

SEL EXHIBIT NO. 2015

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

IPR2013-00068

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 IPR2013-00068
PATENT 8,068,204

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. 2011) regarding U.S. Patent No. 8,068,204 (the “’204 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 ’204 patent. Additionally, paragraph 42 demonstrates my detailed knowledge of sealants used in LCDs, which is a key element of the ’204 claims.

3. During my deposition, I testified that I had detailed knowledge of LCD devices. Exhibit 2016, 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 2017, 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 2018, 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 2019, a copy of Syllabus: 492/592-003 – Soft Electronics: Organic Devices & Liquid Crystal Displays, Exhibit 2020, a copy of Lab Module 4 of 4: OTFT: Fabrication and Characterization of an Organic Thin Film Transistor, Exhibit 2021, 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 2022, a copy of the Syllabus for ECE 303- Electromagnetic Fields, and Exhibit 2023, a copy of the Syllabus for E 304- Intro to Nano Science & Technology.

7. Exhibits 2018-2023 demonstrate that I teach and study subjects such as polycrystalline and amorphous silicon TFTs, their structures, materials, peripheral driver circuits, and their use. Exhibit 2018 demonstrates that I have studied the same type of TFTs disclosed in the specification of the '204 patent since before 2002, including the TFTs and peripheral driving circuits formed directly on a glass substrate. *See, e.g.*, Exhibit 2018, at 957-59. Exhibit 2018 cites for support

Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.