

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
WACO DIVISION**

SOLAS OLED LTD., an Irish corporation,

Plaintiff,

v.

LG DISPLAY CO., LTD., a Korean corporation; LG ELECTRONICS, INC., a Korean corporation; and SONY CORPORATION, a Japanese corporation,

Defendants.

CASE NO. 6:19-CV-00236-ADA

JURY TRIAL DEMANDED

**ANSWER AND COUNTERCLAIMS OF DEFENDANT
LG DISPLAY CO., LTD. TO PLAINTIFF'S SECOND AMENDED COMPLAINT**

Defendant LG Display Co., Ltd (“LG Display”) answers each paragraph of the Second Amended Complaint of Solas OLED Ltd. (“Solas” or “Plaintiff”), alleging infringement of U.S. Patent Nos. 7,432,891, 7,573,068, and 7,907,137 (collectively, the “Patents-in-Suit”), and provides defenses and counterclaims as follows:

ANSWER

1. LG Display is without knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1 including the preceding heading, and, on that basis, denies them.

2. LG Display admits that a copy of a document purporting to be U.S. Patent No. 7,432,891 (the “’891 patent”) is attached to the Second Amended Complaint. LG Display admits that a copy of a document purporting to be U.S. Patent No. 7,573,068 (the “’068 patent”) is attached to the Second Amended Complaint. LG Display admits that a copy of a document purporting to be U.S. Patent No. 7,907,137 (the “’137 patent”) is attached to the Second Amended Complaint. LG Display is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 2, and, on that basis, denies them.

3. LG Display admits that LG Display is a corporation organized under the laws of the Republic of Korea. LG Display admits that LG Electronics, Inc. (“LG Electronics”) is a corporation organized under the laws of the Republic of Korea. LG Display is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 3 including the preceding heading, and, on that basis, denies them.

4. LG Display admits that Plaintiff purports to identify general categories of accused products in paragraph 4. Except as expressly admitted, LG Display denies the remaining allegations, if any, contained in paragraph 4.

5. LG Display admits that it designs, produces, and sells OLED display panels. LG Display admits that LG Electronics sells products incorporating LG Display OLED display panels. LG Display admits that Sony Corporation (“Sony”) sells products, including OLED televisions, incorporating LG Display OLED display panels. LG Display is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 5, and, on that basis, denies them.

6. LG Display admits that this Court has subject matter jurisdiction over Plaintiff’s claims made pursuant to 35 U.S.C. §§ 271 and 281, *et seq.* LG Display denies that it has committed or is committing any act of patent infringement within this or any other District. Except as expressly admitted, LG Display denies the remaining allegations, if any, contained in paragraph 6 including the preceding heading.

7. For purposes of this action only, LG Display will not dispute personal jurisdiction of this Court. LG Display denies that it has committed or is committing any act of patent infringement within this or any other District. Except as expressly admitted, LG Display denies the remaining allegations, if any, contained in paragraph 7.

8. LG Display admits that it designs, produces, and sells OLED display panels that are incorporated into products sold by LG Electronics and Sony Corporation. Except as expressly admitted, LG Display denies the remaining allegations contained in paragraph 8.

9. LG Display admits that it and LG Electronics are Korean corporations. For purposes of this action only, LG Display will not dispute whether venue is proper in this Court under 28 U.S.C. § 1391(c)(3). No response is otherwise required to paragraph 9. To the extent that the Court deems a response necessary, LG Display denies the allegations, if any, contained in paragraph 9.

10. LG Display is without knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 10 including the preceding heading, and, on that basis, denies them.

11. LG Display is without knowledge or information regarding the origin of the purported “image and circuit diagram” in paragraph 11 and, at least on that basis, denies that the purported “image and circuit diagram” is an accurate representation of the accused products. Except as expressly admitted, LG Display denies the remaining allegations contained in paragraph 11.

12. LG Display is without knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 12, and, on that basis, denies them.

13. No response is required to paragraph 13 including its preceding heading. To the extent that the Court deems a response necessary, LG Display incorporates by reference its responses to paragraphs 1 through 12 of the Second Amended Complaint as set forth above.

14. LG Display admits the allegations contained in paragraph 14.

15. LG Display is without knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 15, and, on that basis, denies them.

16. Denied.

17. Denied.

18. Denied.

19. LG Display admits that the '891 patent purports to claim priority to foreign application DE10254511. LG Display is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 19, and, on that basis, denies them.

20. LG Display admits that KR100768047B1 is a Korean patent titled “OLED display apparatus and drive method thereof” that cites DE10254511B4 and identifies “LG.PHILIPS LCD CO., LTD” as the applicant and a filing date of November 30, 2005. LG Display admits that KR101200884B1 is a Korean patent titled “Light emitting diode and light emitting display device and method for driving the same” that cites KR100580956B1 and identifies “LG DISPLAY CO., LTD.” as the applicant and a filing date of June 14, 2006. LG Display admits that KR101390316B1 is a Korean patent titled “AMOLED and driving method thereof” that cites KR20040045352A and identifies “LG DISPLAY CO., LTD” as the applicant and a filing date of October 30, 2007. LG Display admits that KR101597037B1 is a Korean patent titled “Organic light emitting display for compensating electrical characteristics deviation of driving element” that cites DE10254511B4 and identifies “LG Display Co., Ltd.” as the applicant and a filing date of June 26, 2014. Except as expressly admitted, LG Display denies the remaining allegations, if any, contained in paragraph 20.

21. Denied.

22. LG Display admits that LG Electronics has invested in LG Display. LG Display admits that it has prepared and prosecuted patent applications. LG Display denies that the '891 patent is relevant to the products designed by LG Display. LG Display is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 22, and, on that basis, denies them.

23. Denied.

24. LG Display admits that JP5278119B2 is a Japanese Patent titled “Method of driving a display device” that cites DE10254511A and identifies “SONY CORP” as the applicant and a filing date of April 2, 2009. LG Display is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 24, and, on that basis, denies them.

25. Denied.

26. Denied.

27. LG Display admits that it supplies OLED display panels that are incorporated in the Sony Bravia 55A1 OLED Television. Except as expressly admitted, LG Display denies the remaining allegations contained in paragraph 27.

28. Denied.

29. Denied.

30. No response is required to paragraph 30 including the preceding heading. To the extent that the Court deems a response necessary, LG Display incorporates by reference its responses to paragraphs 1 through 29 of the Second Amended Complaint as set forth above.

31. LG Display admits the allegations contained in paragraph 31.

32. LG Display is without knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 32, and, on that basis, denies them.

33. Denied.

34. LG Display denies that the Sony Bravia 55A1 OLED Television and the LG OLED55B7A OLED Television infringe any claim of the '068 patent. LG Display is without knowledge or information sufficient to form a belief as to any allegations regarding the Sony Trimaster EL PVM-A250 OLED Monitor or the Sony Electronic Viewfinder FDA-EV1MK and, on that basis, denies them. LG Display denies the remaining allegations contained in paragraph 34.

35. Denied.

36. LG Display admits that US10,103,212B2 is a United States Patent titled "Display device, method of manufacturing the same, and electronic apparatus" that cites US2006/0098521A1 and identifies "Sony Corporation" as the applicant and a filing date of July 16, 2014. LG Display is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 36, and, on that basis, denies them.

37. Denied.

38. Denied.

39. Denied.

Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.