

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. 11,574,991

Inter Partes Review No. IPR2025-01479

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

Petitioner’s Updated Exhibit List

No.	Exhibit
1001	U.S. Patent No. 11,574,991 (“’991 Patent” or “’991Pat.”)
1002	File History of the ’991 patent (“’991FH”)
1003	Declaration of Jerzy Kanicki, Ph.D.
1004	Curriculum Vitae of Jerzy Kanicki, Ph.D.
1005	U.S. Pat. Pub. No. 2012/0313100 (“Liu”)
1006	U.S. Pat. Pub. No. 2003/0089905 (“Udagawa”)
1007	Japanese Pat. Pub. No. 2003-167533 (“Nakayama”)
1008	U.S. Pat. Pub. No. 2008/0150846 (“Chung”)
1009	U.S. Pat. Pub. No. 2012/0001893 (“Jeong”)
1010	U.S. Pat. Pub. No. 2012/0199854 (“Noguchi-I”)
1011	Japanese Pat. Pub. No. 2008-008942 (“Murade”)
1012	U.S. Pat. Pub. No. 2012/0127220 (“Noguchi-II”)
1013	U.S. Pat. No. 7,626,199 (“Kim”)
1014	<i>Samsung Display Co. v. BOE Technology Group Co.</i> , No. 2:25-cv-00412-JRG (E.D. Tex.), Dkt. No. 1, Complaint
1015	Definition of “periphery”: The American Heritage Dictionary, 2d ed. (1991)
1016	Definition of “periphery”: Concise Oxford English Dictionary, 11th ed. (2009)
1017	K.C. Park, <i>Pixel Circuits for OLED Displays</i> in <i>Advanced Display Technology</i> , Series in Display Science and Technology, I. B. Kang et al. (eds.), Springer Nature Singapore Pte Ltd. 2021 (“Park”)

No.	Exhibit
1018	R. M. A. Dawson et al., <i>Design of an Improved Pixel for a Polysilicon Active-Matrix Organic LED Display</i> in 1998 SID Symp. Digest of Tech Papers, 1998 (“Dawson”)
1019	S. M. Choi et al., <i>A Self-Compensated Voltage Programming Pixel Structure for Active-Matrix Organic Light-Emitting Diodes</i> in Proceedings of International Display Workshops (IDW), pp. 535-538, 2003 (“Choi”)
1020	A. Bernanose, <i>Electroluminescence of Organic Compounds</i> in British Journal of Applied Physics 6, pp. S54-S56, 1955 (“Bernanose”)
1021	H. Kallmann et al., <i>Bulk Conductivity in Organic Crystals</i> in Nature 4718, pp. 31-33, 1960 (“Kallmann”)
1022	M. Pope, Autoionization in Anthracene in The Journal of Chemical Physics 47, 2197–2198, 1967 (“Pope”)
1023	M. Sano et al., Electroluminescence and Band Gap in Anthracene in The Journal of Chemical Physics 43, 2920–2921, 1965 (“Sano”)
1024	P.S. Vincett et al., <i>Electrical Conduction and Low Voltage Blue Electroluminescence in Vacuum-Deposited Organic Films</i> in Thin Solid Films 94, 171-183, 1982 (“Vincett”)
1025	C.W. Tang and S.A. VanSlyke, <i>Organic Electroluminescent Diodes</i> in Applied Physics Letters 51, 913-915, 1987 (“Tang”)
1026	J.H. Burroughes et al., <i>Light-Emitting Diodes Based on Conjugated Polymers</i> in Nature 347, 539-541, 1990 (“Burroughes”)
1027	M.A. Baldo et al., <i>Highly Efficient Phosphorescent Emission from Organic Electroluminescent Devices</i> in Nature 395, 151-154, 1998 (“Baldo”)
1028	U.S. Pat. Pub. No. 2003/0129790 (“Yamazaki”)

No.	Exhibit
1029	Min et al., <i>Electrical Characteristics of New LDD Poly-Si TFT Structure Tolerant to Process Misalignment</i> in IEEE Electron Device Letters, 20(7), 1999 (“Min”)
1030	Lee et al., <i>Asymmetric Electrical Properties of Fork a-Si:H Thin-Film Transistor and Its Application to Flat Panel Displays</i> in Journal of Applied Physics, 105, 2009 (“Lee-2009”)
1031	Kim et al., <i>40 Inch FHD AM-OLED Display with IR Drop Compensation Pixel Circuit</i> in 2009 SID Symp. Digest of Tech Papers, 2009 (“Kim-2009”)
1032	Lee et al., <i>A Novel LTPS TFT Pixel Circuit for Compensating IR Drop of Large Area AMOLED Display</i> in The Electrochemical Society (ECS) Transactions, 50(8), pp. 269-275, 2012 (“Lee-2012”)
1033	N. H. E. Weste et al., <i>CMOS VLSI Design: A Circuits and Systems Perspective</i> , Fourth Edition, Addison-Wesley, 2011 (“Weste”)
1034	U.S. Pat. Pub. No. 2003/0141811 (“Park ’811”)
1035	U.S. Pat. No. 9,461,102 (“Ono”)
1036	U.S. Pat. Pub. No. 2012/0211750 (“Kakinuma”)
1037	U.S. Pat. Pub. No. 2006/0256502 (“Li”)
1038	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. 1038) 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 ’991 patent. The lawsuit is captioned *Samsung Display Co. v. BOE Technology Group Co.* No. 2:25-cv-00412-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

EX1038. 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 '991 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 1038. 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

/ Jessica Kaiser /

Jessica Kaiser
Reg. No. 58,937
Kaiser-ptab@perkinscoie.com
Perkins Coie LLP
1900 Sixteenth Street, Ste. 1400
Denver, CO 80202-5255

Attorneys for Petitioners

Respectfully submitted,

/ Scott C. Weidenfeller /

Scott C. Weidenfeller (Reg. No. 54,531)
sweidenfeller@cov.com
Covington & Burling LLP
One CityCenter, 850 Tenth Street NW
Washington, DC 20001

Attorneys for Patent Owner

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
David A. Garr - dgarr@cov.com
SDC-BOE-IPR@cov.com

Dated: November 25, 2025

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