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VIA EMAIL

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Re: *Solas OLED Ltd. v. LG Display Co., Ltd., LG Electronics, Inc., & Sony Corporation*, Case No. 6:19-cv-00236-ADA

Dear Philip:

Defendants LG Display Co., Ltd., LG Electronics, Inc., & Sony Corporation hereby stipulate that, if the Patent Trial and Appeal Board (“PTAB”) institutes the pending *inter partes* review petition in IPR2020-01055 challenging the patentability of claims 1, 9, 10, 11, 15, 36, 37, and 39 of U.S. Patent Number 7,907,137, then Defendants will not pursue the instituted invalidity grounds in the above-captioned litigation, 6:19-cv-00236.

- For convenient reference, the proposed invalidity grounds in IPR2020-01055 are: Claims 1, 10, 11, 36 and 37 are unpatentable under 35 U.S.C. § 103 over Miyazawa (U.S. Appl. Publ. No. 2005/0116902), alone or with Childs (Int’l Pat. Publ. No. WO 2005/069267).
- Claims 9, 15 and 39 are unpatentable under 35 U.S.C. § 103 over Miyazawa, alone or with Childs, and Kasai (U.S. Appl. Pub. No. 2005/0156837).

To avoid any doubt, if the PTAB declines institution of IPR2020-01055, Defendants reserve the right to pursue these invalidity grounds in the parallel litigation.

Best Regards,

/s/ Douglas E. Lumish

Douglas E. Lumish
of LATHAM & WATKINS LLP

LG Display Co., Ltd.
Exhibit 1021