

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

LG DISPLAY CO., LTD.
LG DISPLAY AMERICA, INC.
Petitioner,

v.

NLT TECHNOLOGIES, LTD.
Patent Owner.

PGR2026-00028
Patent 12,293,691

JOINT MOTION TO TERMINATE

LIST OF EXHIBITS

EX1001	U.S. Patent No. 12,293,691 (“the ’691 patent”)
EX1002	Excerpts from the Prosecution History of the ’691 patent (“the Prosecution History”)
EX1003	Declaration and Curriculum Vitae of Dr. Bretschneider
EX1004	Complaint, <i>Tianma Microelectronics Co., Ltd. et al v. LG Display Co., Ltd. et al.</i> , 1-25-cv-02021 (WDTX), filed December 9, 2025
EX1005	U.S. Patent Application Publication No. 2015/0207094 to Hwang (“Hwang”)
EX1006	U.S. Patent Application Publication No. 2014/0292622 to Lee (“Lee”)
EX1007	U.S. Patent Application Publication No. 2012/0056531 to Park et al., (“Park’531”)
EX1008	U.S. Patent Application Publication No. 2016/0225834 to Kim (“Kim’834”)
EX1009	U.S. Patent Application Publication No. 2016/0260792 to Kim (“Kim’792”)
EX1010	U.S. Patent Application Publication No. 2015/0129856 to Kim (“Kim’856”)
EX1011	U.S. Patent Application Publication No. 2015/0364526 to Peng (“Peng”)
EX1012	U.S. Patent Application Publication No. 2012/0307123 to Cok (“Cok’123”)
EX1013	U.S. Patent Application Publication No. 2012/0098415 to Song (“Song”)

EX1014	U.S. Patent Application Publication No. 2009/0121983 to Sung (“Sung”)
EX1015	U.S. Patent Application Publication No. 2004/0217694 to Cok (“Cok’694”)
EX1016	U.S. Patent Application Publication No. 2011/0291550 to Kim, et al. (“Kim’550”)
EX1017	U.S. Patent No. 7,623,141 to Brown Elliott et al. (“Elliott”)
EX1018	U.S. Patent No. 4,853,592 to Strathman (“Strathman”)
EX1019	U.S. Patent No. 7,948,170 to Striakhilev et al. (“Striakhilev”)
EX1020	U.S. Patent No. 8,456,496 Credelle (“Credelle”)
EX1021	Sarma <i>et al.</i> , “Flat Panel Displays for Portable Systems,” 13 Journal of VLSI Signal Processing Systems 165-190, 1996 (“Sarma”)
EX1022	Fang, <i>et al.</i> , “Increasing image resolution on portable displays by subpixel rendering – a systematic overview,” APSIPA Transactions on Signal and Information Processing, vol. 1, p. E1, 2012 (“Fang”)
EX1023	Petitioner’s Stipulation
EX1024	Settlement Agreement

I. RELIEF REQUESTED

Pursuant to 35 U.S.C. § 317(a) and 37 C.F.R. §§ 42.71 and 42.74, and the Board’s authorization email of May 7, 2026, Petitioner LG Display Co., Ltd. (“Petitioner”) and Patent Owner Tianma Microelectronics Co., Ltd.¹ (“Patent Owner”) jointly move to terminate PGR2026-00028 (“the Present PGR Proceeding”) in its entirety.

II. BACKGROUND

(a) Status of the Present IPR Proceeding

The Present PGR Proceeding was initiated by the filing of a Petition for *Post Grant* Review of U.S. Patent No. 12,293,691 (“the ’691 Patent”) on February 6, 2026. The Board accorded a filing date to the Petition on February 17, 2026, and the deadline for a decision on institution is still months away.

(b) Related Matters

The ’691 Patent is the subject of civil action *Tianma Microelectronics Co., Ltd. et al v. LG Display Co., Ltd. et al.*, 1-25-cv-02021 (WDTX), filed December 9,

¹ The owner of the challenged patent is Tianma Microelectronics Co., Ltd. Tianma Japan, Ltd., formerly known as NLT Technologies, Ltd., transferred the challenged patent to Tianma Microelectronics Co., Ltd., as reflected in the U.S. Patent and Trademark Office’s Assignment Records at Reel/Frame 55946/0252.

2025. Petitioner is not aware of any prior disclaimers, reexamination certificates, or PGR petitions addressing the '691 Patent.

(c) Filing of Litigation Agreement, and Certification of No Collateral Agreements or Understandings

Petitioner and Patent Owner entered into an agreement that was fully executed on April 27, 2026, which settled the parties' disputes involving the Asserted Patent. The parties are concurrently filing a true copy of the settlement agreement as Exhibit 1024, along with a Joint Request to Treat Settlement Agreement as Business Confidential Information under 37 C.F.R. § 42.74(c).

Petitioner and Patent Owner certify that no collateral agreements or understandings exist in connection with, or in contemplation of, dismissal and termination of the Present PGR Proceeding beyond the settlement agreement filed as Exhibit 1024.

(d) IV. GOOD CAUSE JUSTIFIES TERMINATION OF THE PRESENT IPR PROCEEDING

The Board has recognized that termination of pre-institution PTAB proceedings is available upon a showing of good cause. *See, e.g., Samsung Elec. Co. Ltd. v. Telefonaktiebolaget LM Ericsson*, IPR2021-00446, Paper 7, at 5 (PTAB August 3, 2021) (finding good cause for dismissal where “[t]he parties have settled their dispute, the proceedings are early in the preliminary stages, Patent Owner has not filed any preliminary responses, and the Board has not issued any decisions or

otherwise invested in the merits of these proceedings”); *Apple Inc. v. Pinn, Inc.*, IPR2021-00220 Paper 10 (PTAB Mar. 19, 2021); *Staylinked Corp. v. Ivanti, Inc.*, IPR2021-00022, Paper 10 (PTAB Feb. 4, 2021); *Intel Corp. v. Tela Innovations, Inc.*, IPR2019-01257, Paper 16 (PTAB Jan. 2, 2020); *World Programming LTD. v. SAS Institute, Inc.*, IPR2019-01457 Paper 19 (PTAB Dec. 27, 2019).

In view of the agreement that settled the parties’ disputes involving the ’691 Patent, Petitioner and Patent Owner respectfully submit that termination of the Present PGR Proceeding is warranted to conserve resources of the Board, to conserve resources of the parties, and to promote a speedy and just resolution of the Present PGR Proceeding. The Board has recognized that “[t]here are strong public policy reasons to favor settlement between the parties to a proceeding,” and as such, the Board “expects” a proceeding to be terminated at the parties’ request “unless the Board has already decided the merits of the proceeding.” Consolidated Trial Practice Guide, November 2019, p. 86. Here, the merits of the Present PGR Proceeding have not been decided, let alone considered in any decision by the Board. Accordingly, good cause exists to terminate the Present PGR Proceeding in its entirety.

V. CONCLUSION

For the above reasons, Petitioner and Patent Owner jointly and respectfully request that the Board terminate the Present PGR Proceeding.

Dated: May 29, 2026

Respectfully submitted,

/Jeremy J. Monaldo/

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Counsel for Petitioner

/T. Vann Pearce, Jr./

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Orrick, Herrington & Sutcliffe LLP

Counsel for Patent Owner

CERTIFICATE OF SERVICE

Pursuant to 37 CFR § 42.6(e)(4), the undersigned certifies that on May 29, 2026, a complete and entire copy of this Petitioner's Motion to Terminate were provided by email to the Patent Owner by serving the correspondence address of record as follows:

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