SEL EXHIBIT NO. 2025

INNOLUX CORP. v. PATENT OF SEMICONDUCTOR ENERGY LABORATORY CO., LTD.

IPR2013-00066

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

INNOLUX CORPORATION
Petitioner

v.

PATENT OF SEMICONDUCTOR ENERGY LABORATORY CO., LTD.
Patent Owner

CASE IPR2013-00066
PATENT 7,876,413

SUPPLEMENTAL DECLARATION OF DR. MICHAEL J. ESCUTI

I, Michael J. Escuti, do hereby declare and state that all statements made herein are based on my own personal knowledge and that all statements made on information and belief are believed to be true. I further do hereby declare and state that these statements are made with the knowledge that willful false statements are punishable by fine or imprisonment or both under 18 U.S.C. § 1001.

Dated: 25 Sept 13

Michael J. Escuti

I. INTRODUCTION

1. I have been retained by Semiconductor Energy Laboratory Co., Ltd. in this proceeding as an expert in the relevant art.

2. On July 24, 2013, I provided a declaration ("Initial Declaration") (Ex. 2012) regarding U.S. Patent No. 7,876,413 (the "'413 patent") (Ex. 1001). In my Initial Declaration, paragraphs 5, 9, 11, and 12, I demonstrate that I have detailed knowledge of thin-film-transistor ("TFT")/liquid crystal display ("LCD") technology, design, and fabrication, which is the technology relevant to the '413 patent. Additionally, paragraph 49 demonstrates my detailed knowledge of sealants used in LCDs, which is a key element of the '413 claims.

3. During my deposition, I testified that I had detailed knowledge of LCD devices. Exhibit 2026, Escuti '204 Dep., at 90:3-9. I demonstrated my detailed knowledge of sealants. *Id.* at 144:17-22. I also testified that I had detailed knowledge of TFT/LCD technology, design, and fabrication. Exhibit 2027, Escuti '413 Dep., at 14:4-17, 16:5-11, 24:15-24, 39:1-11.

4. Below I provide additional evidence to demonstrate my qualifications as an expert in this proceeding.

A. Supplemental Background And Qualifications

5. The background and qualifications set forth in my Initial Declaration are incorporated by reference herein.

6. In my Initial Declaration I cite to an invited book chapter that I co-authored and the courses I have taught at North Carolina State University. As further support for my qualifications, I include Exhibit 2028, a copy of the Invited Book Chapter: G.P. Crawford and M.J. Escuti, *Liquid Crystal Display Technology*, in Encyclopedia of Imaging Science and Technology, ed. J.P. Hornak, (John Wiley & Sons, Inc., 2002), Exhibit 2029, a copy of Syllabus: 492/592-003 – Soft Electronics: Organic Devices & Liquid Crystal Displays, Exhibit 2030, a copy of Lab Module 4 of 4: OTFT: Fabrication and Characterization of an Organic Thin Film Transistor, Exhibit 2031, a copy of a conference paper on another lab-based course I teach, M.C. Ozturk and M.J. Escuti, *A New Introductory Course On Signals, Circuits and Systems*, American Society for Engineering Education Annual Conference, vol. 2532, art. no. 2473, 2006, Exhibit 2032, a copy of the Syllabus for ECE 303- Electromagnetic Fields, and Exhibit 2033, a copy of the Syllabus for E 304- Intro to Nano Science & Technology.

7. Exhibits 2028-2033 demonstrate that I teach and study subjects such as polycrystalline and amorphous silicon TFTs, their structures, materials, peripheral driver circuits, and their use. Exhibit 2028 demonstrates that I have studied the same type of TFTs disclosed in the specification of the '413 patent since before 2002, including the TFTs and peripheral driving circuits formed directly on a glass substrate. *See, e.g.*, Exhibit 2028, at 957-59. Exhibit 2028 cites for support

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