

**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**

**DEFENDANT LG DISPLAY CO., LTD.'S INITIAL DISCLOSURES**

Defendant LG Display Co., Ltd. ("LG Display") provides the following Initial Disclosures pursuant to the Order Governing Proceedings (Docket No. 50), and in satisfaction of Federal Rule of Civil Procedure 26(a)(1). LG Display makes these disclosures based on the information that is presently available. LG Display reserves the right to supplement or amend these disclosures based on further investigation and discovery conducted in this case, the Court's claim construction, and any other reasons impacting the accuracy and completeness of these disclosures. By making these disclosures, LG Display does not waive its rights to object to the admissibility of any information disclosed herein.

**I. RULE 26(A)(1)(A)(I): IDENTIFICATION OF INDIVIDUALS LIKELY TO HAVE DISCOVERABLE INFORMATION**

Based on information presently available, LG Display provides the following disclosure of individuals described in Fed. R. Civ. P. 26(a)(1)(A)(i):

Name	Address and Telephone Number	Subject
Solas OLED Ltd.	4-5 Burton Hall Rd Sandyford Dublin 18 Ireland	Ownership of the patents-in-suit; conception and reduction to practice of the patents-in-suit; claim scope and interpretation; prosecution of

Name	Address and Telephone Number	Subject
		the patents-in-suit; products or other embodiments of the patents-in-suit; public disclosures and sales or offers to sell products or other embodiments of the patents-in-suit; licenses to and efforts to license the patents-in-suit; valuation of the patents-in-suit; Solas's business and business practices, and Solas's finances, accounting, marketing, sales, manufacture, and business plans; prior art and the state of the art; and any basis for alleged damages.
Casio Computer Co., Ltd.	6-2, Hon-Machi 1-Chome Shibuya-Ku, Tokyo 151-8543 Japan	Knowledge of design, development, manufacture, marketing, sale, licensing, distribution, or operation of products that incorporate the alleged inventions of the patents-in-suit; knowledge of prior art, the conception and reduction to practice of inventions claimed in the '137 and '068 patents, the prosecution of the '137 and '068 patents and related patents, and the assignment and ownership of the '137 and '068 patents; licenses to and efforts to license the '137 and '068 patents; public disclosures and sales or offers to sell products or other embodiments of the patents-in-suit.
Universitaet Stuttgart (Stuttgart University)	Keplerstrasse 7 Stuttgart 71065 Germany	Knowledge of design, development, manufacture, marketing, sale, licensing, distribution, or operation of products that incorporate the alleged inventions of the patents-in-suit; knowledge of

Name	Address and Telephone Number	Subject
		prior art, the conception and reduction to practice of inventions claimed in the '891 patent, the prosecution of the '891 patent and related patents, and the assignment and ownership of the '891 patent; licenses to and efforts to license the '891 patent; public disclosures and sales or offers to sell products or other embodiments of the patents-in-suit.
Norbert Fruehauf	Keplerstrasse 7 Stuttgart 71065 Germany	Named inventor of the '891 patent; the alleged invention, conception and reduction to practice of the invention; prior art, invalidity, unenforceability, and claim scope; the prosecution of the '891 patent and related patents; and the assignment and ownership of the '891 patent; public disclosures and sales or offers to sell products or other embodiments of the patents-in-suit.
Satoru Shimoda	Fussa, Japan	Named inventor of the '068 patent; the alleged invention, conception and reduction to practice of the invention; prior art, invalidity, unenforceability, and claim scope; the prosecution of the '068 patent and related patents; and the assignment and ownership of the '068 patent; public disclosures and sales or offers to sell products or other embodiments of the patents-in-suit.
Tomoyuki Shirasaki	Higashiyamato, Japan	Named inventor of the '068 and '137 patents; the alleged invention, conception and

Name	Address and Telephone Number	Subject
		reduction to practice of the invention; prior art, invalidity, unenforceability, and claim scope; the prosecution of the '068 and '137 patents and related patents; and the assignment and ownership of the '068 and '137 patents; public disclosures and sales or offers to sell products or other embodiments of the patents-in-suit.
Jun Ogura	Fussa, Japan	Named inventor of the '068 and '137 patents; the alleged invention, conception and reduction to practice of the invention; prior art, invalidity, unenforceability, and claim scope; the prosecution of the '068 and '137 patents and related patents; and the assignment and ownership of the '068 and '137 patents; public disclosures and sales or offers to sell products or other embodiments of the patents-in-suit.
Minoru Kumagai	Tokyo, Japan	Named inventor of the '068 patent; the alleged invention, conception and reduction to practice of the invention; prior art, invalidity, unenforceability, and claim scope; the prosecution of the '068 patent and related patents; and the assignment and ownership of the '068 patent; public disclosures and sales or offers to sell products or other embodiments of the patents-in-suit.
Richard Barth	630 Ninth Avenue Suite 1010 New York, NY 10036-3744	Prosecution of the '137 and '068 patents.

Name	Address and Telephone Number	Subject
Marshall Chick	630 Ninth Avenue Suite 1010 New York, NY 10036-3744	Prosecution of the '137 and '068 patents.
David Dunbar	630 Ninth Avenue Suite 1010 New York, NY 10036-3744	Prosecution of the '137 and '068 patents.
Herbert Goodman	630 Ninth Avenue Suite 1010 New York, NY 10036-3744	Prosecution of the '137 and '068 patents.
Douglas Holtz	630 Ninth Avenue Suite 1010 New York, NY 10036-3744	Prosecution of the '137 and '068 patents.
Leonard Holtz	630 Ninth Avenue Suite 1010 New York, NY 10036-3744	Prosecution of the '137 and '068 patents.
Ian Volek	630 Ninth Avenue Suite 1010 New York, NY 10036-3744	Prosecution of the '137 and '068 patents.
Michael Messinger	1000 Wisconsin Ave. NW Suite 200 Washington DC 20007	Prosecution of the '891 patent.
Khaled Shami	1000 Wisconsin Ave. NW Suite 200 Washington DC 20007	Prosecution of the '891 patent.
Woonjim Nam	Contact through counsel.	Development and operation of one or more of the Accused Products.
Hak-Soo Kim	Contact through counsel.	Prior art, including prior art related to the '891 patent.

Any contact with LG Display's employees listed above may be made only through LG Display's counsel of record.

In addition to the individuals listed above, LG Display incorporates into the list any authors of prior art that LG Display discloses in connection with its Invalidity Contentions and/or any *inter*

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