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 RESPONSE

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IPR2020-00320 ('338 Patent) PATENT OWNER RESPONSE

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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)

I. Summary of Grounds

Petitioner challenges claims 1–3 and 5–13 of U.S. Patent 7,446,338 ("'338 patent," Exhibit 1001) under two grounds (Pet. at 10–11):

- Ground I: Claims 1–2, 5–6, and 9–11 are obvious over the combination of Kobayashi and Shirasaki.
- Ground II: Claims 1–3 and 5–13 are obvious over the combination of Childs and Shirasaki.

For the reasons below, Petitioner has not shown unpatentability under either ground and the Board should affirm the validity of the challenged claims.

II. The '338 Patent (Ex. 1001)¹

A. Summary of '338 Patent

The '338 patent, titled "Display Panel," was filed by T. Shirasaki, et al. on Sept. 26, 2005 and issued on Nov. 4, 2008. It claims a priority date of Sept. 29, 2004.

Casio, the original assignee of the '338 patent was a pioneer in the development of practical and high performing displays utilizing organic light emitting diodes (OLEDs). The '338 patent concerns display panels with light-emitting elements, such as organic electroluminescent display panels. (Ex. 1001,

¹ See Ex. 2001, Declaration of Richard A. Flasck ("Flasck Decl.") ¶¶ 33–63.

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