

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; LG DISPLAY AMERICA, INC., a California corporation; LG ELECTRONICS USA, INC., a Delaware corporation; SONY CORPORATION, a Japanese corporation; and SONY ELECTRONICS INC., a Delaware Corporation,

Defendants.

CASE NO. 6:19-CV-00236-ADA

JURY TRIAL DEMANDED

**CORRECTED EXPERT REPORT OF DOUGLAS R. HOLBERG REGARDING
INVALIDITY OF U.S. PATENT NOS. 7,432,891, 7,573,068, AND 7,907,137**

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I. INTRODUCTION

1. I am more than eighteen years of age, and I am a citizen of the United States, currently residing in Texas.

2. I have been retained by counsel for Defendants to provide my opinions as to the invalidity of asserted claims 10, 11, 15, 36, 37, and 39 of U.S. Patent No. 7,907,137 (the “137 patent”), claims 1 and 3 of U.S. Patent No. 7,432,891 (the “891 patent”), and claims 1, 5, 10, and 13 of U.S. Patent No. 7,573,068 (the “068 patent”) (collectively, the “Asserted Claims” of the “Asserted Patents”), asserted by Solas OLED Ltd. (“Solas”) in this action. Based on my analysis and investigation, I have reached certain conclusions and developed certain opinions on the issues that I discuss in this report.

3. My opinions expressed herein are based on review and analysis of certain information obtained in connection with my work on this matter, together with my training, education, and experience. The opinions expressed herein are my own.

4. In my analysis, I considered the Asserted Patents and their file histories, the prior art, my experience in the relevant field and industry, as well as other documentation discussed below.

II. QUALIFICATIONS AND COMPENSATION

5. In formulating my opinions, I have relied upon my knowledge, training, and experience in the relevant art. My qualifications are stated more fully in my curriculum vitae, which has been provided as Exhibit A. Here, I provide a brief summary of my qualifications.

6. My education includes a B.S. in Electrical Engineering from Texas A&M University in 1977, followed by a M.S. in Electrical Engineering from the University of Texas in 1989. I earned a Ph.D. in Electrical Engineering from the University of Texas in 1992.

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