

Exhibit F

(Filed Under Seal)

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

BOE Technology Group Co., Ltd.
Petitioner

v.

Optronic Sciences LLC
Patent Owner

Inter Partes Review No.: IPR2024-01132

**PETITIONER'S REPLY TO PATENT OWNER'S RESPONSE TO
PETITION FOR INTER PARTES REVIEW OF U.S. PATENT 7,586,121**

his construction for “passivation layer.” EX1020, ¶12 His opinions and testimony are simply not credible, and the Board should give his opinions on “passivation layer” no weight.

1. Patent Owner's Arguments Under Ground 1 Confirm Its Construction Of “Passivation Layer” Should Be Rejected

Patent Owner and its expert argue under Ground 1 that a POSITA would not consider a layer of organic resin to be a passivation layer because the organic resin (and specifically the organic molecules that form an organic resin), do not tie up dangling bonds. POR at 11; EX2005 at ¶71. However, as addressed below for Ground 1, there are multiple instances of inventors at the very same original assignee of the 121 patent that expressly disclose passivation layers formed of organic materials, in direct contradiction to the construction peddled by Patent Owner and its expert. See §III.B.1.a.

In conclusion, Patent Owner's construction of passivation layer is unsupported by the 121 patent and extrinsic evidence, and should be summarily rejected as erroneous.

B. Capping Layer

A POSITA would understand from the 121 patent that there is no special meaning ascribed to “capping layer” other than it is an insulation material. Pet. 19; EX1002, ¶61.