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.

Case No.: IPR2025-01478

U.S. Patent No. 11,574,990

PETITIONER'S SOTERA STIPULATION

Petitioner BOE Technology Group Co. Ltd. stipulates that if and when the Board institutes *inter partes* review in this proceeding (IPR2025-01478), Petitioner and the defendants in the co-pending district court proceeding, *Samsung Display Co., Ltd., v. BOE Technology Group Co., Ltd., et al.*, No. 2:25-cv-00412 (E.D. Tex.), will not advance: against the claims challenged in IPR2025-01478 in the co-pending district court proceeding: (i) the specific grounds raised in IPR2025-01478, (ii) any other grounds that could have reasonably been raised before the PTAB in that instituted proceeding (i.e., any ground that could have reasonably been raised under §§ 102 or 103 on the basis of prior art patents or printed publications), or (iii) any ground based on a combination of system prior art and prior art patents or printed publications in (i).

Dated: October 10, 2025

Respectfully submitted,

/Babak Tehranchi/

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true copy of the foregoing PETITIONER'S SOTERA STIPULATION has been served on Patent Owner at the following address:

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Dated: October 10, 2025

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