

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

DECLARATION OF MINFU ZHANG

I, Minfu Zhang, hereby declare and state as follows:

1. I am an IP specialist of Tianma Microelectronics Co., Ltd. (“Tianma Microelectronics”), the Petitioner in this IPR. In my role, I am responsible for the company’s licensing and litigation work. I submit this declaration to address certain issues relating to the cross-licensing negotiations between Tianma Microelectronics and LG Display Co., Ltd. (“LG” or “Patent Owner”).

2. This declaration is based on my personal knowledge, my review of certain documents, including emails between Tianma Microelectronics and LG, and communications with the head of Tianma’s Intellectual Property department.

3. Tianma Microelectronics and LG have been in negotiations since 2015 and have discussed cross-licenses relating to each party’s patent portfolios. Throughout the entire time, Tianma Microelectronics was committed to finding an acceptable business solution through negotiations and acted diligently in responding to and requesting information from LG towards this end. The parties held numerous meetings and had ongoing communications. This included discussing Tianma Microelectronics’ patent portfolio and LG’s infringement of Tianma Microelectronics’ patents.

4. On December 17, 2021, Tianma Microelectronics’ representative sent an email to LG’s representative with technical analysis materials to show reasoning

behind Tianma Microelectronics' belief that it did not infringe LG's patents. These technical analysis materials spanned 381 pages. The email also explained that LG's rebuttal materials and positions were unpersuasive to Tianma Microelectronics and that LG provided a long list of relevant Chinese patents that would take a while to review because LG failed to provide details on its infringement claims.

5. On December 21, 2021, Tianma Microelectronics' representative sent an email to LG's representative detailing specific reasons why it could not provide a counter offer at that time, including because (1) LG only provided a list of relevant CN patents, requiring Tianma Microelectronics to review each one in detail to understand LG's claims; and (2) LG's rebuttals did not provide sufficient detail as to why it disagrees with Tianma Microelectronics.

6. On February 24 2023, Tianma Microelectronics' representative sent an email to LG's representative providing a preliminary counteroffer and reasoning supporting the counteroffer. The email explained additional information LG should provide to help close the negotiation gap and achieve a deal. LG responded refusing to provide this information. The parties held additional meetings in 2023 without reaching a resolution.

7. On February 1, 2024, the parties held a meeting. LG asked whether Tianma Microelectronics had a new counteroffer and refused to provide a rebuttal to Petitioner's last offer.

8. In August of 2024, Tianma Microelectronics sent a letter to LG identifying nearly 100 of its Chinese patents and explaining that LG continued to infringe those patents. The letter also included an initial licensing offer. LG's representative responded to the letter asking whether the letter indicated Tianma Microelectronics' willingness to re-engage with cross-licensing negotiations and asked for specific product information so that LG could fully assess the situation. Tianma provided additional materials to LG in September of 2024 and LG did not provide a response to those materials. LG never informed Tianma that negotiations were terminated before filing a lawsuit.

9. Changes to the Tianma Microelectronics' negotiating representatives throughout the nearly 10-year licensing negotiations were due to routine business operations and were not a mechanism to cause any delay in negotiations. The need for the newly appointed representative to become familiar with prior discussions and the current status of negotiations was also reasonable and necessary for fruitful discussions and not to cause intentional delay.

Declaration of Minfu Zhang
U.S. Patent No. 11,251,394
IPR2025-01579

I declare that all statements made herein of my knowledge are true, that all statements made on information and belief are believed to be true, and that these statements were made with the knowledge that willful false statements and the like so made are punishable by fine or imprisonment, or both, under Section 1001 of Title 18 of the United States Code.

Executed on this 30th day of January in 2026.



Minfu Zhang