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September 14, 2020

## VIA ELECTRONIC FILING

The Honorable Lisa R. Barton Secretary to the Commission **U.S. INTERNATIONAL TRADE COMMISSION** 500 E Street, SW, Room 112-A Washington, DC 20436

Re: Certain Active Matrix OLED Display Devices and Components Thereof, Inv. No. 337-TA-\_\_\_\_

Dear Secretary Barton:

In accordance with the Commission's Temporary Change to the Filing Procedures, dated March 16, 2020, enclosed for filing on behalf of Complainant Solas OLED Ltd. ("Solas" or "Complainant") are the following documents in support of Solas's request that the Commission commence an investigation pursuant to Section 337 of the Tariff Act of 1930, as amended:

1. One (1) electronic copy of the verified Non-Confidential Complaint and the Public Interest Statement. (19 C.F.R. §§ 210.8(a)(1)(i) and 210.8(b));

2. One (1) electronic copy of the Confidential Complaint and the Public Interest Statement. (19 C.F.R. §§ 210.8(a)(1)(ii) and 210.8(b));

3. One (1) electronic copy of Solas' letter and certification requesting confidential treatment for the information contained in the Confidential Exhibit Nos. 8C, 9C, 32C, and 33C. (19 C.F.R. §§ 210.5(d) and 201.6(b));

4. One (1) electronic copy of the accompanying Non-Confidential Exhibits and public version of the Confidential Exhibits. (19 C.F.R. § 210.8(a)(1)(i));

5. One (1) electronic copy of Confidential Exhibits 8C, 9C, 32C, and 33C. (19 C.F.R.  $\S$  210.8(a)(1)(ii) and 201.6(c));

6. One (1) electronic copy of the certified versions of United States Patent No. 8,139,007 ("the '007 Patent"); United States Patent No. 7,573,068 ("the '068 Patent"); and United States Patent No. 7,868,880 ("the '880 Patent) (collectively, the "Asserted Patents") cited in the Complaint as Exhibits 1–3. (19 C.F.R. §§ 210.12(a)(9)(i));

LG Display Exhibit 1025 The Honorable Lisa R. Barton September 14, 2020 Page 2

7. One (1) electronic copy of the certified versions of each of the assignments for the Asserted Patents cited in the Complaint as Exhibits 4-7. (19 C.F.R. \$\$ 210.12(a)(9)(ii));

8. One (1) electronic copy of the certified versions of the prosecution histories for the Asserted Patents included as Appendices A1, B1, and C1 to the Complaint. (19 C.F.R. \$ 210.12(c)(1));

9. One (1) electronic copy of the patent and technical reference documents identified in each of the prosecution histories of the Asserted Patents, included in the Complaint as Appendices A2, B2, and C2. (19 C.F.R. \$ 210.12(c)(2)).

Please contact me with any questions regarding this submission. Thank you for your attention to this matter.

Respectfully Submitted,

Evan H. Langdon

*Counsel for Complainant Solas OLED Ltd.* 

Enclosures

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September 14, 2020

## VIA ELECTRONIC FILING

## **<u>REQUEST FOR CONFIDENTIAL TREATMENT</u>**

The Honorable Lisa R. Barton Secretary to the Commission **U.S. INTERNATIONAL TRADE COMMISSION** 500 E Street, SW, Room 112-A Washington, DC 20436

Re: Certain Active Matrix OLED Display Devices and Components Thereof, Inv. No. 337-TA-\_\_\_\_

Dear Secretary Barton:

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Pursuant to Commission Rules 210.5(d) and 201.6(b)(1), Complainant Solas OLED Ltd. ("Solas" or "Complainant") respectfully requests confidential treatment of the business information contained in Exhibit Nos. 8C, 9C, 32C, and 33C ("Conf. Exhibits") to the Verified Complaint.

The information contained in the Conf. Exhibits qualifies as confidential business information pursuant to Commission Rule 201.6(a) because:

- It is not available to the general public;
- The disclosure of such information would cause substantial harm to Solas and to the competitive position of Solas; and
- Unauthorized disclosure of the information could impair the Commission's ability to obtain information necessary to perform its statutory function.

Please contact me with any questions regarding this submission. Thank you for your attention to this matter.

The Honorable Lisa R. Barton September 14, 2020 Page 2

Respectfully Submitted,

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Evan H. Langdon

*Counsel for Complainant Solas OLED Ltd.* 

#### UNITED STATES INTERNATIONAL TRADE COMMISSION WASHINGTON, D.C.

In the Matter of

#### CERTAIN ACTIVE MATRIX OLED DISPLAY DEVICES AND COMPONENTS THEREOF

Investigation No. 337-TA-\_\_\_\_

#### **CERTIFICATION REGARDING REQUEST FOR CONFIDENTIAL TREATMENT**

I, Evan H. Langdon, counsel for Complainant Solas OLED Ltd. ("Solas" or "Complainant"), declare as follows:

I have reviewed Solas' Verified Complaint and Confidential Exhibit Nos. 8C, 9C,
32C, and 33C ("Conf. Exhibits") filed concurrently with this Certification.

2. Confidential Exhibit No. 8C is a list of Complainant's licensees, the identity of which is regarded as Complainant's confidential business information.

3. Confidential Exhibit No. 9C is the licensing agreement between Solas and its licensee, eMagin Corporation ("eMagin"). The licensing agreement between the Parties contains confidential business information, including confidential information related to the licensing terms between the Parties, which is not available for public dissemination. Disclosure of this information to the public would cause substantial harm to Solas, its competitive position, and its ability to negotiate future licensing agreements.

4. Confidential Exhibit No. 32C is an agreement between Solas and its licensee, eMagin. The agreement between the Parties contains confidential business information, including confidential information related to terms of the agreement between the Parties, which is not available for public dissemination. Disclosure of this information to the public would cause substantial harm to Solas and its competitive position.

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