

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

Tianma Microelectronics Co., Ltd.,

Petitioner,

v.

LG Display Co., Ltd.,

Patent Owner.

Patent No. 11,251,394 B2

Filing Date: June 22, 2020

Issue Date: February 15, 2022

Title: ORGANIC LIGHT EMITTING DISPLAY AND METHOD OF
FABRICATING THE SAME

Inter Partes Review No. IPR2025-01579

LITIGATION STIPULATION

If IPR is instituted in IPR2025-01579, unless institution is later vacated, reversed, or otherwise withdrawn, Tianma Microelectronics Co., Ltd. stipulates that it will not pursue in Civil Action No. 5:25-cv-00078, against the '394 patent, (i) the specific grounds asserted in IPR2025-01579, (ii) any other ground that was raised or could have been reasonably raised in an IPR (i.e., any ground that could be raised under §§ 102 or 103 on the basis of prior art patent or printed publications), (iii) any ground based on a combination of system prior art (i.e., prior art that is neither a patent or printed publication) and the references that form the basis of any ground raised in IPR2025-01579, or (iv) any ground that could be raised under §§ 102 or 103 on the basis of system art corresponding to a reference that forms the basis of any ground raised in IPR2025-01579. Thus, there will be no overlap between the issues raised in the Petition and the district court, and this IPR will serve as a “true alternative” to the district court proceeding.

Dated: December 3, 2025

Respectfully submitted,

/ Joshua L. Goldberg /

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CERTIFICATE OF SERVICE

The undersigned certifies that that a copy of the foregoing **Litigation Stipulation** was served electronically via email on December 3, 2025, in its entirety on the following:

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