

IN THE 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.,  
Petitioner,

v.

SOLAS OLED, LTD.,  
Patent Owner.

Case No. IPR2020-00320  
Patent No. 7,446,338

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**DECLARATION OF JEFFREY H. LERNER IN SUPPORT OF  
PETITIONER'S UNOPPOSED MOTION FOR ADMISSION  
*PRO HAC VICE* OF JEFFREY H. LERNER UNDER 37 C.F.R. § 42.10**

I, Jeffrey H. Lerner, declare as follows:

1. I am a partner in the law firm Covington & Burling LLP.
2. I am a member in good standing of the District of Columbia Bar (admitted August 2005). I am also an inactive member of the Illinois Bar (admitted 2003).
3. I have never been suspended or disbarred from practice before any court or administrative body.
4. I have never had an application for admission to practice before any court or administrative body denied.
5. I have had no sanctions or contempt citations imposed against me by any court or administrative body.
6. I have read and will comply with the Office Patent Trial Guide and the Board's Rules of Practice for Trials set forth in part 42 of title 37, Code of Federal Regulations.
7. I agree to be subject to the USPTO Rules of Professional Conduct set forth in 37 C.F.R. §§ 11.101 *et seq.* and disciplinary jurisdiction under 37 C.F.R. § 11.19(a).
8. I have not applied to appear *pro hac vice* in any other proceeding before the Office within the last three (3) years.

9. I am an experienced litigating attorney with sixteen years in private law practice, including experience with fact and expert discovery, trials, appeals, dispositive motions, and *Markman* hearings. I have been counsel in more than twenty patent infringement cases, including cases pending in various U.S. District Courts, including in Texas, Delaware, New Jersey, Massachusetts, Virginia, and Georgia, and in the International Trade Commission.

10. I am familiar with the subject matter and U.S. Patent No. 7,446,338 (“the ’338 Patent”) at issue in this proceeding, including its prosecution history and the scientific field to which the ’338 Patent is addressed. In particular, I have been advising the Petitioner throughout the instant IPR proceeding, and have thereby developed a thorough understanding of the ’338 Patent, the relevant art, and scientific field. I am also familiar with the U.S. Patents and subject matter at issue in related proceedings IPR2020-00140 and IPR2019-01668.

11. I hereby declare that all statements made herein of my own knowledge are true and that all statements made on information and belief are believed to be true; and further that these statements are made with the knowledge that willful false statements and the like so made are punishable

by fine or imprisonment, or both, under Section 1001 of Title 18 of the United States Code.

Dated: August 20, 2020

By 

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Jeffrey H. Lerner  
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