# UNITED STATES PATENT AND TRADEMARK OFFICE

# BEFORE THE PATENT TRIAL AND APPEAL BOARD

APPLE INC. Petitioner

v.

SOLAS OLED LTD. Patent Owner

Case No. IPR2020-01546 U.S. Patent No. 7,573,068

# PETITION FOR *INTER PARTES* REVIEW OF U.S. PATENT NO. 7,573,068

**DOCKET A L A R M** Find authenticated court documents without watermarks at <u>docketalarm.com</u>.

# IPR2020-01546 U.S. Patent No. 7,573,068

# **TABLE OF CONTENTS**

I.	INTRODUCTION1		
III.	SUMMARY OF THE '068 PATENT1		
	A. B. C.	THE '068 PATENT'S ALLEGED INVENTION	9 11
IV.	D.	A Person Having Ordinary Skill in the Art UIREMENTS FOR IPR UNDER 37 C.F.R. § 42.104	
1 V .	A. B.	STANDING UNDER 37 C.F.R. § 42.104(A) CHALLENGE UNDER 37 C.F.R. § 42.104(B) AND RELIEF REQUESTED CLAIM CONSTRUCTION UNDER 37 C.F.R. § 42.104(B)(3)	14
V.	C. THE	CLAIM CONSTRUCTION UNDER 37 C.F.R. § 42.104(B)(3)	
	A.	GROUND 1: <i>Shirasaki</i> in View of <i>Childs</i> Renders Obvious Claims 1, 5, 6, 8-13, and 17	
VI.	DIS	CRETION CONSIDERATIONS	59
	A. B.	THE <i>General Plastics</i> Factors Favor Institution The <i>Fintiv</i> Factors Strongly Favor Institution	
VII.	CON	CLUSION	68
VIII.	MA	NDATORY NOTICES UNDER 37 C.F.R. § 42.8(A)(1)	70
	A. B. C.	REAL PARTY-IN-INTEREST Related Matters Lead and Back-Up Counsel	70

DOCKET

## I. INTRODUCTION

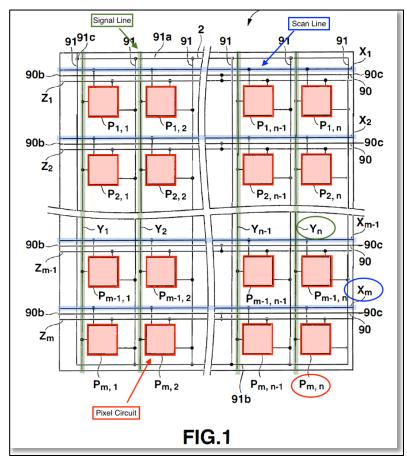
Petitioner Apple Inc. ("Petitioner") requests an *Inter Partes* Review ("IPR") of claims 1, 5, 6, 8-13, and 17 (the "Challenged Claims") of U.S. Patent No. 7,573,068 ("the '068 Patent").

## III. SUMMARY OF THE '068 PATENT

## A. The '068 Patent's Alleged Invention

The '068 Patent generally describes a specific circuit arrangement and manufacturing method for organic EL display panels. '068 Patent (Ex. 1001), Abstract, 1:16-20. The subject display panel is comprised of pixel circuits, each of which is located at the intersection of perpendicular signal and scan lines. *Id* at 6:1-2, 6:50-51. Figure 1 below illustrates the display panel array, comprising a plurality of signal lines  $Y_n$  (green) crossing a plurality of scan lines  $X_m$  (blue ) with a pixel circuit  $P_{m,n}$  (red) at each intersection:

IPR2020-01546 U.S. Patent No. 7,573,068



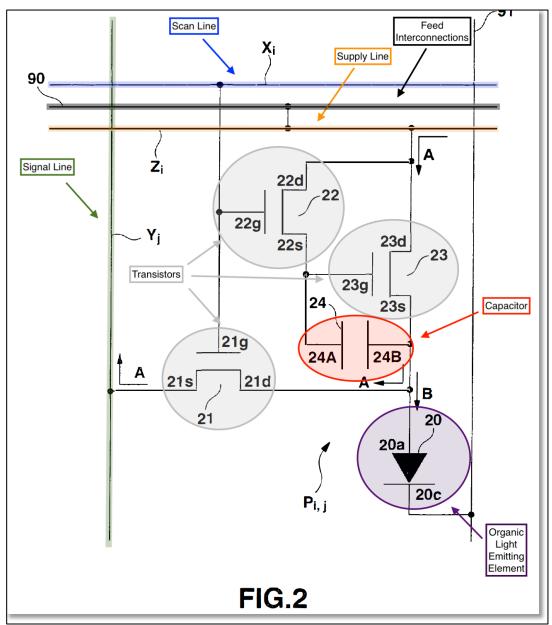
Id. at Fig. 1 (annotated).

# Circuit Layout

Δ

Each pixel circuit is comprised of three transistors, a capacitor, and an organic light-emitting element. *Id.* at 6:63-65. Figure 2 below illustrates the general arrangement of the '068 Patent's pixel circuit:

IPR2020-01546 U.S. Patent No. 7,573,068



*Id.* at Figure 2 (annotated). The circuit layout is designed to optimize current delivery to each of the organic light-emitting elements across the display in accordance with the driving method described below.

# DOCKET A L A R M



# 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.