

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

SOLAS OLED LTD.,

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

**PLAINTIFF SOLAS OLED LTD.’S RESPONSES AND OBJECTIONS TO
DEFENDANTS’ FIRST SET OF INTERROGATORIES (NOS. 1-17)**

Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure, Plaintiff Solas OLED Ltd. (“Solas”) hereby objects and responds to Defendants LG Display Co., Ltd, LG Electronics, Inc and Sony Corporation’s (collectively “Defendants”) First Set of Interrogatories as follows:

I. PRELIMINARY STATEMENT

Discovery in this matter is still ongoing. Solas is presently pursuing its investigation and analysis of the facts and law relating to this case and has not completed such investigation or preparation for trial. Therefore, these responses and objections, while based on diligent factual exploration by Solas and its counsel, reflect only Solas’s current state of knowledge, understanding and belief with regard to the matters about which inquiry has been made. Solas anticipates that,

LG Display Co., Ltd.
Exhibit 1030

(irrelevant pages omitted)

extent that it seeks information protected by the attorney-client privilege, the work product doctrine, or any other applicable privilege.

Subject to and without waiving its specific or general objections, Solas responds as follows:

Pursuant to Federal Rule of Civil Procedure 33(d), Solas has produced or will produce documents from which information responsive to this interrogatory may be determined.

Solas's investigation is ongoing; Solas reserves the right to modify or supplement this response should additional information become available.

INTERROGATORY NO. 14:

For each Asserted Claim of each Asserted Patent, describe whether you assert the claim is valid, and for each claim you assert is valid: (a) describe in detail each and every basis for your contention of validity; (b) with respect to each prior art reference, or combination of prior art references, identified by Defendants as a basis for invalidity under 35 U.S.C. § 102 or § 103, describe in detail each and every basis on which you contest such assertion of invalidity, including but not limited to which, if any, limitation of each claim you assert is not disclosed by that prior art reference or combination of prior art references, and describe in detail the complete basis for any disagreement you have with the analysis set forth by Defendants; (c) with respect to 35 U.S.C. § 112, describe in detail each and every basis for your contention that the requirements of 35 U.S.C. § 112 are satisfied, including describe in detail the complete basis for any disagreement you have with § 112 analysis set forth by Defendants; (d) identify all Documents you assert support your assertions of validity; and (e) identify the three (3) Persons most knowledgeable about the factual bases for your assertions.

RESPONSE TO INTERROGATORY NO. 14:

Solas objects to this interrogatory on the grounds that it is overbroad and unduly burdensome. Solas objects to this interrogatory on the grounds that it is impermissibly compound. Solas further objects to this interrogatory to the extent that it seeks information protected by the attorney-client privilege, the work product doctrine, or any other applicable privilege. Solas further objects that this interrogatory seeks contentions upon matters which Defendants carry the burden of proof. Solas further objects to this request because it prematurely seeks disclosure of expert opinion.

Subject to and without waiving its specific or general objections, Solas responds as follows. Solas asserts that each of the Asserted Claims is valid. The Asserted Patents are entitled to a presumption of validity and Defendants have failed to rebut that presumption. An expert opinion on validity would be premature at this point at least because Defendants have not yet served their expert reports detailing their theories as to the alleged invalidity of the Asserted Claims. Defendants carry the burden of proof to show by clear and convincing evidence that the Asserted Claims are invalid, and Solas is not required to respond to theories that have not yet been fully propounded by Defendants. Should Defendants serve expert reports setting forth their theories alleging that the Asserted Claims are invalid, Solas will serve a rebuttal expert report concerning validity, on December 4, 2020, in accordance with the Court's Scheduling Order (Dkt. No. 59), and Solas directs Defendants to that expert report.

Solas's investigation is ongoing; Solas reserves the right to modify or supplement this response should additional information become available.

(irrelevant pages omitted)

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