

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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

v.

SOLAS OLED LTD.,  
Patent Owner.

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

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**DECLARATION OF RICHARD A. FLASCK  
IN SUPPORT OF PATENT OWNER'S RESPONSE**

## TABLE OF CONTENTS

I.	INTRODUCTION.....	1
II.	BACKGROUND AND QUALIFICATIONS.....	2
III.	SUMMARY OF THE '450 PATENT .....	5
A.	The Prosecution History of the '450 patent .....	8
IV.	LEVEL OF ORDINARY SKILL IN THE ART .....	9
V.	UNDERSTANDING OF THE LAW .....	11
A.	Claim Construction .....	11
B.	Anticipation.....	12
C.	Obviousness .....	13
VI.	CLAIM CONSTRUCTION.....	15
VII.	PATENTABILITY OVER UTSUGI AND OVER COMBINATIONS WITH UTSUGI.....	17
A.	Limitation 1[c]: “an insulation film formed over said substrate so as to cover said active elements, said insulation having at least one contact hole” .....	18
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” .....	22
C.	Claim 8: “The display apparatus according to claim 1, wherein a constant voltage is applied to said second electrode” .....	22

D. Limitation 15[f]: “an insulation film formed over said substrate so as to cover said drive transistors, said address lines and said data lines, said insulation film having contact holes formed in correspondence with said drive transistors”..... 25

E. Limitation 15[j]: “a first driver circuit for selectively supplying said address signal to said address lines in sequence; and” /  
Limitation 15[k]: “a second driver circuit for supplying said image data to said data lines” ..... 28

VIII. CONCLUSION ..... 31

I, Richard A. Flasck, a resident of San Ramon, California, declare as follows:

## **I. INTRODUCTION**

1. I have been retained by Patent Owner Solas OLED Ltd. (“Solas” or “Patent Owner”) through RAF Electronics Corp. to provide my opinions with respect to their Response to the Petition for *Inter Partes* Review in IPR2020-00140 (“Petition” or “Pet.”) as to U.S. Patent No. 6,072,450 (“’450 patent,” Exhibit 1001). I have no interest in the outcome of this proceeding and my compensation is in no way contingent on my providing any particular opinions.

2. As part of this engagement, I have been asked to provide my opinions regarding whether claims 1–9, 11–13, and 15–18 (“Challenged Claims”) are invalid as anticipated and/or obvious to a person having ordinary skill in the part (“POSITA”) as of the earliest claimed priority date, specifically with reference to the arguments made by Apple Inc. in its Petition for Inter Partes Review (“Petition”) regarding U.S. Patent No. 5,670,792 (Ex. 1003, “Utsugi”), Japanese patent application JPH053079 (Ex. 1004, “Manabe”) and PCT patent publication WO 96/25020 (Ex. 1005, “Eida”).

3. In preparing this Declaration, I have reviewed the Petition, the Institution Decision, the '450 patent (Ex. 1001), the '450 patent file history (Ex. 1002), the Utsugi reference and English translations of the Manabe and Eida references (Exs. 1003–1005), the declaration of Dr. Fontecchio, the Amos textbook (Ex. 1006), the Kishita patent (Ex. 1011), and the district court's claim construction order (Ex. 1012).

## **II. BACKGROUND AND QUALIFICATIONS**

4. My qualifications for forming the opinions set forth in this Declaration are summarized here and explained in more detail in my curriculum vitae.

5. A copy of my curriculum vitae is attached as Ex. 2002.

6. I received a Bachelor of Science degree in Physics from the University of Michigan, Ann Arbor, in 1970.

7. I thereafter received a Master of Science degree in Physics from Oakland University in Rochester, Michigan, in 1976.

8. I am the founder and CEO of RAF Electronics Corp., where I developed and patented Liquid Crystal on Silicon (LCOS) microdisplay projection technology using active matrix transistor arrays as well as developed proprietary LED-based Solid State Lighting (SSL) products.

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