

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.

Case No.: IPR2024-01132

Patent 7,586,121

PATENT OWNER'S MOTION TO SEAL

Patent Owner’s Exhibit List for IPR2024-01131

Ex. No.	Description
2001	Declaration of Benjamin T. Wang in Support of Motion to Appear <i>Pro Hac Vice</i>
2002	Declaration of Andrew D. Weiss in Support of Motion to Appear <i>Pro Hac Vice</i>
2003	Declaration of Christian W. Conkle in Support of Motion to Appear <i>Pro Hac Vice</i>
2004	Declaration of Paul A. Kroeger in Support of Motion to Appear <i>Pro Hac Vice</i>
2005	Declaration of Dr. Eric Bretschneider in support of Patent Owner’s Response (“Bretschneider Decl.”)
2006	<i>Curriculum vitae</i> of Dr. Eric Bretschneider
2007	April 17, 2025, Deposition Transcript of Dr. Dean Neikirk, <i>IPR2024-01132, IPR-2024-01315</i>
2008	Roel. J. Theeuwes, <i>Surface passivation approaches for silicon, germanium, and III-V semiconductors</i> , J. VAC. SCI. TECHNOL., A.42, 060801 (2024).
2009	Mark LaPedus, <i>Capping Tools Tame Electromigration</i> , Semiconductor Engineering (2012) (https://semiengineering.com/capping-tools-tame-electromigration) (Wayback Machine capture from June 20, 2014, available at https://web.archive.org/web/20140620152135/https://semiengineering.com/capping-tools-tame-electromigration , accessed May 6, 2025).
2010	Excerpts from WILEY ELECTRICAL AND ELECTRONICS ENGINEERING DICTIONARY (2004).
2011	Excerpts from William S. Rees, <i>CVD OF NONMETALS</i> (1996).
2012	Excerpts from MCGRAW-HILL DICTIONARY OF SCIENTIFIC AND TECHNICAL TERMS (5th Edition) (1994).
2013	<i>Passivation (chemistry)</i> , WIKIPEDIA, available at https://en.wikipedia.org/wiki/Passivation_(chemistry) (last accessed Sept. 15, 2025).
2014	Excerpt from <i>BOE Technology Group Co., Ltd.’s Fourth Supplemental Responses To Plaintiff’s First Set Of Interrogatories (Nos. 1-13)</i>
2015	“Progress in Polymer Science,” Liaw et al. (2012) [Resubmission of Ex. 1024].

2016	Response to BOE’s Motion for Summary Judgment in <i>Optronic Sciences LLC v. BOE Tech. Group Co., Ltd.</i> , No. 2:23-cv-00549-JRG, Dkt. 152 (E.D. Tex. Oct. 14, 2025).
2017	Pages from Petitioner’s Reply in IPR2025-00132, filed in <i>Optronic Sciences LLC v. BOE Tech. Group Co., Ltd.</i> , No. 2:23-cv-00549-JRG, Dkt. 152-3 (E.D. Tex. Oct. 14, 2025) (filed as MSJ “Exhibit F”).
2018	Deposition Transcript, Dr. Adam Fontecchio, September 30, 2025 (filed as MSJ “Exhibit H”).
2019	BOE_549_00015426, produced by BOE in <i>Optronic Sciences LLC v. BOE Tech. Group Co., Ltd.</i> , No. 2:23-cv-00549-JRG (filed as MSJ “Exhibit I”).
2020	“Advantage of ‘UPIA’” as obtained from UBA Corporation’s website https://www.ube.com/ube/en/contents/chemical/polyimide/upia/ on or about October 3, 2025 (filed as MSJ “Exhibit K”).
2021	BOE_549_00017305, produced by BOE in <i>Optronic Sciences LLC v. BOE Tech. Group Co., Ltd.</i> , No. 2:23-cv-00549-JRG (filed as MSJ “Exhibit L”).
2022	BOE_549_00006466, produced by BOE in <i>Optronic Sciences LLC v. BOE Tech. Group Co., Ltd.</i> , No. 2:23-cv-00549-JRG (filed as MSJ “Exhibit M”).
2023 ¹	Excerpts from the Rebuttal Report of Dr. Dean Neikirk regarding U.S. Patent Nos. 7,586,121 and 8,492,222, from <i>Optronic Sciences LLC v. BOE Tech. Group Co., Ltd.</i> , No. 2:23-cv-00549-JRG (filed as MSJ “Exhibit E”).
2024	Excerpts from Opening Expert Report of Dr. Dean Neikirk regarding U.S. Patent Nos. 7,586,121 and 8,492,222, from <i>Optronic Sciences LLC v. BOE Tech. Group Co., Ltd.</i> , No. 2:23-cv-00549-JRG (filed as MSJ “Exhibit G”).
2025	Excerpts from Dean Neikirk’s September 26, 2025, Deposition Transcript from <i>Optronic Sciences LLC v. BOE Tech. Group Co., Ltd.</i> , No. 2:23-cv-00549-JRG (filed as MSJ “Exhibit J”)

¹ The filings of Ex. 2023, Ex. 2024, and Ex. 2025 are pending the Board’s decision regarding Patent Owner’s opposed request for leave to file testimonial evidence.

In accordance with 37 C.F.R. § 42.14, Petitioner moves to seal Exhibits 2016, 2018, 2019, 2021, and 2022, filed herewith, and Exhibits 2023 (pending), 2024 (pending), and 2025 (pending), in accordance with the Protective Order and Patent Owner's Response to Petitioner's Submission of Supplemental Briefing that references the same. *See* Paper 46.

These documents were filed under seal in the corresponding District Court litigation by Patent Owner. They should not be public should not be public because they contain confidential information about the layers and materials in Petitioner BOE's products, and were labeled "Restricted Confidential – Source Code" or "Restricted Confidential – Attorneys' Eyes Only."

Date: November 5, 2025

Respectfully submitted,

/ Qi Tong /

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CERTIFICATE OF SERVICE (37 C.F.R. § 42.6(e)(1))

The undersigned hereby certifies that the above document was served on November 5, 2025, by filing this document through the Patent Trial and Appeal Board End to End system as well as delivering a copy via electronic mail upon the following attorneys of record for the Petitioner:

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