

**UNITED STATES PATENT AND TRADEMARK OFFICE**

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**BEFORE THE PATENT TRIAL AND APPEAL BOARD**

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BOE TECHNOLOGY GROUP CO., LTD.,  
Petitioner,

v.

PANELTOUCH TECHNOLOGIES LLC,  
Patent Owner.

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Case No. IPR2025-01267  
U.S. Patent No. 11,126,025

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**SUR-REPLY TO PATENT OWNER'S  
SUPPLEMENTAL BRIEF REGARDING REAL PARTIES IN INTEREST**

**LISTING OF PETITIONER’S EXHIBITS**

| <b>Exhibit</b> | <b>Description</b>                                                                                           |
|----------------|--------------------------------------------------------------------------------------------------------------|
| 1001           | U.S. Patent No. 11,126,025 (the “’025 patent”)                                                               |
| 1002           | Prosecution History of U.S. Patent No. 11,126,025                                                            |
| 1003           | Declaration of Richard A. Flasck, M.S. (“Flasck Decl.”)                                                      |
| 1004           | <i>Curriculum Vitae</i> of Richard A. Flasck, M.S. (“Flasck C.V.”)                                           |
| 1005           | U.S. Patent Application Publication No. 2016/0224155 A1 (“Kim”)                                              |
| 1006           | U.S. Patent Application Publication No. 2017/0192568 A1 (“Kim II”)                                           |
| 1007           | U.S. Patent Application Publication No. 2018/0113541 A1 (“Xie”)                                              |
| 1008           | U.S. Patent Application Publication No. 2019/0294273 A1 (“Yoshida”)                                          |
| 1009           | Japanese Patent Application No. 2018-058356 and Certified Translation (“Translation”)                        |
| 1010           | U.S. Patent No. 3,824,003                                                                                    |
| 1011           | Willem den Boer, <i>Active Matrix Liquid Crystal Displays: Fundamentals and Applications</i> (Elsevier 2005) |
| 1012           | U.S. Patent No. 4,582,395                                                                                    |
| 1013           | Excerpt from <i>Wiley Electrical and Electronics Engineering Dictionary</i> (2004)                           |
| 1014           | Redline comparing Claims 10 and 18 of U.S. Patent No. 11,126,025                                             |
| 1015           | U.S. Patent Application Publication No. 2016/0054627 A1                                                      |

| <b>Exhibit</b> | <b>Description</b>                                                                                                                                              |
|----------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1016           | Declaration of Will Melehani In Support of Petitioner's Motion for Admission <i>Pro Hac Vice</i>                                                                |
| 1017           | Assignment of '025 patent to Paneltouch                                                                                                                         |
| 1018           | District Court Complaint                                                                                                                                        |
| 1019           | Waiver of Service                                                                                                                                               |
| 1020           | <i>Intentionally Omitted</i>                                                                                                                                    |
| 1021           | Email between BOE and Paneltouch regarding Waiver of Service, dated July 23, 2025                                                                               |
| 1022           | Docket Control Order, <i>Netlist Inc. v. Samsung Elecs. Co., Ltd.</i> , No. 2:25-CV-00557-JRG, Dkt. No. 29 (E.D. Tex. July 25, 2025)                            |
| 1023           | Docket Control Order, <i>Resonant Sys., Inc. v. Nintendo Co., Ltd.</i> , No. 2:25-cv-00090-JRG, Dkt. No. 32 (E.D. Tex. May 30, 2025)                            |
| 1024           | Docket Sheet, <i>CLO Virtual Fashion Inc. v. Zhejiang Lingdi Digital Tech. Co., Ltd.</i> , No. 2:23-cv-00274-JRG-RSP (Printed October 24, 2025)                 |
| 1025           | Docket Control Order, <i>CLO Virtual Fashion Inc. v. Zhejiang Lingdi Digital Tech. Co., Ltd.</i> , No. 2:23-cv-00274-JRG-RSP, Dkt. 32 (E.D. Tex. Dec. 19, 2023) |
| 1026           | Docket Sheet, <i>Multimedia Techs. Pte. Ltd. v. LG Elecs. Inc.</i> , No. 2:22-cv-00494-JRG (Printed October 24, 2025)                                           |
| 1027           | Docket Control Order, <i>Multimedia Techs. Pte. Ltd. v. LG Elecs. Inc.</i> , No. 2:22-cv-00494-JRG, No. 2:23-cv-00274-JRG-RSP, Dkt. 20 (E.D. Tex. Feb. 7, 2024) |

| Exhibit | Description                                                                                                                                       |
|---------|---------------------------------------------------------------------------------------------------------------------------------------------------|
| 1028    | Docket Sheet, <i>Headwater Research LLC v. Samsung Electronics Co. Ltd.</i> , No. 2:23-cv-00103-JRG-RSP (Printed October 24, 2025)                |
| 1029    | Docket Control Order, <i>Headwater Research LLC v. Samsung Electronics Co. Ltd.</i> , No. 2:23-cv-00103-JRG-RSP, Dkt. 63 (E.D. Tex. Dec. 1, 2023) |
| 1030    | Docket Sheet, <i>General Access Solutions, Ltd. v. T-Mobile USA, Inc.</i> , No. 2:23-cv-00158-JRG (Printed October 23, 2025)                      |
| 1031    | Docket Control Order, <i>General Access Solutions, Ltd. v. T-Mobile USA, Inc.</i> , No. 2:23-cv-00158-JRG, Dkt. 34 (E.D. Tex. Aug. 11, 2023)      |
| 1032    | Docket Sheet, <i>Video Solutions Pte. Ltd. v. Cisco Systems, Inc.</i> , No. 2:23-cv-00222-RWS-RSP (Printed October 24, 2025)                      |
| 1033    | Docket Control Order, <i>Video Solutions Pte. Ltd. v. Cisco Systems, Inc.</i> , No. 2:23-cv-00222-RWS-RSP, Dkt. 36 (E.D. Tex. Aug. 18, 2023)      |
| 1034    | Docket Sheet, <i>Daingean Technologies Ltd. v. T-Mobile USA, Inc.</i> , No. 2:23-cv-00347-JRG-RSP (Printed October 24, 2025)                      |
| 1035    | Docket Control Order, <i>Daingean Technologies Ltd. v. T-Mobile USA, Inc.</i> , No. 2:23-cv-00347-JRG-RSP, Dkt. 55 (E.D. Tex. Jan. 26, 2024)      |
| 1036    | Docket Sheet, <i>Ravikumar MD v. Memorial Health System of East Texas</i> , No. 2:23-cv-00560-JRG-RSP (Printed October 24, 2025)                  |
| 1037    | Docket Control Order, <i>Ravikumar MD v. Memorial Health System of East Texas</i> , No. 2:23-cv-00560-JRG-RSP, Dkt. 29 (E.D. Tex. Jan. 24, 2024)  |

