#### UNITED STATES PATENT AND TRADEMARK OFFICE

#### BEFORE THE PATENT TRIAL AND APPEAL BOARD

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## SAMSUNG DISPLAY CO., LTD., Petitioner

v.

SOLAS OLED, LTD., Patent Owner

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Case IPR2020-00320 Patent No. 7.446,338

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



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		<ol> <li>Kobayashi and Shirasaki are directed to different problems, and a POSITA with Kobayashi would not be motivated to look to Shirasaki as Petitioner proposes</li></ol>
	D.	Failure to Show <i>How</i> One Skilled in the Art Would Have Combined Kobayashi with Shirasaski as Proposed by Petitioner or that One Skilled in the Art Would Have a Reasonable Expectation of Success
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### IPR2020-00320 ('338 Patent) FLASCK POR DECLARATION

	D.	Failure to Show that the Combination of Kobayashi in View of
		Shirasaski Satisfies Limitation 1[c]: "a plurality of pixel
		electrodes for the plurality of pixels, respectively, the pixel
		electrodes being arrayed along the interconnections between the
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### PATENT OWNER'S EXHIBIT LIST

Ex.	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
2005	Declaration of Richard A. Flasck
2006	Curriculum Vitae of Richard A. Flasck
2007	Transcript of Deposition of Dr. Adam Fontecchio on September 11, 2020
2008	The New Oxford American Dictionary (2d ed. 2005)



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