

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.

Case No. IPR2020-00140
U.S. Patent No. 6,072,450

PETITIONER'S REPLY TO PATENT OWNER RESPONSE

LIST OF EXHIBITS

Exhibit	Description
1001	U.S. Patent No. 6,072,450 (the “450 patent”)
1002	File History for U.S. Patent No. 6,072,450
1003	U.S. Patent No. 5,670,792 (“Utsugi”)
1004	JPH053079 (certified translation, “Manabe”)
1005	WO 96/25020 (certified translation, “Eida”)
1006	S.W. Amos, Principles of Transistor Circuits, 8th Ed. (1994)
1007	Declaration of Dr. Adam Fontecchio
1008	<i>Curriculum Vitae</i> of Dr. Adam Fontecchio
1009	JPH053079 (“Manabe”)
1010	WO 96/25020 (“Eida”)
1011	U.S. Patent No. 5,847,516 (“Kishita”)
1012	Claim Construction Memorandum & Order, <i>Solas OLED Ltd. v. Samsung Display Co., Ltd. et al.</i> , 2:19-cv-00152-JRG (E.D. Tex. Apr. 17, 2020)
1013	Frisch declaration
1014	Lerner declaration
1015	Haslam declaration
1016	Claim Construction Order, <i>Solas OLED Ltd. v. Dell Inc., et al.</i> , 6:19-CV-00514, -00515, -00537 (W.D. Tex. August 30, 2020)
1017	Transcript of Deposition of Richard Flasck (November 11, 2020)

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	B. Limitations 4[a]/4[b]: “The display apparatus according to claim 1, wherein said active elements are a selection transistor . . . and a drive transistor”	12
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I. INTRODUCTION

As explained in the Petition (Paper 1, “Pet.”), claims 1–9, 11–13, and 15–18 of U.S. Patent No. 6,072,450 (’450 patent) are unpatentable.

Patent Owner Solas OLED, Ltd. (“Solas”)’s Response (Paper 20, “POR”) abandons the lead arguments from its Preliminary Response, in which it questioned whether Utsugi’s electroluminescent layer emits light in accordance with a voltage, whether Utsugi’s SiO₂ layer is an insulating film, and whether Utsugi’s MgAg electron injection electrode shields visible light.

Solas’s Response advances a new set of arguments that equally lack merit, as discussed below.

II. LEVEL OF ORDINARY SKILL

The parties articulate similar definitions of the level of ordinary skill. Solas merely criticizes Petitioner’s definition “to the extent” it does not specify a length of work experience. POR, 7–8. However, the differences in how the parties have articulated the skill level do not impact any of the patentability issues here. *See id.*, 8 (acknowledging “the arguments in this response apply under petitioners’ definition”); Ex. 1017, 77:13–19.

III. CLAIM CONSTRUCTION

Neither party has raised any claim construction disputes. Petitioner continues to believe that no specific constructions are necessary for this IPR. *See Pet.*, 13. Solas does not contend otherwise.

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