

**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.

SAMSUNG DISPLAY CO., LTD.,  
Patent Owner.

Patent No. 10,541,279

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*Inter Partes* Review No. IPR2025-01476

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**JOINT MOTION TO TERMINATE PROCEEDING  
PURSUANT TO 35 U.S.C. § 317(A)**

**Petitioner's Updated Exhibit List**

| <b>No.</b> | <b>Exhibit</b>                                                                                                                    |
|------------|-----------------------------------------------------------------------------------------------------------------------------------|
| Ex-1001    | U.S. Patent No. 10,541,279 B2 (“the ’279 patent”)                                                                                 |
| Ex-1002    | File History of the ’279 patent                                                                                                   |
| Ex-1003    | Declaration of Dr. Darran Cairns                                                                                                  |
| Ex-1004    | Curriculum Vitae of Dr. Darran Cairns                                                                                             |
| Ex-1005    | Chinese Patent No. CN203759670U (“Chen”); filed March 17, 2014; issued and published August 6, 2014.                              |
| Ex-1006    | U.S. Patent Application Publication No. 2014/0333855 (“Park”); filed May 8, 2014; published Nov. 13, 2014.                        |
| Ex-1007    | U.S. Patent Application Publication No. 2012/0105343 (“Lee-343”); filed May 26, 2011; published May 3, 2012.                      |
| Ex-1008    | U.S. Patent Application Publication No. 2015/0049030 (“Her”); filed Feb. 25, 2014; published Feb. 19, 2015.                       |
| Ex-1009    | Chinese Application No. CN105320372A (“Hsieh”); filed Sept. 23, 2014; published Feb. 10, 2016.                                    |
| Ex-1010    | Japanese Patent No. JPH0646348B2 (“Kobayashi”); filed May 12, 1986, published June 15, 1994; prior art under at least §102(a)(1). |
| Ex-1011    | Complaint, <i>Samsung Display Co., Ltd. v. BOE Technology Group Co., Ltd.</i> , E.D. Texas, filed April 21, 2025                  |
| Ex-1012    | U.S. Publication No. 2012/0262389 (“Kida”); filed Mar. 15, 2012, published Oct. 18, 2012                                          |
| Ex-1013    | U.S. Patent No. 8,289,457 (“Hwang”); filed Dec. 10, 2010; issued Oct. 16, 2012                                                    |
| Ex-1014    | U.S. Publication No. 2013/0341651 (“Kim”); filed Dec. 5, 2012; published Dec. 26, 2013                                            |

| No.     | Exhibit                                                                                                                                                      |
|---------|--------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Ex-1015 | U.S. Patent No. 9,363,888 (“Hwang”); filed Mar. 28, 2012; issued June 7, 2016                                                                                |
| Ex-1016 | U.S. Patent No. 9,947,727 (“Lee”); filed Sep. 6, 2016; issued Apr. 17, 2018                                                                                  |
| Ex-1017 | M. Krithikaa, “Touch Screen Technology – A Review,” International Journal of Trend in Research and Development, Volume 3(1), ISSN: 2394-9333 (Jan-Feb. 2016) |
| Ex-1018 | Fawwaz T. Ulaby et al., “Circuit Analysis and Design” Michigan Publishing (2018)                                                                             |
| Ex-1019 | U.S. Publication No. 2014/0002385 (“Ka”); filed Jan. 11, 2013; published Jan. 2, 2014                                                                        |
| Ex-1020 | Li Du, “An Overview of Mobile Capacitive Touch Technologies Trends” (Dec. 2016)                                                                              |
| Ex-1021 | Todd O’Connor, “mTouch™ Projected Capacitive Touch Screen Sensing Theory of Operation – TB3064,” Microchip (2010)                                            |
| Ex-1022 | ATMEL “Touch Sensors – Design Guide” (Apr. 2009)                                                                                                             |
| Ex-1023 | U.S. Publication No. 2015/0021565 (“Min”); filed Dec. 16, 2013; published Jan. 22, 2015                                                                      |
| Ex-1024 | U.S. Publication No. 2015/0261370 (“Yoo”); filed Dec. 30, 2014; published Sep. 17, 2015                                                                      |
| Ex-1025 | U.S. Publication No. 2014/0145979 (“Lee-979”); filed Mar. 14, 2013; published May 29, 2014                                                                   |
| Ex-1026 | U.S. Publication No. 2010/0265193 (“Kung”); filed Jan. 20, 2010; published Oct. 21, 2010                                                                     |
| Ex-1027 | Japanese Patent No. 1984029441A (Mitsubishi); filed Aug. 10, 1982; published Febr. 16, 1984                                                                  |

