### UNITED STATES PATENT AND TRADEMARK OFFICE

### BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAMSUNG DISPLAY CO., LTD., Petitioner

v.

SOLAS OLED, LTD., Patent Owner

Case IPR2020-00320 Patent No. 7.446,338

### PATENT OWNER'S PRELIMINARY RESPONSE

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	B.	Separately, Any Review of the Prosecution History Disproves Samsung's Premise that Its Primary References and the Relevant Parts of its Secondary Reference Were Never Cited During Prosecution
III.	Peti	itioner's Two Asserted Grounds and References
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### **Table of Authorities**

### Cases

OrthoPediatrics Corp. v. K2M, Inc., IPR2018-01548, Paper 9 (P.T.A.B. March 1, 2019)	19, 26
Statutes and Regulations	
35 U.S.C. § 312(a)(3)	15, 24
37 C.F.R. § 42.104(b)(4)	.1, 3, 15, 24

### Patent Owner's Exhibit List for IPR2020-00320

Pursuant to 37 C.F.R. § 42.63(e), Patent Owner Solas OLED Ltd., hereby

submits its exhibit list associated with the above-captioned inter partes review of

U.S. Patent No. 7,446,338.

Exhibit No.	Description
2001	United States Patent Application Publication 2004/0256617 A1
2002	Defendants' Responsive Claim Construction Brief
2003	Defendants' Claim Construction Presentation
2004	Solas's Notice of Agreement on Previously Disputed Claim
	Construction Terms

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