

**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**

**DEFENDANTS' PROPOSED CLAIM CONSTRUCTIONS**

Pursuant to the Court's December 21, 2019 Scheduling Order (Dkt. No. 59), Defendants LG Display Co., LTD. ("LGD"), LG Electronics, Inc. ("LGE"), and Sony Corporation ("Sony") (collectively, "Defendants") propose the following claim constructions ("Proposed Constructions").

Defendants base these Proposed Constructions upon their current knowledge, understanding, and belief as to the facts and information available as of this date. Defendants reserve the right to supplement or amend these disclosures in response to the parties' meeting and conferring, Solas's proposed claim constructions, and as otherwise permitted by the Order Governing Proceedings (Dkt. No. 50) and consistent with the Scheduling Order (Dkt. No. 59).

Defendants' Proposed Construction for any term does not imply that the claim satisfies 35 U.S.C. § 112, and any indication that any term does not satisfy 35 U.S.C. § 112 does not imply that any other terms do satisfy 35 U.S.C. § 112. Defendants Proposed Terms are not presented in any particular order of importance.

Subject to the foregoing, Defendants' Proposed Constructions are:

**A. U.S. Patent No. 7,907,137 (“137 patent”)**

<b>Claim Terms</b>	<b>Asserted Claim(s)</b>	<b>Proposed Construction</b>
“a gradation current having a current value”	10, 36	an actual current (not voltage) with a value corresponding to a luminance level
“generates, as the gradation signal, a non-light emitting display voltage having a predetermined voltage value”  “a non-light emitting display voltage having a predetermined voltage value for allowing the optical element to perform a non-light emitting operation is generated as the gradation signal”	15, 39	indefinite
“... through a data line ... through the data line ... through the data line”	10, 36	the gradation current is supplied, the threshold voltage is detected, and the compensation voltage is applied through the same data line
“before”	10	earlier in time (not at the same time)
“after”	36	later in time (not at the same time)
“gradation signal”	10, 15, 36, 37, 39	a gradation current with a current value sent to a pixel to set a luminance gradation
“luminance gradation”	10, 36	light emitting level

**B. U.S. Patent No. 7,432,891 (“891 patent”)**

<b>Claim Terms</b>	<b>Asserted Claim(s)</b>	<b>Proposed Construction</b>
“a third thin film transistor which during driving its gate through a driving conductor taps a diode driving current at an output of said first current-driving transistor and supplies a current measuring-[measuring] and voltage regulating circuit, said current measuring- and voltage regulating circuit providing to the data conductor a	1, 3	all of the functions of the third thin film transistor are performed during driving its gate

Claim Terms	Asserted Claim(s)	Proposed Construction
voltage signal which is dependent on a current measuring result and a voltage comparison”		
“current measuring”	1, 3	measuring actual current (not voltage)
“wherein all above mentioned elements of the driving circuit are located at a same side of said light emitting diode”	3	wherein all above mentioned elements of the driving circuit are electrically connected to the anode or cathode of said light emitting diode
“the diode . . . acts as a switch”	1, 3	causes current directed to the diode to flow through the third transistor

**C. U.S. Patent No. 7,573,068 (“’068 patent”)**

Claim Terms	Asserted Claim(s)	Proposed Construction
“formed on said plurality of supply lines along said plurality of supply lines”	1	formed on said plurality of supply lines over the length of said plurality of supply lines
“supply lines”	1, 13	conductive lines supplying current or voltage
“connected to said plurality of supply lines along said plurality of supply lines”	13	connected to said plurality of supply lines over the length of said plurality of supply lines
“patterned together [with]”	1, 13	patterned at the same time [with]
“patterned”	1, 13	formed in a single layer
“signal lines”	1, 13	conductive lines supplying a value corresponding to a luminance level

Claim Terms	Asserted Claim(s)	Proposed Construction
“feed interconnections”	1, 10, 12, 13, 17	conductive lines in a layer different from the gates, sources, and drains

Dated: February 21, 2020

Respectfully Submitted

/s/ Douglas E. Lumish

Jennifer H. Doan  
Texas Bar No. 08809050  
Joshua R. Thane  
Texas Bar No. 24060713  
Cole Alan Riddell  
Texas Bar No. 24105423  
HALTOM & DOAN  
6500 Summerhill Road, Suite 100  
Texarkana, TX 75503  
Telephone: (903) 255-1000  
Facsimile: (903) 255-0800  
Email: jdoan@haltomdoan.com  
Email: jthane@haltomdoan.com  
Email: criddell@haltomdoan.com

Douglas E. Lumish  
California State Bar No. 183863  
Email: doug.lumish@lw.com  
Gabriel S. Gross  
California State Bar No. 254672  
Email: gabe.gross@lw.com  
Andrew Max Goldberg  
California State Bar No. 307254  
Email: drew.goldberg@lw.com  
**LATHAM & WATKINS LLP**  
140 Scott Drive  
Menlo Park, CA 94025  
Tel: 650.328.4600  
Fax: 650.463.2600

Joseph H. Lee  
California State Bar No. 248046  
Email: joseph.lee@lw.com  
**LATHAM & WATKINS LLP**  
650 Town Center Drive, 20th Floor  
Costa Mesa, CA 92626  
Tel: 714.540.1235  
Fax: 714.755.8290

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