UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

BOE TECHNOLOGY GROUP CO., LTD.,

Petitioner,

v.

PANELTOUCH TECHNOLOGIES LLC,

Patent Owner.

Case IPR2025-01246
U.S. Patent No. 8,803,836

PATENT OWNER'S REPLY IN SUPPORT OF SUPPLEMENTAL BRIEF REGARDING BOE'S FAILURE TO DISCLOSE ALL REAL PARTIES IN INTEREST

PATENT OWNER'S EXHIBIT LIST

No.	Description
2001	Docket Navigator IPR Stay Statistics.
2002	Docket Navigator Judge Gilstrap Median Time-to-Trial Statistics.
2003	*Dabico Airport Solutions Inc. v. Axa Power Aps*, IPR2025-00408 (Paper 21).
2004	Director Squire's October 28, 2025 Memorandum.
2005	Excerpts from "Entity List," *Export Administration Regulations*, BUREAU OF INDUSTRY AND SECURITY, available at https://www.bis.gov/regulations/ear/744#supplement-4-744 (last accessed Nov. 5, 2025).
2006	*Letter to U.S. International Trade Commission*, U.S. HOUSE OF REPRESENTATIVES SELECT COMMITTEE ON THE CHINESE PARTY (dated December 18, 2024).
2007	BOE Technology Ground Co., LTD. Annual Report 2024 (Summary).
2008	BOE Technology Ground Co., LTD. Annual Report 2024, available for download at https://www.boe.com/en/investorRelations/regularCompanyAnnouncements (last visited Nov. 6, 2025).
2009	*Primer on Important Amendments to the Chinese Company Law*, AMERICAN BAR ASSOCIATION, https://www.americanbar.org/groups/franchising/resources/franchise-lawyer/2024-winter/primer-important-amendments-chinese-company-law/ (published Aug. 23, 2024).
2010	*Actual controllers with foreign residency rights and corporate tax avoidance: Evidence from private listed companies in China*, EMERGING MARKETS REVIEW VOL. 26, available at https://www.sciencedirect.com/science/article/abs/pii/S1566014125001207 (last accessed Nov. 5, 2025).
2011	*Legal Representative vs. Actual Controller: Who Really Runs a Chinese Company?*, CNBIZINSIGHT, available at https://cnbizinsight.com/legal-representative-vs-actual-controller-who-really-runs-a-chinese-company/ (last accessed Nov. 5, 2025).

No.	Description
2012	*Yangtze Memory Tech. Co. Ltd. v. Micron Tech. Inc.*, IPR2025-00098, IPR2025-00099, Paper 33 (Nov. 10, 2025).

BOE's response is misdirection and distraction. It argues that "Beijing Opto-Electronics Technology Co.," listed on the entity list, is unaffiliated with Petitioner. Paper 12 at 1–2.[1] But Petitioner simply ignores the House Letter that specifically addresses BOE the display manufacturer. Ex. 2006 at 1 ("…in order to protect U.S. national security interests, the [ITC] must … ban imports of **BOE's patent infringing displays**" (emphasis added)). Petitioner does not deny that the House Letter refers to it and cannot substantively rebut the Congressional findings. *See* Paper 12 at 2. The House Committee is unequivocal that BOE's IP theft poses significant national security risks. Ex. 2006.[2] The House Committee expressly found that "**the PRC has groomed BOE** as its national champion in the display industry." *Id.* at 1. Petitioner's attempt to hide its PRC connections is flatly contradicted by what Congress has already found. The Board should adopt Congress's finding that BOE qualifies as a Chinese military company, is a national security threat, and has not disclosed all RPIs. The Board should therefore deny institution.

[1] The address listed on the entity list are nearly identical to addresses listed on Petitioner's website. *See* https://www.boe.com/en/about/BOEGlobal.

[2] Ex. 2006 expressly refers to the "September 2024 letter to Secretary of Defense Lloyd Austin, which details our findings regarding the national security risk posed by BOE." The letter states that BOE is a "***Chinese military compan[y], and their operations in the [U.S.] represent a threat to …. national security.***" Available at https://chinaselectcommittee.house.gov/sites/evo-subsites/selectcommitteeontheccp.house.gov/files/evo-media-document/9.24.24%20DOD%20Letter%20re%20BOE%20Tianma_0.pdf.

Date: December 12, 2025

Respectfully submitted,

/*Jefferson Cummings*/

Jefferson Cummings (Reg. No. 81,926)
RUSS AUGUST & KABAT
12424 Wilshire Boulevard, 12th Floor
Los Angeles, CA 90025
(310) 826-7474
Attorney for Patent Owner

CERTIFICATE OF PAGE LIMIT

I certify that there are less than 3 pages, as authorized by the Director's December 11, 2025 email to the parties.

/*Jefferson Cummings*/
Jefferson Cummings (Reg. No. 81,926)

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

The undersigned hereby certifies that the above document was served on December 12, 2025, by filing this document through the P-TACTS system as well as delivering a copy via electronic mail upon the following attorneys of record for the Petitioner:

Richard F. Martinelli
RFMPTABDocket@orrick.com
Tyler S. Miller
PTABDocketT5X@orrick.com

Date: December 12, 2025 Respectfully submitted,

/*Jefferson Cummings*/
Jefferson Cummings (Reg. No. 81,926)
RUSS AUGUST & KABAT
12424 Wilshire Boulevard, 12th Floor
Los Angeles, CA 90025
(310) 826-7474
Attorney for Patent Owner