| Exhibit | Description                                                                                                                                                                                                                                                                         |
|---------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1038    | Docket Sheet, <i>Collision Communications, Inc. v. Samsung Electronics Co. Ltd.</i> , No. 2:23-cv-00587-JRG (Printed October 24, 2025)                                                                                                                                              |
| 1039    | Docket Control Order, <i>Collision Communications, Inc. v. Samsung Electronics Co. Ltd.</i> , No. 2:23-cv-00587-JRG, Dkt. 36 (E.D. Tex. Apr. 17, 2024)                                                                                                                              |
| 1040    | Decision Referring the Petitions to the Board, <i>Geotab Inc. v. Fractus, S.A.</i> , IPR2025-01026, Paper 14 (P.T.A.B. Oct. 17, 2025)                                                                                                                                               |
| 1041    | Decision Referring the Petitions to the Board, <i>Apple Inc. v. Apex Beam Technologies LLC</i> , IPR2025-00896, Paper 10 (P.T.A.B. Sept. 3, 2025)                                                                                                                                   |
| 1042    | January 2024 IDS in the prosecution history of U.S. Patent No. 12,436,639                                                                                                                                                                                                           |
| 1043    | Declaration of Yongqi Zhang                                                                                                                                                                                                                                                         |
| 1044    | BOE Website – Values and Ideas ( <a href="https://www.boe.com/en/about/valuesAndIdeas">https://www.boe.com/en/about/valuesAndIdeas</a> )                                                                                                                                            |
| 1045    | BOE Website – About Us ( <a href="https://www.boe.com/en/about/index">https://www.boe.com/en/about/index</a> )                                                                                                                                                                      |
| 1046    | Beijing Opto Website ( <a href="http://en.oet.com.cn/">http://en.oet.com.cn/</a> )                                                                                                                                                                                                  |
| 1047    | Intel Press Release ( <a href="https://www.intc.com/news-events/press-releases/detail/1748/intel-and-trump-administration-reach-historic-agreement-to">https://www.intc.com/news-events/press-releases/detail/1748/intel-and-trump-administration-reach-historic-agreement-to</a> ) |
| 1048    | Micron Press Release ( <a href="https://www.micron.com/about/press/media-relations/press-kits/micron-celebrates-chips-act-grant-announcement">https://www.micron.com/about/press/media-relations/press-kits/micron-celebrates-chips-act-grant-announcement</a> )                    |
| 1049    | TRIPS Agreement – Article 3                                                                                                                                                                                                                                                         |

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| Exhibit | Description                                                                  |
|---------|------------------------------------------------------------------------------|
| 1050    | Paris Convention for the Protection of Industrial Property                   |
| 1051    | SDC and BOE Joint Motion to Terminate on the Basis of a Settlement Agreement |

BOE's RPI disclosure is correct. Like its opening brief, Paneltouch's reply brief has nothing to do with the RPI analysis. Paneltouch's lead assertion that BOE is Beijing Opto. is flatly wrong. BOE presented sworn, undisputed evidence that BOE is **not** on the entity list or related to the listed Beijing Opto. company in any way. Paper No. 14 (Opp.) at 1. This is evidence, not "argument" as Paneltouch weakly replies. Paneltouch's only response to this sworn evidence is a footnote incorrectly speculating about "address similarity." That is nonsense. How many high-tech businesses are in Silicon Valley? How many businesses on NYC's 6th Ave. share "similar addresses?"

Neither Paneltouch's opening brief, nor its reply, identify an alleged RPI that should have been listed on the Petition. Paneltouch's rearguing the significance of the letters of a House select committee (not a full Congressional finding) is not valid reply. In fact, the Executive Branch has **not** credited these letters and has **not** put BOE on any lists.

Most importantly, BOE already demonstrated that these issues are not relevant to the *Corning* RPI analysis, which considers specific IPR funding and decision-making authority. Paper No. 14 (Opp.) at 3. Paneltouch's reply does nothing to address this fatal error. The Director has already decided to reject Paneltouch's discretionary denial arguments. Paneltouch's serial, erroneous grasping at straws is no basis to reverse course.

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Date: December 15, 2025

Respectfully submitted,

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**CERTIFICATE OF PAGE COUNT**

The undersigned certifies that the foregoing paper complies with the page limit set forth in the Board's authorization of this sur-reply. The foregoing is not more than one page.

Dated: December 15, 2025

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**CERTIFICATE OF SERVICE**

The undersigned hereby confirms that the foregoing paper was served on  
December 15, 2025 via electronic mail upon the following counsel of record for  
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