| No.     | Exhibit                                                                                                                                                          |
|---------|------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Ex-1028 | Japanese Patent No. 627983B2 (Hitachi); filed May 30, 1986; published Apr. 13, 1994                                                                              |
| Ex-1029 | U.S. Publication No. 2013/0176070 (“Guard”); filed Jan. 11, 2012; published July 11, 2013                                                                        |
| Ex-1030 | U.S. Patent No. 6,008,868 (“Silverbrook”); filed Mar. 13, 1995; issued Dec. 28, 1999                                                                             |
| Ex-1031 | U.S. Publication No. 2014/0160374 (“Wang”); filed Dec. 6, 2013; published June 12, 2014                                                                          |
| Ex-1032 | U.S. Publication No. 2011/0294288 (“Lee”); filed Aug. 10, 2011; published Dec. 1, 2011                                                                           |
| Ex-1033 | Chinese Patent Application No. 1378276A, filed Mar. 27, 2002; published Nov. 6, 2002                                                                             |
| Ex-1034 | U.S. Publication No. 2014/0307181 (“Tang”); filed Apr. 2, 2014; published Oct. 16, 2014                                                                          |
| Ex-1035 | Geoff Walker, “A Review of Technologies for Sensing Contact Location on the Surface of a Display” Journal of the Society of Information Display (Sept. 21, 2012) |
| Ex-1036 | U.S. Publication No. 2012/0098762 (“Kim”); filed Mar. 15, 2011; published Apr. 26, 2012                                                                          |
| Ex-1037 | U.S. Publication No. 2015/0212537 (“Cok”); filed Jan. 29, 2014; published Jul. 30, 2015                                                                          |
| Ex-1038 | U.S. Publication No. 2011/0007011 (“Mozdzyń”); filed Jun. 26, 2010; published Jan. 13, 2011                                                                      |
| Ex-1039 | William S. Wong & Alberto Salleo, “Flexible Electronics: Materials and Applications” Springer (2009)                                                             |

| No.     | Exhibit                                                                                                                                                                                                           |
|---------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Ex-1040 | Bernard Geffroy, et al. “Review Organic light-emitting diode (OLED) technology: materials, devices and display technologies” 2006 Society of Chemical Industry. Polym Int 55:572–582 (2006), DOI: 10.1002/pi.1974 |
| Ex-1041 | U.S. Patent No. 9,911,943 (“Han”); filed Sep. 28, 2015; issued Mar. 6, 2018                                                                                                                                       |
| Ex-1042 | U.S. Patent No. 9,285,842 (“Yashiro”); filed Jul. 24, 2012; issued Mar. 15, 2016                                                                                                                                  |
| Ex-1043 | U.S. Publication No. 2016/0109998 (“Watanabe”); filed Oct. 13, 2015; published Apr. 21, 2016                                                                                                                      |
| Ex-1044 | U.S. Publication No. 2010/0110041 (“Jang”); filed Jan. 7, 2010; published May 6, 2010                                                                                                                             |
| Ex-1045 | U.S. Publication No. 2010/0097344 (“Verweg”); filed May 1, 2009; published April 22, 2010                                                                                                                         |
| Ex-1046 | U.S. Patent No. 8,970,508 (“An”); filed May 5, 2010; issued Mar. 3, 2015                                                                                                                                          |
| Ex-1047 | Michael D. Sangid et al., “The role of grain boundaries on fatigue crack initiation – An energy approach” International Journal of Plasticity (2010)                                                              |
| Ex-1048 | Walter D. Pilkey, “Peterson’s Stress Concentration Factors,” Wiley Second Edition (1997)                                                                                                                          |
| Ex-1049 | Michael B. Heaney, “Electrical Conductivity and Resistivity” Electrical Measurement, Signal Processing, and Displays, CRC Press, 7-1 (2003)                                                                       |
| Ex-1050 | William D. Callister, Jr. et al. “Materials Science and Engineering; An Introduction,” Wiley (2014)                                                                                                               |
| Ex-1051 | Iulian Rosu, “Impedance Matching,” QSL.net                                                                                                                                                                        |

| No.     | Exhibit                                                                                                                                                  |
|---------|----------------------------------------------------------------------------------------------------------------------------------------------------------|
| Ex-1052 | Catrysse, et al. “Nanopatterned Metallic Films for Use As Transparent Conductive Electrodes in Optoelectronic Devices,” American Chemical Society (2010) |
| Ex-1053 | U.S. Publication No. 2015/0029135 (“Han”); filed Oct. 28, 2013; published Jan. 29, 2015                                                                  |
| Ex-1054 | U.S. Publication No. 2013/0278513 (“Jang”); filed Aug. 14, 2012; published Oct. 24, 2013                                                                 |
| Ex-1055 | U.S. Publication No. 2015/0242029 (“Kim”); filed Jan. 28, 2015; published Aug. 27, 2015                                                                  |
| Ex-1056 | Japanese Publication No. 2138739 (Kawasaki Steel); filed April 20, 1989; published May 28, 1990                                                          |
| Ex-1057 | U.S. Patent No. 9,423,830 (“Wei”); filed Mar. 24, 2014; issued Aug. 23, 2016                                                                             |
| Ex-1058 | U.S. Publication No. 2011/0193793 (“An”); filed May 5, 2010; published Aug. 11, 2011                                                                     |
| Ex-1059 | U.S. Publication No. 2011/0291117 (“Kwack”); filed Mar. 21, 2011; published Dec. 1, 2011                                                                 |
| Ex-1060 | U.S. Publication No. US2012/0305981 (“Park”); filed Nov. 18, 2011; published Dec. 6, 2012                                                                |
| Ex-1061 | U.S. Publication No. 2014/0002666 (“Eden”); filed June. 25, 2013; published Jan. 2, 2014                                                                 |
| Ex-1062 | U.S. Publication No. US 2014/0117330 (“Cho”); filed Sept. 6, 2013; published May 1, 2014                                                                 |
| Ex-1063 | U.S. Patent No. 9,276,055 (“Son”); filed Aug. 31, 2014; issued Mar. 1, 2016                                                                              |

