

**IN THE UNITED STATES PATENT TRIAL AND APPEAL BOARD**

In re *Inter Partes Review* of: )  
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U.S. Patent No. 7,956,978 ) TRIAL NO: IPR2013-00038  
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Issued: Jun. 7, 2011 )  
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Inventor: Hongyong Zhang )  
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Application No.: 12/165,783 )  
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Laboratory Co., Ltd. )  
)

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**DECLARATION OF MILTIADIS HATALIS, Ph.D., IN SUPPORT OF  
INNOLUX CORP'S OPPOSITION TO MOTION TO AMEND AND  
REPLY TO RESPONSE OF PATENT OWNER**

**I. Background and Qualifications**

(1) My name is Miltiadis Hatalis. I am currently a Professor at Lehigh University in the Department of Electrical and Computer Engineering. I have

studied, taught, and practiced in the relevant flat panel display technology for over 25 years.

(2) I received my Doctor of Philosophy (Ph.D.) degree in the field of Electrical and Computer Engineering from Carnegie Mellon University in 1987. The topic of my Ph.D. dissertation research was “Crystallization of Amorphous Silicon Films and its Application in Bipolar and Thin Film Transistors.” I received my Masters of Science (M.S.) degree in Electrical and Computer Engineering in 1984 from the State University of New York at Buffalo and my Bachelor of Science (B.S.) degree in Physics in 1982 from the Aristotle University of Thessaloniki in Greece.

(3) Upon receiving my Ph.D. degree, I joined the faculty of Lehigh University in the Department of Electrical and Computer Engineering as an Assistant Professor. I was promoted to the rank of Associate Professor with tenure in 1991 and to the rank of Professor in 1995. From 1987-1992, I served as Associate Director of Lehigh's “Microelectronics Research Laboratory.”

(4) In 1992, I founded and became Director of the “Display Research Laboratory,” which was the first academic laboratory in the United States dedicated to research and development of Thin Film Transistors (TFTs) for Active Matrix Liquid Crystal Displays (AMLCDs) and Active Matrix Organic Light Emitting Diode (AMOLEDs) displays. As Director of Lehigh's “Display Research

Laboratory,” I have raised over \$13 million through research contracts and grants to support the laboratory's research and development activities on thin film transistors and their application to flat panel displays. These contracts and grants were funded by the Defense Advanced Research Program Agency (DARPA), the Army Research Laboratory (ARL), the National Science Foundation (NSF), the National Aeronautics and Space Administration (NASA), the State of Pennsylvania, and a variety of industrial companies including IBM, Kodak, Sharp, Corning, Northrop Grumman, Qualcomm, Air Products, Alcoa and others.

(5) Since becoming a faculty member in 1987, I supervised the research of eighteen Ph.D. dissertations in the technical field of TFTs and, along with my graduate students, published over 150 technical publications in scientific journals and conferences in the field of thin film transistors and their applications in flat panel displays.<sup>1</sup> In addition to the aforementioned Ph.D. dissertations, I have also supervised a large number of graduate student master's theses and undergraduate research projects. I currently supervise the research of three PhD students and one post-doctoral research associate. I have taught a number of different undergraduate and graduate level courses in the Electrical and Computer Engineering department at the Lehigh University dealing with the physics,

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<sup>1</sup> More information on this subject can be found on my research group web pages: [www.ece.lehigh.edu/DRL](http://www.ece.lehigh.edu/DRL)

technology, and the design of solid-state devices and circuits, including “Semiconductor Material and Device Characterization,” “Introduction to VLSI Circuits” and “Introduction to VLSI Design.”

(6) As part of my research, I utilize much of the same equipment and many of the same fabrication processes that are relevant to U.S. Patent No. 7,956,978 (hereinafter referred to as the "'978 patent"), including: Plasma-Enhanced Chemical Vapor Deposition (PECVD) for intrinsic hydrogenated-amorphous silicon, silicon nitride and silicon dioxide films; sputter and e-beam deposition tools for aluminum, indium-tin-oxide, tantalum and other metallic thin films; photolithographic tools for spinning, exposure and developing photoresist; as well as plasma or wet etching tools for removing various thin film materials from the substrate. Furthermore, I also utilize several tools for the characterization of the materials and structures used in thin film transistors including: optical microscopes, Scanning Electron Microscopy (SEM), Transmission Electron Microscopy (TEM), and Atomic Force Microscopy (AFM). I also utilize a variety of electrical characterization techniques and instruments for testing the electrical performance of completed TFT circuits and flat panel displays.

(7) As part of my research, I pioneered a technique for crystallizing amorphous silicon. The technique I pioneered has been used in the manufacture of small polysilicon TFT AMLCDs for projection displays. My research group in

collaboration with industrial laboratories has pioneered the use of polysilicon TFTs in AMOLED displays; such displays are currently in production for a variety of smart phones. In addition, many industrial and academic laboratories have recently initiated R&D activities related to the fabrication of polysilicon thin film transistors on flexible metal foil substrates and their application to flexible displays. Such research flows from the accomplishments of my research group in this technical field.

(8) My industrial experience includes work at the XEROX Palo Alto Research Laboratory and various consulting projects with flat panel display companies as well as companies producing equipment for the manufacture of flat panel displays. All of these projects were related to the thin film transistors and their application to flat panel displays.

(9) I am a member of several professional organizations including the Society for Information Display (SID), and the Electron Device Society of the Institute of Electrical and Electronics Engineers (IEEE). I have also been the chair or co-chair at numerous national and international conferences/symposiums including several SID sponsored Workshops on Active Matrix Liquid Crystal Displays and a Materials Research Society Symposium on Flat Panel Displays. I have co-authored two book chapters, one dealing with the "Polysilicon TFT Technology" and another on application of "Polysilicon TFTs in AMOLED

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