

UNITED STATES PATENT AND TRADEMARK OFFICE

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**BEFORE THE PATENT TRIAL AND APPEAL BOARD**

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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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**PETITIONERS' REPLY**

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**LIST OF EXHIBITS**

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Ex-1004	Curriculum Vitae of Dr. Miltiadis Hatalis
Ex-1005	Prosecution History of U.S. Patent No. 7,868,880
Ex-1006	U.S. Patent Pub. No. 2005/0083270 (“Miyazawa”)
Ex-1007	U.S. Patent Pub. No. 2003/095087 (“Libsch”)
Ex-1008	WIPO Pub. No. WO 2004/040543 (“Morosawa”)
Ex-1009	WIPO Pub. No. WO 2004/086347 (“Shirasaki”)
Ex-1010	U.S. Patent No. 7,564,433 (“Hector”)
Ex-1011	U.S. Patent Pub. No. 2003/0197664 (“Koyama”)
Ex-1012	<i>reserved</i>
Ex-1013	Public Hearing Transcript USITC Hearing 337-TA-1243 (excerpts)
Ex-1014	Deposition Transcript of Thomas Credelle

## I. INTRODUCTION

Solas challenges the prior art's disclosure of only a few limitations that cut across several of the '880 Patent's 40 claims. But Solas's distinctions are based on its expert Mr. Credelle's misreading the prior art and on his apparent insistence that the prior art must meet a far higher standard of disclosure than does the '880 Patent itself. As Mr. Credelle's deposition made clear, the proper application of the prior art demonstrates all 40 claims of the '880 Patent are invalid.

## II. CLAIM CONSTRUCTION

Certain terms of the '880 Patent were construed in the related ITC case. POR, 12-13; Ex-2004. Mr. Credelle confirmed that whether one applied plain meaning or the constructions from the ITC case would make no difference. Ex-1014, 18:5-12; Ex-2001, ¶71.

## III. ANTICIPATION AND SINGLE-REFERENCE OBVIOUSNESS GROUNDS

Solas challenges only a few claim elements in its POR. But each is clearly disclosed by both Miyazawa and Morosawa, as described below.

### A. "Vicinity of Intersections" (Limitations 1.1, 2P, 3.1, 25P)

Each independent claim requires "display pixels" be "arranged . . . in vicinities of [respective] intersections of" scanning lines and data lines. Solas incorrectly argues this limitation is not disclosed by either Morowasa or Miyazawa. POR, 14, 18, 21, 29, 34, 49, 53, 63. Mr. Credelle asserts prior-art

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