

Strang, Jonathan (DC)

From: Strang, Jonathan (DC)
Sent: Wednesday, September 30, 2020 9:08 AM
To: Trials
Cc: Gross, Gabriel (Bay Area); Lumish, Douglas (Bay Area); Lee, Joseph (OC); #C-M LGD SOLAS - LW TEAM; Davis, Blake (Bay Area); nrubin_raklaw.com; Reza Mirzaie; Kent Shum; rak_solas@raklaw.com; 'Philip Wang'
Subject: IPR2020-01055 (LG Display v. Solas, '137 patent) - Reply to POPR

Dear Board,

Petitioner LG seeks leave to file a five-page Reply addressing the *NHK Spring/Fintiv* issues raised in Patent Owner Solas's preliminary response in the subject IPR. Good cause exists because Petitioner could not meaningfully address, predict, or rebut Patent Owner's arguments, or the facts as they currently stand, when it filed its Petition nearly four months ago.

In the spirit of cooperation between the parties, Petitioner offered to agree to a sur-reply of the same length if Patent Owner would agree to Petitioner's proposed Reply. Patent Owner refused the offer. Nonetheless, in the interest of fairness and ensuring the Board is fully briefed before reaching its decision, Petitioner will not oppose a Patent Owner sur-reply should the Board grant leave to Petitioner to file a Reply.

Patent Owner opposes because *NHK Spring* and *Fintiv* were designated precedential well before the Petition, and Petitioner already addressed discretionary denial in the Petition.

If a five-page Reply is allowed, Patent Owner respectfully requests a five-page sur-reply limited to the same issues.

The parties are available for a conference call with the Board at the following times (all times Eastern).

- Friday, October 2, after 1 p.m.
- Monday, October 5, after 1 p.m.
- Tuesday, October 6, after noon.
- Wednesday, October 7, after noon.

Respectfully,

Jonathan Strang
Counsel for Petitioner

Jonathan M. Strang

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LG Display Co., Ltd.
Exhibit 1020
LG Display v. Solas