

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

Entered: December 10, 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 IPR2020-01238
Patent 7,573,068

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

TABLE OF AUTHORITIES**Page(s)****CASES**

<i>In re Adobe</i> , 823 F. App'x 929 (Fed. Cir. 2020)	2
<i>Apple Inc. v. Fintiv, Inc.</i> , IPR2020-00019, Paper 11 (Mar. 20, 2020)	1, 3, 4, 5
<i>Apple Inc. v. Maxell</i> , IPR2020-00204, Paper 11 (June 19, 2020).....	3
<i>Apple Inc. v. Neodron</i> , IPR2020-00778, Papers 1, 4, 10 (Apr. 16-Sept. 14, 2020).....	4
<i>Apple Inc. v. Seven Networks</i> , IPR2020-00506, Paper 11 (Sept. 1, 2020).....	2, 3, 4
<i>Cuozzo Speed Techs. v. Lee</i> , 136 S. Ct. 2131 (2016).....	1
<i>Google v. Parus Holdings</i> , IPR2020-00846, Paper 9 (Oct. 21, 2020)	2, 3
<i>Henry v. INS</i> , 74 F.3d 1 (1st Cir. 1996).....	4
<i>Medtronic v. Avanos Med. Sales</i> , IPR2020-00895, Papers 3, 4, 16 (May 29-Oct. 23, 2020).....	4
<i>Nidec Motor Corp. v. Zhongshan Broad Ocean Motor Co.</i> , 868 F.3d 1013 (Fed. Cir. 2017)	5
<i>Sand Revolution II v. Cont'l Intermodal Group-Trucking</i> , IPR2019-01393, Paper 24 (June 16, 2020).....	2, 3, 4

Exhibit List

Ex. No.	Description
1001	U.S. Patent No. 7,573,068 (“’068 patent”)
1002	Prosecution history for U.S. Patent Application No. 11/232,368 (“’068 FH”)
1003	Declaration of Miltiadis Hatalis, Ph.D., in Support of Petitioner’s Request for <i>Inter Partes</i> Review (“Hatalis”)
1004	Curriculum Vitae of Miltiadis Hatalis, Ph.D.
1005	International Patent Publication No. WO 2004/090853 (“Shin”)
1006	International Patent Publication No. WO 03/079442 (“Hector”)
1007	<i>Thin Film Transistors, Materials and Processes, Volume 2: Polycrystalline Silicon Thin Film Transistors</i> (Yue Kuo ed., 2004) (excerpts) (“Kuo”)
1008	Solas’s Opening Claim Construction Brief, <i>Solas OLED Ltd. v. LG Display Co.</i> , No. 6:19-cv-00236-ADA (W.D. Tex. Mar. 13, 2020), ECF No. 68 (“Solas’s Op. Claim Construction Br.”)
1009	Defendants’ Opening Claim Construction Brief, <i>Solas OLED Ltd. v. LG Display Co.</i> , No. 6:19-cv-00236-ADA (W.D. Tex. Mar. 13, 2020), ECF No. 67 (“Defendants’ Op. Claim Construction Br.”)
1010	Claim Construction Order, <i>Solas OLED Ltd. v. LG Display Co.</i> , No. 6:19-cv-00236-ADA (W.D. Tex. June 9, 2020), ECF No. 82 (“Markman Order”)
1011	RESERVED
1012	Joint Revised List of Terms/Constructions, <i>Solas OLED Ltd. v. LG Display Co.</i> , No. 6:19-cv-00236-ADA (W.D. Tex. Mar. 13, 2020), ECF No. 67-28 (“Parties’ Exchange of Constructions”)

Ex. No.	Description
1013	Defendants LG Display Co., Ltd., LG Electronics, Inc. and Sony Corporation's Invalidity Contentions, <i>Solas OLED Ltd. v. LG Display Co.</i> , No. 6:19-cv-00236-ADA (W.D. Tex. Jan. 24, 2020)
1014	U.S. Patent No. 6,724,149 ("Komiya")
1015	U.S. Patent No. 6,281,552 ("Kawasaki")
1016	U.S. Patent No. 7,115,956 ("Nakamura")
1017	U.S. Patent Application Publication No. 2004/0113873 ("Shirasaki")
1018	Raymond A. Serway, <i>Principles of Physics</i> (2nd ed. 1998) (excerpts) ("Serway")
1019	U.K. Patent Application No. GB 2,389,952 ("Routley")
1020	U.S. Patent No. 6,809,706 ("Shimoda")
1021	U.S. Patent Application Publication No. 2002/0101172 ("Bu")
1022	Complaint for Patent Infringement Against Samsung Electronics Co., Ltd., Samsung Electronics America, Inc., and Samsung Display Co., Ltd., <i>Solas OLED Ltd. v. Samsung Electronics Co., Ltd.</i> , No. 2:20-cv-307 (E.D. Tex. Sept. 15, 2020)
1023	Complaint for Patent Infringement Against Dell Technologies Inc., <i>Solas OLED Ltd. v. Dell Technologies Inc.</i> , No. 6:20-cv-841 (W.D. Tex. Sept. 15, 2020)
1024	Complaint for Patent Infringement Against Motorola Mobility LLC, <i>Solas OLED Ltd. v. Motorola Mobility LLC</i> , No. 6:20-cv-842 (W.D. Tex. Sept. 15, 2020)
1025	Complaint Under Section 337 of the Tariff Act of 1930, as Amended, <i>Certain Active Matrix OLED Display Devices and Components Thereof</i> , Inv. No. 337-TA-1225 (U.S.I.T.C. Sept. 14, 2020) and related submissions

Ex. No.	Description
1026	Complainant's Unopposed Motion to Terminate the Investigation in its Entirety Based on Withdrawal of Complaint and to Stay the Procedural Schedule and Request for Expedited Treatment, <i>Certain Active Matrix OLED Display Devices and Components Thereof</i> , Inv. No. 337-TA-1225 (U.S.I.T.C. Nov. 6, 2020)
1027	Lex Machina report of civil cases pending before Judge Alan D. Albright
1028	U.S. District Court for the Western District of Texas report of pending criminal cases
1029	Scott McKeown, <i>District Court Trial Dates Tend to Slip After PTAB Discretionary Denials</i> , Ropes & Gray: Patents Post-Grant (July 24, 2020), https://www.patentspostgrant.com/district-court-trial-dates-tend-to-slip-after-ptab-discretionary-denials/
1030	JB Smith, <i>COVID-19 Cases Now Consume Almost One-Fifth of Waco-Area Hospital Capacity</i> , Waco Tribune-Herald (Dec. 1, 2020), wacotrib.com/news/local/covid-19-cases-now-consume-almost-one-fifth-of-waco-area-hospital-capacity/article_eed6bd1a-3439-11eb-96bf-5b2ac0e9563b.html
1031	Transcript of Motion Hearing Proceedings (Via Zoom Conference) Before the Honorable Theresa C. Buchanan, United States District Court Magistrate Judge, <i>RAI Strategic Holdings, Inc. v. Altria Client Services, LLC</i> , No. 1:20-cv-393, (E.D. Va. Dec. 4, 2020)
1032	Excerpt of e-mail exchange between counsel for LG Display Co., Ltd. and counsel for Solas OLED Ltd. (Oct. 27, 2020 – Nov. 2, 2020)
1033	Letter from counsel for LG Display Co., Ltd. to counsel for Solas OLED Ltd. (Dec. 10, 2020)
1034	Tenth Supplemental Order Regarding Court Operations Under the Exigent Circumstances Created by the COVID-19 Pandemic (W.D. Tex. Nov. 18, 2020)

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.