

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

BOE TECHNOLOGY GROUP CO., LTD.,
Petitioner,

v.

PANELTOUCH TECHNOLOGIES LLC,
Patent Owner.

Case No. IPR2025-01245
U.S. Patent No. 9,250,758

**SUR-REPLY TO PATENT OWNER'S
SUPPLEMENTAL BRIEF REGARDING REAL PARTIES IN INTEREST**

LISTING OF PETITIONER’S EXHIBITS

Exhibit	Description
1001	U.S. Patent No. 9,250,758 (the “’758 patent”)
1002	Prosecution History of U.S. Patent No. 9,250,758
1003	Declaration of Dr. Vivek Subramanian
1004	U.S. Patent Publication No. 2008/0303798 A1 (“Nakamura”)
1005	U.S. Patent Publication No. 2008/0246741 A1 (“Hinata ’741”)
1006	Prosecution History of U.S. Patent No. 9,639,229 (excerpted)
1007	JP-A-2002-342014 to Takaya (“Takaya”)
1008	Prosecution History of U.S. Patent No. 8,803,836 (excerpted)
1009	U.S. Patent Publication No. 2009/0096763 A1 (“Hinata ’763”)
1010	3/22/2024 Assignment of ’758 Patent to Paneltouch
1011	District Court Complaint
1012	Waiver of Service
1013	Declaration of Yongqi Zhang
1014	BOE Website – Values and Ideas (https://www.boe.com/en/about/valuesAndIdeas)
1015	BOE Website – About Us (https://www.boe.com/en/about/index)
1016	Beijing Opto Website (http://en.oet.com.cn/)
1017	Intel Press Release (https://www.intc.com/news-events/press-releases/detail/1748/intel-and-trump-administration-reach-historic-agreement-to)

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Exhibit	Description
1018	Micron Press Release (https://www.micron.com/about/press/media-relations/press-kits/micron-celebrates-chips-act-grant-announcement)
1019	TRIPS Agreement – Article 3
1020	Paris Convention for the Protection of Industrial Property
1021	SDC and BOE Joint Motion to Terminate on the Basis of a Settlement Agreement

BOE's RPI disclosure is correct. Like its opening brief, Paneltouch's reply brief has nothing to do with the RPI analysis. Paneltouch's lead assertion that BOE is Beijing Opto. is flatly wrong. BOE presented sworn, undisputed evidence that BOE is *not* on the entity list or related to the listed Beijing Opto. company in any way. Paper No. 12 (Opp.) at 1. This is evidence, not "argument" as Paneltouch weakly replies. Paneltouch's only response to this sworn evidence is a footnote incorrectly speculating about "address similarity." That is nonsense. How many high-tech businesses are in Silicon Valley? How many businesses on NYC's 6th Ave. share "similar addresses?"

Neither Paneltouch's opening brief, nor its reply, identify an alleged RPI that should have been listed on the Petition. Paneltouch's rearguing the significance of the letters of a House select committee (not a full Congressional finding) is not valid reply. In fact, the Executive Branch has *not* credited these letters and has *not* put BOE on any lists.

Most importantly, BOE already demonstrated that these issues are not relevant to the *Corning* RPI analysis, which considers specific IPR funding and decision-making authority. Paper No. 12 (Opp.) at 3. Paneltouch's reply does nothing to address this fatal error. The Director has already decided to reject Paneltouch's discretionary denial arguments. Paneltouch's serial, erroneous grasping at straws is no basis to reverse course.

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Date: December 15, 2025

Respectfully submitted,

By: /Richard F. Martinelli/

Richard F. Martinelli (Reg. No. 52,003)

Orrick, Herrington & Sutcliffe LLP

51 West 52nd Street

New York, NY 10019-6142

Telephone: (212) 506-3702

RFMPTABDocket@orrick.com

Counsel for Petitioner

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CERTIFICATE OF PAGE COUNT

The undersigned certifies that the foregoing paper complies with the page limit set forth in the Board's authorization of this sur-reply. The foregoing is not more than one page.

Dated: December 15, 2025

By: /Richard F. Martinelli/

Richard F. Martinelli (Reg. No. 52,003)
Orrick, Herrington & Sutcliffe LLP
51 West 52nd Street
New York, NY 10019-6142
Telephone: (212) 506-3702
RFMPTABDocket@orrick.com

Counsel for Petitioner

