

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

SOLAS OLED LTD.,

Plaintiff,

Case No. 6:19-cv-00236-ADA

v.

LG DISPLAY CO., LTD., et al.,

Defendants.

**PLAINTIFF SOLAS OLED LIMITED’S DISCLOSURE OF
PRELIMINARY INFRINGEMENT CONTENTIONS**

Pursuant to paragraph two of the Order Governing Proceedings—Patent Case entered November 8, 2019 (Dkt. 50), patent owner Solas OLED Limited hereby provides its disclosure of preliminary infringement contentions and its accompanying document production. This disclosure is based on the information available to Solas as of the date of this disclosure, before Solas has received any discovery on the design or operation of the defendants’ products. Solas reserves the right to amend this disclosure to the full extent permitted under the court’s rules and orders.

I. PRELIMINARY INFRINGEMENT CONTENTIONS

A. Asserted Claims

Solas asserts that defendants LG Display Co., Ltd.; LG Electronics, Inc.; and Sony Corporation (collectively “Defendants”) infringe one or more of the following claims, directly, by inducement, by contributory infringement:

| <i>U.S. Patent No.</i> | <i>Asserted Claims</i> |
|------------------------|------------------------|
| 7,432,891 | 1, 3 |
| 7,573,068 | 1, 5, 10, 12, 13, 17 |
| 7,907,137 | 10, 11, 15, 36, 37, 39 |

Collectively, these three patents are referred to herein as the Asserted Patents, and these claims as the Asserted Claims.

B. Accused Instrumentalities of Which Solas Is Aware

In this section, Solas provides lists of accused products that Solas is aware of infringing based upon information presently available to it and its investigation to date. Solas's infringement claims are not limited to these listed products and specifically extend to all products and apparatuses of Defendants similar to the listed products that include the claimed elements. Unless otherwise stated, Solas's infringement assertion apply to all variations, versions, editions, and applications of each of the listed products.

1. U.S. Patent No. 7,432,891

Solas accuses the following products that it is presently aware of infringing each of the Asserted Claims of the '891 patent:

LG OLED TV B9 - 55" 65"
 LG OLED TV C9 - 55" 65" 77"
 LG OLED TV E9 - 55" 65"
 LG SIGNATURE WALLPAPER OLED TV W9 - 65" 77" 88"
 LG OLED TV B8 - 55" 65"
 LG OLED TV C8 - 55" 65" 77"
 LG OLED TV E8 - 55" 65"
 LG SIGNATURE OLED TV W8 - 65" 77"
 LG OLED TV C7 - 65"
 LG OLED TV E7 - 65"
 Sony Bravia A9G OLED - 55" 65" 77"
 Sony Bravia A9F OLED - 55" 65"
 Sony Bravia A8G OLED - 55" 65"

Sony Bravia A1E OLED – 55” 65” 77”
Sony Bravia A8F OLED – 55” 65”

Defendants’ products in the preceding list; all variations, editions, and applications of the foregoing; and all products and apparatuses of Defendants similar to the foregoing that include the claimed elements are the ’891 Accused Instrumentalities.

2. U.S. Patent No. 7,573,068

Solas accuses the following products that it is presently aware of infringing each of the Asserted Claims of the ’068 patent:

LG OLED TV B9 - 55” 65”
LG OLED TV C9 - 55” 65” 77”
LG OLED TV E9 - 55” 65”
LG SIGNATURE WALLPAPER OLED TV W9 - 65” 77” 88”
LG OLED TV B8 - 55” 65”
LG OLED TV C8 - 55” 65” 77”
LG OLED TV E8 - 55” 65”
LG SIGNATURE OLED TV W8 - 65” 77”
LG OLED TV C7 – 65”
LG OLED TV E7 - 65”
Sony Bravia A9G OLED – 55” 65” 77”
Sony Bravia A9F OLED – 55” 65”
Sony Bravia A8G OLED – 55” 65”
Sony Bravia A1E OLED – 55” 65” 77”
Sony Bravia A8F OLED – 55” 65”
Sony Electronic Viewfinder FDA-EV1MK
Sony Trimaster EL PVM-A250 OLED Monitor

Defendants’ products in the preceding list; all variations, editions, and applications of the foregoing; and all products and apparatuses of Defendants similar to the foregoing that include the claimed elements are the ’068 Accused Instrumentalities.

3. U.S. Patent No. 7,907,137

Solas accuses the following products that it is presently aware of infringing each of the Asserted Claims of the '137 patent:

LG OLED TV B9 - 55" 65"
LG OLED TV C9 - 55" 65" 77"
LG OLED TV E9 - 55" 65"
LG SIGNATURE WALLPAPER OLED TV W9 - 65" 77" 88"
LG OLED TV B8 - 55" 65"
LG OLED TV C8 - 55" 65" 77"
LG OLED TV E8 - 55" 65"
LG SIGNATURE OLED TV W8 - 65" 77"
LG OLED TV C7 - 65"
LG OLED TV E7 - 65"
Sony Bravia A9G OLED - 55" 65" 77"
Sony Bravia A9F OLED - 55" 65"
Sony Bravia A8G OLED - 55" 65"
Sony Bravia A1E OLED - 55" 65" 77"
Sony Bravia A8F OLED - 55" 65"

Defendants' products in the preceding list; all variations, editions, and applications of the foregoing; and all products and apparatuses of Defendants similar to the foregoing that include the claimed elements are the '137 Accused Instrumentalities.

C. Claim Charts

Solas's analysis of Defendants' products and apparatuses is based upon information that is publicly available and based on Solas's own investigation prior to any discovery in this action.

While the publicly available information constitutes evidence of the methods and apparatuses used by Solas in the Accused Instrumentalities, direct evidence of the actual apparatuses and methods are at times not publicly available. Accordingly, these infringement contentions are based on the available public information, laboratory analysis and reasonable inferences drawn from that information.

Solas reserves the right to amend or supplement these disclosures for any of the following reasons (along with any other reason that may be permitted under the court's rules and orders):

- (1) Defendants provide evidence of the apparatuses and methods used in the Accused Instrumentalities;
- (2) The Asserted Claims may include elements that involve features that are implemented by hardware structures and logic and Solas's current positions on infringement are set forth without the benefit of access to Defendant's source code, schematics, drawings, or other proprietary specifications or information, which cannot be obtained through publicly available information, for the Accused Instrumentalities. Therefore, it may be necessary for Solas to supplement its positions on infringement after a complete production of such proprietary specifications or information by Defendants;
- (3) Solas's position on infringement of specific claims will depend on the claim constructions adopted by the Court. Because said constructions have not yet occurred, Solas cannot take a final position on the bases for infringement of the Asserted Claims; and
- (4) Solas's investigation and analysis of Defendants' Accused Instrumentalities are based upon information made publicly available by Defendants and by Solas's own investigations. Solas reserves the right to amend these contentions based upon discovery of non-public information that Solas anticipates receiving from Defendants during discovery.

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