

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

BOE TECHNOLOGY GROUP CO., LTD.,
Petitioner,

v.

SAMSUNG DISPLAY CO., LTD.,
Patent Owner.

Patent No. 11,626,066

Inter Partes Review No. IPR2025-01545

**JOINT MOTION TO TERMINATE PROCEEDING
PURSUANT TO 35 U.S.C. § 317(A)**

Petitioner's Updated Exhibit List

Exhibit Description	Exhibit #
U.S. Patent No. 11,626,066 to Lee	EX1001
Declaration of Thomas Credelle	EX1002
Prosecution history of U.S. Patent No. 11,626,066	EX1003
U.S. Patent No. 6,867,549 to Cok et al.	EX1004
U.S. Patent Pub. No. 2009/0033598 to Suh	EX1005
U.S. Patent No. 7,492,379 to Credelle et al.	EX1006
U.S. Patent Pub. No. 2004/0051724 to Elliott et al.	EX1007
K. Nishimura et al., "New Green and Red Phosphorescent Host Materials for Highly-efficient and Long-lifetime OLEDs," <i>SID Digest</i> (2009)	EX1008
A. Lääperi et al., "OLED Lifetime Issues in Mobile Phone Industry," <i>SID Digest</i> (2007)	EX1009
T. Tsujimura, <i>OLED Display</i> (2012) (excerpts from chapter 4)	EX1010
U.S. Patent Pub. No. 2003/0128225 to Credelle et al.	EX1011
U.S. Patent No. 11,626,067 to Lee	EX1012
U.S. Patent No. 7,215,347 to Phan	EX1013
U.S. Patent Pub. No. 2014/0191202 to Shim et al.	EX1014
Family Tree for U.S. Patent No. 11,626,066 to Lee	EX1015
U.S. Patent No. 10,832,616 to Lee	EX1016

Exhibit Description	Exhibit #
U.S. Patent No. 9,818,803 to Lee	EX1017
<i>Mianyang BOE Optoelectronics Tech. Co. Ltd., et al. v. Samsung Display Co., LTD.</i> , IPR2023-00987, Final Written Decision (Paper 46)	EX1018
U.S. Patent No. 10,854,683 to Lee	EX1019
<i>Mianyang BOE Optoelectronics Tech. Co. Ltd., et al. v. Samsung Display Co., LTD.</i> , IPR2023-00988, Final Written Decision (Paper 44)	EX1020
U.S. Patent No. 11,594,578 to Lee	EX1021
<i>Mianyang BOE Optoelectronics Tech. Co. Ltd., et al. v. Samsung Display Co., LTD.</i> , IPR2023-01075, Final Written Decision (Paper 46)	EX1022
K. Nishimura et al., “New Green and Red Phosphorescent Host Materials for Highly-efficient and Long-lifetime OLEDs,” <i>SID Digest</i> (2009) (Linda Hall Library Version)	EX1023
A. Lääperi et al., “OLED Lifetime Issues in Mobile Phone Industry,” <i>SID Digest</i> (2007) (Linda Hall Library Version)	EX1024
T. Tsujimura, <i>OLED Display</i> (2012) (excerpts) (University of Washington Library version)	EX1025
Declaration of Catherine Vassilkova authenticating EX1023, EX1024, and EX1025	EX1026
Prosecution history of U.S. Patent No. 10,832,616	EX1027
Comparison of U.S. Patent Pub. No. 2003/0128179 to U.S. Patent No. 7,492,379	EX1028
U.S. Patent No. 7,274,383 to Elliot	EX1029

Exhibit Description	Exhibit #
U.S. Patent Pub. No. 2003/0128179 to Credelle	EX1030
I. Vogels, “The Visibility of a Local Deviation in Luminance and White-Point of a Display,” <i>SID Symp. Of Tech Papers</i> (2003).	EX1031
U.S. Patent Pub. No. 2008/0001525 to Chao et al.	EX1032
U.S. Patent No. 7,091,986 to Phan	EX1033
U.S. Patent Pub. No. 2011/0198598 to Kim et al.	EX1034
U.S. Patent Pub. No. 2007/0096637 to Kim	EX1035
U.S. Patent Pub. No. 2010/0033084 to Ko et al.	EX1036
U.S. Patent Pub. No. 2008/0128686 to Kwon	EX1037
U.S. Patent Pub. No. 2009/0194780 to Kwon	EX1038
U.S. Patent Pub No. 2011/0234550 to Hong et al.	EX1039
Settlement Agreement (Confidential)	EX1040 [NEW]

