

Filed on behalf of: LG Display Co., Ltd.

Entered: October 8, 2020

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

LG DISPLAY CO., LTD.,
Petitioner,

v.

SOLAS OLED LTD.,
Patent Owner.

Case IPR2020-01055
Patent 7,907,137

**PETITIONER'S REPLY TO THE
PATENT OWNER PRELIMINARY RESPONSE**

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STATUTES

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Exhibit List

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1001	U.S. Patent No. 7,907,137 (“’137 Patent”)
1002	Prosecution history for U.S. Patent Application 11/391,941 (“’137 FH”)
1003	Declaration of Miltiadis K. Hatalis, Ph.D., in Support of Petitioner’s Request for <i>Inter Partes</i> Review (“Hatalis”)
1004	Curriculum Vitae of Miltiadis K. Hatalis, Ph.D.
1005	U.S. Patent Application Publication No. 2005/0116902 (“Miyazawa”)
1006	International Patent Application Publication No. WO 2005/069267 (“Childs”)
1007	U.S. Patent Application Publication No. 2005/0156837 (“Kasai”)
1008	A. Ortiz-Conde, et. al., <i>A Review of Recent MOSFET Threshold Voltage Extraction Methods</i> , 583 <i>Microelectronics Reliability</i> 42 (2002) (“Ortiz-Conde”)
1009	Solas's Opening Claim Construction Brief, <i>Solas OLED Ltd. v. LG Display Co., Ltd., et al.</i> , Case No. 6:19-cv-00236-ADA, Dkt. 68 (W.D. Tex. Mar. 13, 2020) (“Solas's Op. Claim Construction Br.”)
1010	Defendants' Opening Claim Construction Brief, <i>Solas OLED Ltd. v. LG Display Co., Ltd., et al.</i> , Case No. 6:19-cv-00236-ADA, Dkt. 67 (W.D. Tex. Mar. 13, 2020) (“Defendants' Op. Claim Construction Br.”)
1011	U.S. Patent Application Publication No. 2002/0101172 (“Bu”)
1012	Excerpts from Neil H.E. Weste & Kamran Eshraghian, <i>Principles of CMOS VLSI Design (2nd Ed. 1993)</i> (“Weste”)

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1013	Answer and Counterclaims of Defendant LG Display Co., Ltd. to Plaintiff's Second Amended Complaint, <i>Solas OLED Ltd. v. LG Display Co., Ltd., et al.</i> , Case No. 6:19-cv-00236-ADA, Dkt. 41 (W.D. Tex. Oct. 28, 2019) ("Answer")
1014	UK Patent Application No. 2,389,952 ("Routley")
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1018	U.S. Patent No. 7,576,718 ("Miyazawa-718")
1019	U.S. Patent Application Publication No. 2005/0067971 ("Kane")
1020	Email from counsel for Petitioner to Patent Trial and Appeal Board (Sept. 30, 2020)
1021	Letter from counsel for LG Display Co. Ltd., LG Electronics, Inc. and Sony Corporation to counsel for Solas OLED Ltd. (Oct. 8, 2020)
1022	U.S. Patent Application Publication No. 2005/0099412 ("Kasai '412")
1023	Letter from counsel for Solas OLED Ltd. to ITC (Sept. 14, 2020)
1024	Claim Construction Order, <i>Solas OLED Ltd. v. LG Display Co., Ltd., et al.</i> , Case No. 6:19-cv-00236-ADA, Dkt. 82 (W.D. Tex. June 9, 2020)

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1025	Defendants' Unopposed Motion for Issuance of Letter Rogatory to Casio Computer Co., Ltd, <i>Solas OLED Ltd. v. LG Display Co., Ltd., et al.</i> , Case No. 6:19-cv-00236-ADA, Dkt. 96 (W.D. Tex. Sept. 8, 2020)
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1031	Plaintiff Solas OLED Ltd.'s First Supplemental Responses and Objections to Defendants' First Set of Interrogatories, <i>Solas OLED Ltd. v. LG Display Co., Ltd., et al.</i> , Case No. 6:19-cv-00236-ADA (W.D. Tex. Sept. 11, 2020) (Excerpts)
1032	Lex Machina report of Solas OLED Ltd. district court cases

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