

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

BOE TECHNOLOGY GROUP CO., LTD.,
Petitioner,

v.

138 EAST LCD ADVANCEMENTS LIMITED,
Patent Owner.

Case No. IPR2024-00977
U.S. Patent No. 9,557,606

**PETITIONER'S REQUEST FOR REHEARING
UNDER 37 C.F.R. § 42.71**

Petitioner respectfully requests rehearing under 37 C.F.R. § 42.71(d)(2) of the Board’s denial of institution because, misled by Patent Owner’s red herring arguments, the Board incorrectly decided that the primary reference asserted in all five grounds, *Fujikawa* (Ex. 1005), does not disclose claim limitation 7[l]: “*wherein the first substrate includes a plurality of wiring lines that connect to the plurality of active elements, and the plurality of wiring lines extend onto the protruding region across the seal member without connecting to the dot conductive points.*”¹

With respect to claim limitation 7[l], the Petition said “[e]ach wiring line in *Fujikawa* comprises three line segments, i.e., data line 6a, image signal line 101d, and line 109. Decl. ¶ 122.” Pet., 49. The Board thus should have addressed whether this collection of line segments meets the claimed requirements for a line, namely that they “connect to the plurality of active elements” and “extend onto the protruding region across the seal member.” ’606 patent, claim 7 (limitation 7[l]). *Fujikawa*’s image signal lines 101d, which the Petition said are parts of the wiring lines, meet the claim limitations, i.e., they: **(1)** connect to the TFT 30 “active elements” (via sample hold circuits 101c and data lines 6a), and **(2)** extend onto a

¹ Patent Owner did not dispute the negative recitation, “without connecting to the dot conductive points,” in claim limitation 7[l]. See Paper No. 6, 22-25.

protruding region across sealing member 107 (both by themselves and via lines 109).
See Pet., 48-50 (citing Ex. 1005, Figs. 2, 4, ¶¶ [0007], [0046], [0054]-[0057]);
Ex. 1004, ¶¶ 121-122. Therefore, signal lines 101d meet the requirements.

