

Petitioner Bluehouse Global Ltd.

Ex. 1003

UNITED STATES PATENT AND TRADEMARK OFFICE

IN THE UNITED STATES PATENT TRIAL AND APPEAL BOARD

BLUEHOUSE GLOBAL LTD.
Petitioner

v.

SEMICONDUCTOR ENERGY LABORATORY CO., LTD.
Patent Owner

CASE IPR: 2018-01377

U.S. PATENT NO.9,281,405 B2

DECLARATION OF RICHARD A. FLASCK

Mail Stop Patent Board
Patent Trial and Appeal Board
U.S. Patent and Trademark Office
P.O. Box 1450
Alexandria, VA 22313-1450

I, Richard A. Flasck, declare as follows:

I. INTRODUCTION

1. I am over the age of twenty-one (21) and am competent to make this Declaration.

2. I am an independent consultant in liquid crystal display (“LCD”) technology, including manufacturing processes and product design.

A. Engagement

3. I have been retained by counsel for BlueHouse Global Ltd. in the above-captioned *Inter Partes* Review (“IPR”) matter as an independent technical expert.

4. As part of this engagement, I have been retained to review and evaluate whether certain patents and publications disclose to a person of ordinary skill in the art (“POSA”) the subject matter of specific claims of United States Patent No. 9,281,405 B2 (“the ‘405 Patent”) as of the time of the filing date of the application from which the ‘405 Patent issued. I expect to testify regarding the matters set forth in this declaration if asked to do so.

5. I am being compensated on an hourly basis for my work performed in connection with this case. I have received no additional compensation for my work

in this case, and my compensation does not depend upon the contents of this report, any testimony I may provide, or the ultimate outcome of the case.

B. Background and Qualifications

6. I earned my Bachelor of Science degree in Physics from the University of Michigan in 1970. I subsequently earned my M.S. in Physics at Oakland University in 1976.

7. I have nearly fifty (50) years of experience in hi tech product development, including all aspects of LCD systems and technologies, through positions ranging from research and development to manufacturing at multiple large and small technology companies. I have led engineering teams to develop Liquid Crystal on Silicon (LCOS) microdisplay technology. I played a significant part in the early development of amorphous silicon thin film transistor (TFT) active matrix Liquid Crystal Displays (AMLCD), including designing the world's first amorphous silicon TFT LCD pilot line in 1986. I have experience in TFT process and circuit design, data driver and gate driver design, scalars, video circuits, backlighting, and inverter design. I also have a solid functional background in all display technologies, their applications and associated process and manufacturing technologies.

8. I am an inventor or co-inventor of 26 patents, including patents on various aspects of LCD technology, including TFT structure and fabrication. A list

of my patents is included in my curriculum vitae, a copy of which is attached hereto as Appendix B.

9. A detailed description of my professional qualifications, including a listing of my specialties/expertise and professional activities, is contained in my curriculum vitae, a copy of which is attached hereto as Appendix B.

C. Basis of My Opinions and Materials Considered

10. In forming my opinions, I have relied upon my education, knowledge and experience with LCDs and related technologies, including manufacturing processes. I have also relied upon my education, knowledge and experience with electronic design, mechanical design, and processes and materials for LCD manufacture.

11. For this work, I reviewed and considered the following materials:

- U.S. Patent No. 9,281,405 B2 (“the ‘405 Patent”; Ex. 1001), including the specification and claims;
- The prosecution history of United States Patent Application No. 14/337,583 (“the ‘583 Application”), *i.e.*, the prosecution history of the ‘405 Patent (Ex. 1002);

In forming my opinions, I have relied upon my education, knowledge and experience with LCD technologies, including manufacturing processes and product design. I have also relied upon my education, knowledge and experience with

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.