

Douglas E. Lumish  
Direct Dial: 650.463.2633  
doug.lumish@lw.com

140 Scott Drive  
Menlo Park, California 94025  
Tel: +1.650.328.4600 Fax: +1.650.463.2600  
www.lw.com

# LATHAM & WATKINS LLP

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## VIA EMAIL

Philip X. Wang  
Russ August & Kabat  
12424 Wilshire Boulevard  
Twelfth Floor  
Los Angeles, California 90025  
pwang@raklaw.com

Re: *Solas OLED Ltd. v. LG Display Co., Ltd., et al.*, Case No. 6:19-cv-00236-ADA

Dear Philip:

Defendants LG Display Co., Ltd., LG Display America, Inc., LG Electronics Inc., LG Electronics USA, Inc., Sony Electronics Inc., and Sony Corporation hereby stipulate that, if the Patent Trial and Appeal Board (“PTAB”) institutes the pending *inter partes* review petition in IPR2020-01238 challenging the patentability of claims 1, 5, 9-13, and 17 of U.S. Patent Number 7,573,068 then Defendants will not pursue the instituted invalidity grounds in the above-captioned litigation, 6:19-cv-00236. For convenient reference, the proposed invalidity grounds in IPR2020-01238 are:

- Claims 1, 5, 10, 11 and 13 are unpatentable under 35 U.S.C. § 102 over Shin (WO 2004/090853).
- Claim 13 is unpatentable under 35 U.S.C. § 103 over Shin.
- Claims 1, 5, 9-13 and 17 are unpatentable under 35 U.S.C. § 103 over Shin and Hector (WO 03/079442).

To avoid any doubt, if the PTAB declines institution of IPR2020-01238, Defendants reserve the right to pursue these invalidity grounds in the parallel litigation.

Best Regards,

/s/ Douglas E. Lumish

Douglas E. Lumish  
of LATHAM & WATKINS LLP

LG Display  
Exhibit 1000