| No.     | Exhibit                                                                                |
|---------|----------------------------------------------------------------------------------------|
| Ex-1064 | U.S. Publication No. 2013/0133935 (“Hsu”); filed Nov. 20, 2012; published May 30, 2013 |
| Ex-1065 | Confidential Settlement Agreement                                                      |

Petitioner BOE Technology Group Co., Ltd. (“BOE”) and Patent Owner Samsung Display Co. Ltd. (“Samsung”) have reached a settlement as to all the disputes in this proceeding. Pursuant to 35 U.S.C. § 317(a) and 37 C.F.R. § 42.74, BOE and Samsung jointly move to terminate the present *inter partes* review proceeding. The Board authorized the filing of this motion in their email dated November 20, 2025. Pursuant to 35 U.S.C. § 317(b) and 37 C.F.R. § 42.74(c), and the Board’s authorization e-mail, a Joint Request that the Settlement Agreement Be Treated as Business Confidential Information is being filed concurrently, and the copy of the agreement (Ex. 1065) is being filed as Board and Parties Only.

## **I. STATEMENT OF FACTS**

Samsung Display Co. Ltd. filed a patent infringement lawsuit against BOE, alleging infringement of the ’279 patent. The lawsuit is captioned *Samsung Display Co. v. BOE Technology Group Co.*, No. 2:25-cv-00426-JRG (E.D. Tex.) and was before the United States District Court for the Eastern District of Texas. The parties have filed a stipulation to dismiss the district court action with prejudice.

BOE and Samsung have reached an agreement to resolve the Parties’ disputes at issue in this proceeding. Pursuant to 37 C.F.R. § 42.74(b), the Parties’ Settlement Agreement is in writing, and a true and correct copy is being filed as

EX1065. BOE and Samsung certify that there are no collateral agreements or understandings made in connection with, or in contemplation of, the termination of this IPR. There is no other litigation or proceeding involving the '279 patent between Petitioner and Patent Owner, and no litigation or proceeding between Petitioner and Patent Owner is contemplated in the foreseeable future in view of the Settlement Agreement.

## **II. RELIEF REQUESTED**

Termination of this *inter partes* review is respectfully requested, and the Parties submit that such termination is justified. “There are strong public policy reasons to favor settlement between the parties to a proceeding.” Consolidated Trial Practice Guide 86 (Nov. 2019). “The Board expects that a proceeding will terminate after the filing of a settlement agreement, unless the Board has already decided the merits of the proceeding.” *Id.* (citing 35 U.S.C. §§317(a)).

The Board should terminate this proceeding, as the Parties jointly request, for the following reasons:

*First*, BOE and Samsung have met the statutory requirement that they file a “joint request” to terminate before the Office “has decided the merits of the proceeding.” 35 U.S.C. § 317(a). Under section 317(a), an *inter partes* review shall be terminated upon such joint request “unless the Office has decided the

merits of the proceeding before the request for termination is filed.” There are no other preconditions of 35 U.S.C. § 317(a). At the time of this paper, the Board has not “decided the merits of the proceeding.”

*Second*, BOE and Samsung have reached a settlement as to all the disputes in this proceeding. A true copy of the Settlement Agreement is filed concurrently herewith as Board and Parties Only, along with a Joint Request that the Settlement Agreement Be Treated as Business Confidential Information. *See* Exhibit 1065. No other such agreements, written or oral, exist between or among the Parties relating to this proceeding. The Settlement Agreement thus satisfies the requirements of 35 U.S.C. § 317(b).

*Third*, termination would save significant further expenditure of resources by the Parties. Termination as requested would also further the purpose of *inter partes* review proceedings to provide an efficient and less costly alternative forum for patent disputes. Further, maintaining the proceeding would discourage future settlements, as patent owners in similar situations would have a strong disincentive to settle if they perceived that an *inter partes* review would continue regardless of a settlement.

### III. CONCLUSION

For the foregoing reasons, Petitioner and Patent Owner respectfully request termination of this *inter partes* review.

As agreed upon by the parties, Petitioner files this joint motion on behalf of the parties.

Dated: November 25, 2025

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Respectfully submitted,

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**Certificate of Service (37 C.F.R. § 42.6(e)(4))**

I hereby certify that the attached JOINT MOTION TO TERMINATE PROCEEDING PURSUANT TO 35 U.S.C. § 317(a) was served as of the below date via email (by agreement) to the following counsel of record for Patent Owner:

Scott C. Weidenfeller - sweidenfeller@cov.com  
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Dated: November 25, 2025

By / *Kate Rose* / \_\_\_\_\_  
Kate Rose  
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