

**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”)

Claim Terms	Asserted Claim(s)	Proposed Construction
“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”)

Claim Terms	Asserted Claim(s)	Proposed Construction
“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

Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.