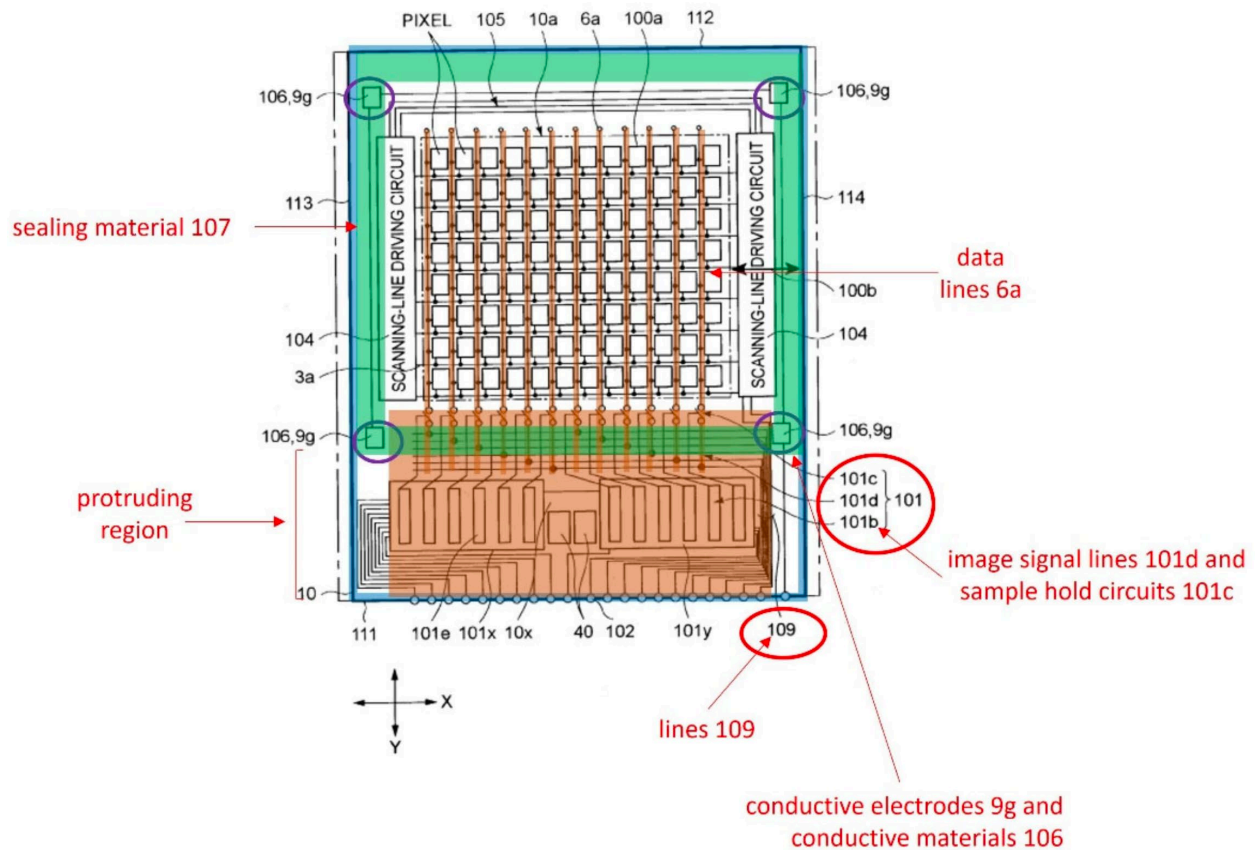


FIG.2

Pet., 50 (annotating *Fujikawa*, Fig. 2).

That is all that claim limitation 7[1] requires. Indeed, the Board *agreed* with Petitioner on these two propositions about the image signal lines 101d. Regarding the first proposition, the Board stated: “First, as Petitioner admits, data line 6a is not connected to image signal line 101d and line 109 *other than when sample hold circuit*

101c connects them due to shift register 101b outputting an enabling signal.” Paper No. 9, 11 (emphasis added). In other words, the Board found that when sample hold circuit 101c connects the image signal lines 101d to the data lines 6a, the image signal lines 101d *do connect* to the TFT 30 “active elements.”

Regarding the second proposition, the Board stated: “The figure also depicts *image signal lines 101d* with one end connected to the sample hold circuits and *the other end connected to lines 109*, with lines 109 being located on a protruding region *outside the ring of sealing material 107*.” *Id.* (emphasis added). With those two propositions established, the Board’s analysis should have ended because claim limitation 7[1] requires nothing more.

But Patent Owner advanced two red herring arguments that misled the Board. First, Patent Owner only analyzed the data lines 6a and scan lines 3a, arguing that they do not extend onto the protruding region, but ignored image signal lines 101d. Paper No. 6, 22-23. Patent Owner’s argument is misleading because data lines 6a and scan lines 3a are not the only lines that connect to the TFTs 30. The image signal lines 101d also connect to the TFTs 30, through the sample hold circuits 101c and data lines 6. But claim 7 merely requires that the wiring lines “connect to the plurality of active elements.” It by no means precludes an indirect connection of the “plurality of wiring lines” to the “plurality of active elements.” Indeed, the whole

purpose of having the image signal lines 101d is so that the data signals can reach the TFTs 30 (the “plurality of active elements”).

Second, Patent Owner misleadingly argued that the combination of a data line 6a, image signal line 101d, and line 109 does not comprise one line because of the intervening sample hold circuit 101c. *See* Paper No. 6, 24-25. But whether the collection of three line segments may or may not be one line is not the right inquiry. Signal lines 101d already meet the claim limitation, i.e., “extend onto the protruding region across the seal member.”

For the foregoing reasons, Petitioner respectfully submits that the Board misapprehended the requirements of claim limitation 7[1] and *Fujikawa*’s teachings that fully disclose all aspects of claim limitation 7[1]. Accordingly, Petitioner requests modification of the Board’s decision and institution of *inter partes* review.

Respectfully submitted,

Dated: January 15, 2025

By: /Joshua L. Goldberg/
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing PETITIONER'S REQUEST FOR REHEARING UNDER 37 C.F.R. § 42.71 was served on January 15, 2025, via email directed to counsel of record for Patent Owner at the following:

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