

**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

JOINT REVISED LIST OF TERMS/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”) and Plaintiff Solas OLED Ltd. (“Solas” or “Plaintiff”) (collectively, the “Parties”) met and conferred to narrow the terms in dispute and regarding a joint revised list of terms/constructions.

Plaintiff and Defendants hereby identify the following terms with agreed constructions, and disputed terms and constructions that expect to be argued in the Parties’ Opening Claim Construction Briefs. The parties reserve the right to further meet and confer, and narrow disputes consistent with the Court’s Scheduling Order and procedures.

I. U.S. PATENT NO. 7,907,137 (“137 PATENT”)

A. Agreed Terms

Claim Terms	Asserted Claim(s)	Agreed Construction
“luminance gradation”	10, 36	light emitting level

B. Disputed Terms

Claim Terms	Asserted Claim(s)	Solas's Construction	Defendants' Construction
"a gradation current having a current value"	10, 36	"gradation current" means "current conveying information about a level"	an actual current (not voltage) with a value corresponding to a luminance level
"gradation signal"	10, 15, 36, 37, 39	signal conveying information about a level	a gradation current with a current value sent to a pixel to set a luminance gradation
"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	not indefinite	indefinite
"... through a data line ... through the data line ... through the data line"	10, 36	plain and ordinary meaning. "a data line" means "one or more data lines." The antecedent basis for "the data line" is "a data line."	the gradation current is supplied, the threshold voltage is detected, and the compensation voltage is applied through the same data line
"before"	10	plain and ordinary meaning	earlier in time (not at the same time)
"after"	36	plain and ordinary meaning	later in time (not at the same time)

II. U.S. PATENT NO. 7,432,891 (“891 PATENT”)**A. Disputed Terms**

Claim Terms	Asserted Claim(s)	Solas’s Construction	Defendants’ 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 voltage signal which is dependent on a current measuring result and a voltage comparison”	1, 3	Plain and ordinary meaning. The claimed “providing” by the current measuring- and voltage regulating circuit (“said current measuring- and voltage regulating circuit providing to the data conductor a voltage signal which is dependent on a current measuring result and a voltage comparison”) is not required to occur during driving of the third thin film transistor’s gate.	The claimed “providing” by the current measuring- and voltage regulating circuit (“said current measuring- and voltage regulating circuit providing to the data conductor a voltage signal which is dependent on a current measuring result and a voltage comparison”) is required to occur during driving of the third thin film transistor’s gate.
“current measuring”	1, 3	plain and ordinary meaning	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 and physically located on the same side of the layers of said light emitting diode	wherein all above mentioned elements of the driving circuit are electrically connected to the anode or cathode of said light emitting diode

III. U.S. PATENT NO. 7,573,068 (“068 PATENT”)**A. Agreed Terms**

Claim Terms	Asserted Claim(s)	Agreed Construction
“supply lines”	1, 13	conductive lines supplying current or voltage

B. Disputed Terms

Claim Terms	Asserted Claim(s)	Solas's Construction	Defendants' 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 or direction of said plurality of supply lines	formed on said plurality of supply lines over the length of said plurality of supply lines
“connected to said plurality of supply lines along said plurality of supply lines”	13	connected to said plurality of supply lines over the length or direction of said plurality of supply lines	connected to said plurality of supply lines over the length of said plurality of supply lines
“patterned”	1, 13	formed in one or more layers	formed in a single layer
“patterned together”	1, 13	patterned to fit together	patterned at the same time
“signal lines”	1, 13	conductive lines supplying signals	conductive lines supplying a value corresponding to a luminance level
“feed interconnections”	1, 10, 12, 13, 17	conductive structures in a layer or layers that provide connections to a source that supplies voltage and/or current	conductive structures in a layer or layers different from the gates, sources and drains that provide connections to a source that supplies voltage and/or current

Dated: March 6, 2020

Respectfully Submitted

/s/ Philip X. Wang

Marc Fenster

CA State Bar No. 181067

Reza Mirzaie

CA State Bar No. 246953

Neil A. Rubin

CA State Bar No. 250761

Philip X. Wang

CA State Bar No. 262239

RUSS AUGUST & KABAT

12424 Wilshire Boulevard, 12th Floor

Los Angeles, CA 90025

Telephone: 310-826-7474

Email: mfenster@raklaw.com

Email: rmirzaie@raklaw.com

Email: nrubin@raklaw.com

Sean A. Luner

CA State Bar No. 165443

Gregory S. Dovel

CA State Bar No. 135387

Jonas B. Jacobson

CA State Bar No. 269912

DOVEL & LUNER, LLP

201 Santa Monica Blvd., Suite 600

Santa Monica, CA 90401

Telephone: 310-656-7066

Email: sean@dovel.com

Email: greg@dovel.com

Email: jonas@dovel.com

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.