Petitioner BOE Technology Group Co., Ltd. (“BOE”) and Patent Owner Samsung Display Co. Ltd. (“Samsung”) have reached a settlement as to all the disputes in this proceeding. Pursuant to 35 U.S.C. § 317(a) and 37 C.F.R. § 42.74, BOE and Samsung jointly move to terminate the present *inter partes* review proceeding. The Board authorized the filing of this motion in their email dated November 20, 2025. Pursuant to 35 U.S.C. § 317(b) and 37 C.F.R. § 42.74(c), and the Board’s authorization e-mail, a Joint Request that the Settlement Agreement Be Treated as Business Confidential Information is being filed concurrently, and the copy of the agreement (EX1040) is being filed as Board and Parties Only.

I. STATEMENT OF FACTS

Samsung Display Co. Ltd. filed a patent infringement lawsuit against BOE, alleging infringement of the ’066 patent. The lawsuit is captioned *Samsung Display Co., Ltd., v. BOE Technology Group Co., Ltd., et al.*, No. 2:25-cv-00430 (E.D. Tex.) and was before the United States District Court for the Eastern District of Texas. The district court action has been dismissed with prejudice.

BOE and Samsung have reached an agreement to resolve the Parties’ disputes at issue in this proceeding. Pursuant to 37 C.F.R. § 42.74(b), the Parties’ Settlement Agreement is in writing, and a true and correct copy is being filed as EX1040. BOE and Samsung certify that there are no collateral agreements or understandings made in connection with, or in contemplation of, the termination of

this IPR. There is no other litigation or proceeding involving the '066 patent between Petitioner and Patent Owner, and no litigation or proceeding between Petitioner and Patent Owner is contemplated in the foreseeable future in view of the Settlement Agreement.

II. RELIEF REQUESTED

Termination of this *inter partes* review is respectfully requested, and the Parties submit that such termination is justified. “There are strong public policy reasons to favor settlement between the parties to a proceeding.” Consolidated Trial Practice Guide 86 (Nov. 2019). “The Board expects that a proceeding will terminate after the filing of a settlement agreement, unless the Board has already decided the merits of the proceeding.” *Id.* (citing 35 U.S.C. §§317(a)).

The Board should terminate this proceeding, as the Parties jointly request, for the following reasons:

First, BOE and Samsung have met the statutory requirement that they file a “joint request” to terminate before the Office “has decided the merits of the proceeding.” 35 U.S.C. § 317(a). Under section 317(a), an *inter partes* review shall be terminated upon such joint request “unless the Office has decided the merits of the proceeding before the request for termination is filed.” There are no other preconditions of 35 U.S.C. § 317(a). At the time of this paper, the Board has not “decided the merits of the proceeding.”

Second, BOE and Samsung have reached a settlement as to all the disputes in this proceeding. A true copy of the Settlement Agreement is filed concurrently herewith as Board and Parties Only, along with a Joint Request that the Settlement Agreement be Treated as Business Confidential Information. *See* EX1040. No other such agreements, written or oral, exist between or among the Parties relating to this proceeding. The Settlement Agreement thus satisfies the requirements of 35 U.S.C. § 317(b).

Third, termination would save significant further expenditure of resources by the Parties. Termination as requested would also further the purpose of *inter partes* review proceedings to provide an efficient and less costly alternative forum for patent disputes. Further, maintaining the proceeding would discourage future settlements, as patent owners in similar situations would have a strong disincentive to settle if they perceived that an *inter partes* review would continue regardless of a settlement.

III. CONCLUSION

For the foregoing reasons, Petitioner and Patent Owner respectfully request termination of this *inter partes* review.

As agreed upon by the parties, Petitioner files this joint motion on behalf of the parties.

IPR2025-01545
Patent No. 11,626,066

Dated: November 25, 2025

Respectfully submitted,

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Dated: November 25, 2025

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IPR2025-01545
Patent No. 11,626,066

Certificate of Service (37 C.F.R. § 42.6(e)(4))

I hereby certify that the attached JOINT MOTION TO TERMINATE PROCEEDING PURSUANT TO 35 U.S.C. § 317(a) was served as of the below date via email (by agreement) to the following counsel of record for Patent Owner:

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Dated: November 25, 2025

By /s/ Alex S. Yap
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