
From: Lee, Joseph (OC)
Sent: Monday, November 02, 2020 3:24 PM
To: Philip Wang
Cc: Tzeng, Lin (Bay Area); j david@lerner david.com; r roeser@haltomdoan.com; Jennifer Doan; vsharma@lerner david.com; g gewirtz@lerner david.com; #C-M LGD SOLAS - LW TEAM; Josh Thane; Cole Riddell; Davis, Blake (Bay Area); solas@raklaw.com
Subject: RE: Solas OLED Ltd. v. LG Display Co., Ltd. et al.

Philip,

I still have not received a response to my email below. Please let us know by COB today whether Solas will agree to Defendants' proposal. If not, please let us know when you are available for a meet and confer tomorrow. Thanks.

Joe

From: Lee, Joseph (OC)
Sent: Thursday, October 29, 2020 6:10 PM
To: 'Philip Wang' <pwang@raklaw.com>
Cc: Tzeng, Lin (Bay Area) <Linfong.Tzeng@lw.com>; j david@lerner david.com; r roeser@haltomdoan.com; Jennifer Doan <jdoan@haltomdoan.com>; vsharma@lerner david.com; g gewirtz@lerner david.com; #C-M LGD SOLAS - LW TEAM <LGDSOLAS.LWTEAM@lw.com>; Josh Thane <jthane@haltomdoan.com>; Cole Riddell <criddell@haltomdoan.com>; Davis, Blake (Bay Area) <Blake.Davis@lw.com>; solas@raklaw.com
Subject: RE: Solas OLED Ltd. v. LG Display Co., Ltd. et al.

Philip,

While Defendants disagree with Solas's characterization of Defendants' invalidity contentions, in an effort at compromise, Defendants are willing to identify no more than 15 references on which Solas will need to provide a more detailed response to Defendants' interrogatory no. 14 if Solas will commit to providing such a response by November 6th. Note that this identification of references is done only for purposes of Solas's supplementation of interrogatory no. 14 and otherwise has no binding effect on Defendants. Please confirm whether Solas will agree to commit to supplementation and we can send you the list of references to focus on for the supplementation. If not, please let me know if Solas is available tomorrow (October 30th) for a meet and confer regarding the issue.

Joe

From: Philip Wang <pwang@raklaw.com>
Sent: Wednesday, October 28, 2020 6:48 PM
To: Lee, Joseph (OC) <Joseph.Lee@lw.com>
Cc: Tzeng, Lin (Bay Area) <Linfong.Tzeng@lw.com>; j david@lerner david.com; r roeser@haltomdoan.com; Jennifer Doan <jdoan@haltomdoan.com>; vsharma@lerner david.com; g gewirtz@lerner david.com; #C-M LGD SOLAS - LW TEAM <LGDSOLAS.LWTEAM@lw.com>; Josh Thane <jthane@haltomdoan.com>; Cole Riddell <criddell@haltomdoan.com>; Davis, Blake (Bay Area) <Blake.Davis@lw.com>; solas@raklaw.com
Subject: Re: Solas OLED Ltd. v. LG Display Co., Ltd. et al.

Joe,

LG Display
Exhibit 1020

Thanks for your email. Solas reserves the right to supplement its rog responses during discovery, esp. as new information/discovery is provided. As to Defendants' rog 14 on validity, we think it prematurely calls for expert opinions. It's also overbroad and unduly burdensome, as Defendants' invalidity contentions are vague and ambiguous and purport to assert an unbounded number of references/combinations. If you're willing to appropriately narrow the scope of this request, we can consider further.

Philip

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On Oct 27, 2020, at 8:32 PM, Joseph.Lee@lw.com wrote:

Philip,

On our October 21st call, Solas told us it would get back to us by October 26th regarding supplementing its interrogatories, including in particular interrogatory no. 14 asking for the bases for Solas's contention that the asserted patents are valid. As explained a number of times, including in my email below, Solas's responses are insufficient and need to be supplemented. The only supplemental interrogatory response Solas has served since that meeting was to interrogatory no. 9 and does not address the deficiencies previously raised. Please confirm that Solas will supplement its responses by noon Pacific tomorrow. Otherwise, we understand from Solas's lack of supplementation that the parties are at an impasse.

Joe