

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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SAMSUNG DISPLAY CO., LTD.,  
SAMSUNG ELECTRONICS CO., LTD., and  
SAMSUNG ELECTRONICS AMERICA, INC.,  
Petitioners,

v.

SOLAS OLED LTD.,  
Patent Owner.

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Case No. IPR2021-00591  
U.S. Patent No. 7,868,880

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EXPERT DECLARATION OF THOMAS CREDELLE

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## **I. BACKGROUND**

1. I have been retained by Patent Owner Solas OLED Ltd. (“Solas” or “Patent Owner”) to provide my opinions with respect to their Response to the Petition for Inter Partes Review in IPR2021-00591 (“Petition”) as to U.S. Patent No. 7,868,880 (“’880 patent,” Exhibit 1001), brought by Petitioners Samsung Display Co., Ltd., Samsung Electronics Co., Ltd., and Samsung Electronics America, Inc. (“Samsung” or “Petitioners”). I have no interest in the outcome of this proceeding and my compensation is in no way contingent on my providing any particular opinions.

2. As a part of this engagement, I have also been asked to provide my technical review, analysis, insights, and opinions regarding the Petition and the supporting declaration of Dr. Miltiadis Hatalis (“Hatalis Declaration” or Ex. 1003) with respect to the challenged claims of the ’880 patent.

3. The statements made herein are based on my own knowledge and opinions.

## **II. EDUCATIONAL AND EMPLOYMENT BACKGROUND**

4. My complete qualifications and professional experience are described in my Curriculum Vitae, a copy of which can be found in Ex. 2002. The following is a brief summary of my relevant qualifications and professional experience.

5. As shown in my curriculum vitae, I have devoted my career to the research and development and product engineering of flat panel displays and materials/optics/electronics for flat panel displays and touch sensors. I have over 20 years of involvement in active matrix LCD R&D, starting in 1983 at RCA Labs and continuing at GE. I led the product development of active matrix LCDs for notebook computers at Apple in the early 90's and had close collaboration with many LCD developers in Asia. Later in my career, I made significant contributions to the design and implementation of new pixel architectures for LCDs and OLEDs while at Clairvoyante; both efforts involved TFT design modifications to achieve the desired goals of high pixel transmission and reduced circuit complexity. More recently, I have been involved in several patent litigation cases which required a detailed knowledge of TFT design, materials, and processing.

6. I am currently the President of TLC Display Consulting and split my time between technical consulting and patent litigation support.

7. I received my M.S. degree in Electrical Engineering from the Massachusetts Institute of Technology in 1970, with an emphasis on Electro Optics and Solid-State Materials. I received my B.S. degree in Electrical Engineering in 1969 from Drexel University.

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