

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 GAOJUN HUANG

I, GaoJun Huang, hereby declare and state as follows:

1. I am Senior Patent Expert at the Intellectual Property Department (“IPD”) of Tianma Microelectronics Co., Ltd., the Petitioner in this IPR. I have been with Tianma’s IPD since 2016. I am responsible for patent risk assessment and overseeing U.S. patent litigations, including related proceedings like *inter partes* reviews (“IPRs”). In this role, I oversee the preparation and filing of this IPR challenging the ’394 patent. This declaration is based on my personal knowledge and discussions with employees in Tianma’s IPD that are knowledgeable about the finances for this IPR.

2. Tianma Microelectronics provided all of the funding for fees associated with the preparation and filing of this IPR.

3. I understand that LG Display Co., Ltd. (“LG” or “Patent Owner”) has alleged that Xiamen Tianma Micro-electronics Co., Ltd. (“Xiamen Tianma”), NLT Technologies, Ltd (“NLT”),¹ Xiamen Jincai Industry Development Co., Ltd., AVIC Innovation Holding Limited (“AVIC Innovation”), CATIC Shenzhen Holdings Limited (“CATIC”), and Aviation Industry Corporation of China (“AVIC”) should have been named as real parties of interest in this IPR.

¹ NLT was renamed to Tianma Japan, Ltd. (“Tianma Japan”) in 2017.

4. None of these entities funded, controlled, or directed this IPR, or had the ability to control this IPR. For example, none of these companies had any authority over IPR decisions, participation in strategy or filings, role in expert selection or management. Further, none of these companies' employees had any involvement in this IPR. Outside counsel that prepared and filed this IPR never discussed this IPR with any employees from these six entities.

5. NLT (now Tianma Japan) did conduct some prior art searching and analysis for the patents asserted in the litigation filed by LG and related to this IPR. But they did not do anything more than a commercial prior art search company would do and did not have any participation in this IPR.

Declaration of GaoJun Huang
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.

GaoJun Huang
GaoJun Huang