

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

BOE TECHNOLOGY GROUP CO., LTD.,
Petitioner,

v.

SAMSUNG DISPLAY CO., LTD.,
Patent Owner.

Patent No. 11,500,496

Inter Partes Review No. IPR2025-01477

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

Petitioner’s Updated Exhibit List

No.	Exhibit
Ex-1001	U.S. Patent No. 11,500,496 B2
Ex-1002	File History of the ’496 patent
Ex-1003	Declaration of Darran Cairns, Ph.D.
Ex-1004	Curriculum Vitae of Darran Cairns
Ex-1005	U.S. Publication No. 2015/0049030 (“Her”)
Ex-1006	U.S. Publication No. 2014/0145979 (“Lee-979”)
Ex-1007	U.S. Patent No. 6,867,549 (“Cok”)
Ex-1008	U.S. Publication No. 2014/0117330 (“Cho”)
Ex-1009	U.S. Publication No. 2014/0002385 (“Ka”)
Ex-1010	U.S. Publication No. 2013/0341651 (“Kim”)
Ex-1011	Jae-Hoon Lee, et al., P-12: A New a-Si:H TFT Pixel Design Compensating Threshold Voltage Degradation of TFT and OLED, SID Symposium Digest of Technical Papers, vol. 35, no. 1, pp. 264–67, 2004 (“Lee-P12”)
Ex-1012	Chinese App. No. CN105320372A (“Hsieh”)
Ex-1013	Complaint <i>Samsung Display Co., Ltd. v. BOE Technology Group Co., Ltd. et al.</i> ; USDC, E.D. Texas, filed April 21, 2025
Ex-1014	U.S. Patent No. 8,289,457
Ex-1015	U.S. Publication No. 2012/0262389
Ex-1016	U.S. Patent No. 9,947,727
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)

No.	Exhibit
Ex-1018	Fawwaz T. Ulaby et al., “Circuit Analysis and Design” Michigan Publishing (2018)
Ex-1019	U.S. Publication No. 2013/0278513
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
Ex-1024	U.S. Publication No. 2015/0261370
Ex-1025	Japanese Patent No. 646348B2 (“Kobayashi”)
Ex-1026	Japanese Patent No. 1984029441A
Ex-1027	Japanese Patent No. 627983B2
Ex-1028	Japanese Publication No. 2138739
Ex-1029	U.S. Patent No. 9,423,830
Ex-1030	U.S. Publication No. 2011/0193793
Ex-1031	SID Website, “P-12: A New a-Si:H TFT Pixel Design Compensating Threshold Voltage Degradation of TFT and OLED,” https://sid.onlinelibrary.wiley.com/doi/10.1889/1.1830965
Ex-1032	Tai et al. “A New Pixel Circuit for Driving Organic Light-Emitting Diode With Low Temperature Polycrystalline Silicon Thin-Film Transistors”; IEEE/OSA Journal Of Display Technology, Vol. 1, No. 1, September 2005

No.	Exhibit
Ex-1033	Chen et al. “New pixel circuits for driving active matrix organic light emitting diodes” B.-T. Chen et al. / Solid-State Electronics 50 (2006) 272–275
Ex-1034	U.S. Patent No. 9,276,055
Ex-1035	U.S. Patent No. 9,029,846
Ex-1036	U.S. Publication No. 2013/0194205
Ex-1037	U.S. Publication No. 2015/0212537
Ex-1038	U.S. Publication No. 2011/0007011
Ex-1039	William S. Wong & Alberto Salleo, “Flexible Electronics: Materials and Applications” Springer (2009)
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
Ex-1042	U.S. Patent No. 9,285,842
Ex-1043	U.S. Publication No. 2016/0109998
Ex-1044	U.S. Publication No. 2004/0164668
Ex-1045	U.S. Patent No. 7,510,454
Ex-1046	U.S. Patent No. 8,970,508
Ex-1047	Michael D. Sangid et al., “The role of grain boundaries on fatigue crack initiation – An energy approach” International Journal of Plasticity (2010)

No.	Exhibit
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
Ex-1052	Catrysse, et al. “Nanopatterned Metallic Films for Use As Transparent Conductive Electrodes in Optoelectronic Devices,” American Chemical Society (2010)
Ex-1053	Askari Mohammad Bagher, “Comparison of LED and OLED” Scholars Journal of Engineering and Technology (SJET), 206 (2016)
Ex-1054	U.S. Publication No. 2016/0313837
Ex-1055	U.S. Patent No. 6,504,202
Ex-1056	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. 1056) 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 ’496 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

EX1056. 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 '496 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 1056. 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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SDC-BOE-IPR@cov.com

Dated: November 25, 2025

By / *Kate Rose* / _____
Kate Rose
Senior Paralegal