. 8,558,223

**PATENT OWNER'S OBJECTIONS TO EVIDENCE
PURSUANT TO 37 C.F.R. § 42.64(b)**

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Patent Trial and Appeal Board
U.S. Patent and Trademark Office
P.O. Box 1450
Alexandria, VA 22313-1450

Pursuant to 37 C.F.R. § 42.64(b)(1), Patent Owner Pictiva Displays International Ltd. (“Pictiva”), submits the following objections to evidence accompanying Petitioner’s Reply. These objections are timely under 37 C.F.R. § 42.64(b)(1) because they are being filed within five (5) business days of service of Petitioner’s Reply to Patent Owner’s Response on August 11, 2025.

Pictiva reserves the right to present further objections to these or additional Exhibits submitted by Petitioner, as allowed by the applicable rules or other authority, including without limitation upon conclusion of any depositions taken of Petitioner’s witnesses.

Evidence	F.R.E. / C.F.R.	Objection(s)
EX1020 (Rand Decl.)	F.R.E. 702 & 37 C.F.R. §§ 42.65, 42.104	Pictiva objects to ¶¶ 5-59 because Dr. Rand’s testimony is not based on sufficient facts or data, is not the product of reliable principles and methods, and does not reflect a reliable application of the principles and methods to the facts of the case. This includes his apparent failure to review the appropriate underlying documents. Pictiva also objects to these paragraphs to the extent they contain new theories and arguments not present in the original declaration, including Dr. Rand’s apparent attempt to pivot to new combinations of metal complexes and organic compounds for his obviousness theory.
EX1020 (Rand Decl.)	F.R.E. 901	Pictiva objects to EX1020 because Petitioner has not established the authenticity of documents Dr. Rand cites or relies on.

Evidence	F.R.E. / C.F.R.	Objection(s)
EX1021 (Schanze Deposition Tr.)	F.R.E. 106 & 37 C.F.R. §§ 42.11, 42.51	Pictiva objects to EX1021 because Petitioner fails to provide the complete transcript and exhibits. Pictiva further objects to EX1021 because the exhibits that Petitioner chose to withhold are ones inconsistent with the positions advanced by Samsung in this proceeding.
EX1024	37 C.F.R. § 42.63(b)	Pictiva objects to EX1024 because the document is in German and Samsung fails to provide a translated version of the document
EX1025, EX1032, EX1038, EX1039	F.R.E. 901, 801-804	Pictiva objects to the exhibits because they are from a different proceeding and Petitioner attempts to rely on the statements therein to prove the truth of the matters allegedly stated in those documents.
EX1037 (Munford Declaration)	FRE 402, 403, 701, 702	Pictiva objects to the declaration because Petitioner has failed to obtain authorization to file the declaration and because it chose to delay the filing of the declaration after it had used another declaration by a declarant who was unwilling to sit for deposition to gain institution of the trial. The gamesmanship resulted in undue prejudice to the Patent Owner. Additionally, Ms. Munford lacks relevant personal knowledge of the prior art status of the Ma reference, and is disguising that fact by couching her declaration as an expert declaration.

Dated: August 18, 2025

Respectfully submitted,

By: /Hong Zhong/

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CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6, the undersigned certifies that on August 18, 2025, a copy of the foregoing **PATENT OWNER'S OBJECTIONS TO EVIDENCE PURSUANT TO 37 C.F.R. § 42.64(b)** was served by electronic mail, as agreed to by the parties, upon the following:

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