

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAMSUNG DISPLAY CO., LTD. AND DELL INC.,
Petitioner,

v.

SOLAS OLED, LTD.,
Patent Owner.

Patent No. 6,072,450

DECLARATION OF ADAM FONTECCHIO, PH.D.

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I, Adam Fontecchio, Ph.D., declare as follows:

1. I have been retained as a technical consultant by Samsung Display Co., Ltd., who I have been informed is one of the petitioners in the present proceeding, as well as on behalf of Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc., who I have been informed are identified as “real parties in interest” in the present proceeding. For ease of reference, throughout my declaration, I will refer to these entities collectively as “Samsung.” I am also informed that Dell Inc. is a co-petitioner in the present proceeding. Again, for ease of reference, throughout my declaration, I will refer to Samsung Display Co., Ltd. and Dell Inc. together as “Petitioner.”

2. I have been asked by counsel for the Petitioner to consider whether the references listed as Exhibits 1001-1006 and 1009–1011 below disclose or suggest, alone or in combination, the limitations recited in the claims of U.S. Patent 6,072,450 (the “’450 patent”). I have also been asked to consider the state of the art and the prior art available before the filing of the ’450 patent. I have provided my opinions below.

3. I have been informed that a company known as Solas OLED Ltd. alleges to be the owner of the ’450 patent. To the best of my knowledge, I have no financial interest in Samsung, Dell, Solas OLED Ltd., or the ’450 patent. To the best of my recollection, I have had no contact with Solas OLED Ltd. or the named

inventors of the patent, Hiroyasu Yamada, Tomoyuki Shirasaki, and Yoshihiro Kawamura. To the extent any mutual funds or other investments that I own have a financial interest in Samsung, the Patent Owner, or the '450 patent, I am not aware of, nor do I have control over, any financial interest that would affect or bias my judgment.

4. I am being compensated at my standard consulting rate for my time, and my compensation is in no way contingent on the results of these or any other proceedings relating to the above-captioned patent.

I. BACKGROUND AND QUALIFICATIONS

5. I am a professor of electrical engineering specializing in electro-optics and displays. I have studied and researched the function and use of numerous types of display technologies, including TFT-LCD, Holographically-formed Polymer Dispersed Liquid Crystal (H-PDLC) displays, Electrophoretic Displays (EPD), nano-Field Emission Displays (nFED), and novel electroluminescent displays including organic light emitting materials. I have conducted extensive research on color filtering, reflective and transmissive displays, and the fundamental interactions of light and matter. I have published numerous articles and delivered many lectures and research talks on these subjects.

6. I have been employed as a faculty member at Drexel University since 2002. Currently, my rank is that of tenured Full Professor. I served as the Vice-

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