

**UNITED STATES INTERNATIONAL TRADE COMMISSION
WASHINGTON, D.C.**

In the Matter of

**CERTAIN ORGANIC LIGHT-
EMITTING DIODE DISPLAY
MODULES AND COMPONENTS
THEREOF**

Inv. No. 337-TA-1378

**THE PRIVATE PARTIES' JOINT MOTION TO TERMINATE
THE INVESTIGATION ON THE BASIS OF A SETTLEMENT AGREEMENT**

Complainant Samsung Display Co., Ltd. (“SDC”) and Respondents BOE Technology Group Co., Ltd., Mianyang BOE Optoelectronics Technology Co., Ltd., Ordos Yuansheng Optoelectronics Co., Ltd., Chengdu BOE Optoelectronics Technology Co., Ltd., Chongqing BOE Optoelectronics Technology Co., Ltd., Wuhan BOE Optoelectronics Technology Co., Ltd., Yunnan Invensight Optoelectronics Technology, Ltd. (f/k/a BMOT f/k/a Kunming BOE Display Technology), and BOE Technology America, Inc. (collectively, “BOE”) respectfully request that the above-captioned investigation be terminated in its entirety pursuant to 19 U.S.C. § 1337(c) and 19 C.F.R. § 210.21(b) in view of a finalized confidential Settlement Agreement (“Agreement”) between SDC and BOE. The Agreement resolves all issues in dispute in this investigation. The private parties understand that the Office of Unfair Import Investigations (“OUII”) will take a position on the motion to terminate after reviewing the moving papers.

The Agreement has been executed by SDC and BOE and is fully effective between them. The Agreement is attached hereto as **Exhibit 1**, and it contains Confidential Business Information within the meaning of 19 C.F.R. § 201.6. Accordingly, SDC and BOE request that the Agreement be treated as Confidential Business Information under the Protective Order governing this

[REDACTED]

investigation. A redacted, non-confidential version of the Agreement is attached hereto as **Exhibit 2** and will be filed with the public version of this Joint Motion to Terminate. The Agreement resolves all disputes between SDC and BOE in this investigation, and the Agreement reflects the entire and only agreement between SDC and BOE regarding the subject matter of this investigation. There are no other agreements, written or oral, express or implied, between SDC and BOE regarding the subject matter of this investigation.

In view of the Agreement, there no longer exists a basis upon which to continue this investigation. Furthermore, termination of this investigation in light of the Agreement poses no threat to the public interest, and it is instead in the interest of the public and administrative economy to grant the motion to terminate. Commission policy and the public interest generally favor settlements, which preserve resources for the Commission, the Staff, and the private parties. And termination based on a settlement agreement is routinely granted. *See, e.g., Certain Digital Cameras, Software, and Components Thereof*, Inv. No. 337-TA-1059, Comm’n Notice, at 3 (Mar. 8, 2019) (“Moreover, the public interest favors settlement to avoid needless litigation and to conserve public and private resources.”); *Certain LED Lighting Devices, LED Power Supplies, and Components Thereof*, Inv. No. 337-TA-1081, Order No. 42 at 2 (May 2, 2018) (“The public interest generally favors settlement to avoid needless litigation and to conserve public resources.”).

For the forgoing reasons, SDC and BOE respectfully request that the Commission terminate this investigation in its entirety pursuant to 19 U.S.C. § 1337(c) and 19 C.F.R. § 210.21(b) in view of the Agreement.

Dated: November 25, 2025

Respectfully submitted,

/s/ K. Kevin Chu
S. Alex Lasher

[REDACTED]

K. Kevin Chu
QUINN EMANUEL URQUHART & SULLIVAN, LLP
1300 I Street, NW, Suite 900
Washington, D.C. 20005
Tel.: (202) 538-8000

Sean S. Pak
James D. Judah
QUINN EMANUEL URQUHART & SULLIVAN, LLP
50 California Street, 22nd Floor
San Francisco, CA 94111
Tel.: (415) 875-6600

D. James Pak
QUINN EMANUEL URQUHART & SULLIVAN, LLP
865 S Figueroa St, 10th Floor
Los Angeles, CA 90017
Tel.: (213) 443-3000

David A. Nelson
Marc L. Kaplan
QUINN EMANUEL URQUHART & SULLIVAN, LLP
191 N. Wacker Drive, Suite 2700
Chicago, IL 60606
Tel.: (312) 705-7400

Counsel for Complainant Samsung Display Co., Ltd.

/s/ Bas de Blank
Bas de Blank, Esq.
ORRICK, HERRINGTON & SUTCLIFFE LLP
1000 Marsh Road
Menlo Park, CA 94025-1015
Tel: (650) 614-7400
Fax: (650) 614-7401

Robert S. Shwartz, Esq.
ORRICK, HERRINGTON & SUTCLIFFE LLP
405 Howard Street
San Francisco, CA 94105
Tel: (415) 773-5760
Fax: (415) 773-5759

Richard F. Martinelli, Esq.

[REDACTED]

Xiang Wang, Esq
ORRICK, HERRINGTON & SUTCLIFFE LLP
51 West 52nd Sreet
New York NY 10019
Tel: (212) 506-5000

Counsel for Respondents BOE Technology Group Co., Ltd., Mianyang BOE Optoelectronics Technology Co., Ltd., Ordos Yuansheng Optoelectronics Co., Ltd., Chengdu BOE Optoelectronics Technology Co., Ltd., Chongqing BOE Optoelectronics Technology Co., Ltd., Wuhan BOE Optoelectronics Technology Co., Ltd., Yunnan Invensight Optoelectronics Technology, Ltd. (f/k/a BMOT f/k/a Kunming BOE Display Technology), and BOE Technology America, Inc.