# UNITED STATES PATENT AND TRADEMARK OFFICE

### BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAMSUNG ELECTRONICS CO., LTD.; AND SAMSUNG ELECTRONICS AMERICA, INC., Petitioner

v.

SOLAS OLED LTD. Patent Owner.

DECLARATION OF DR. BENJAMIN B. BEDERSON IN SUPPORT OF PETITION FOR *INTER PARTES* REVIEW OF U.S. PATENT NO. 8,526,767



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	D.	West	terman (Ex-1008)	46		
X.	DETAILED EXPLANATION OF THE UNPATENTABILITY GROUNDS					
	A.	Claims 1 and 9-14 are rendered obvious by Baltierra alone (Ground 1) or Baltierra in view of Katou (Ground 2)				
		1.	A POSITA would have been motivated to combine the teachings of Baltierra and Katou, and would have had a reasonable expectation of success in doing so	49		
		2.	Independent Claims 1 and 12-14	49		
		3.	Dependent Claims 9-11	65		
	B.	Claims 2-8 are rendered obvious by Baltierra in view of Katou and Warren (Ground 3)				
		1.	A POSITA would have been motivated to combine the teachings of Baltierra with Katou and Warren, and would have had a reasonable expectation of success in doing so	67		
		2.	Dependent Claims 2-8	69		
	C.	Claims 1 and 9-14 are rendered obvious by Westerman alone (Ground 4) or Westerman in view of Katou (Ground 5)				
		1.	A POSITA would have been motivated to combine the teachings of Westerman and Katou, and would have had a reasonable expectation of success in doing so	76		
		2.	Independent Claims 1 and 12-14	77		
		3.	Dependent Claims 9-11	88		
	D.	Claims 2-8 are rendered obvious by Westerman in view of Katou and Warren (Ground 6)				
		1.	A POSITA would have been motivated to combine the teachings of Westerman with Katou and Warren, and would have had a reasonable expectation of success in	0.0		
			doing so	90		



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	2.	Dependent Claims 2-8	92
ΧI	CONCLUS	SION	90



1. I, Dr. Benjamin B. Bederson, declare as follows:

### I. INTRODUCTION

- 2. I have been retained by Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. (collectively, "Samsung" or "Petitioner") as an independent expert consultant in this *inter partes* review ("IPR") proceeding before the United States Patent and Trademark Office ("PTO").
- 3. I have been asked by Samsung Counsel ("Counsel") to consider whether certain references disclose, teach and/or suggest the features recited in Claims 1-14 of U.S. Patent No. 8,526,767 ("the '767 Patent") (Ex-1001)<sup>1</sup>. My opinions and the bases for my opinions are set forth below.
- 4. I am being compensated at my ordinary and customary consulting rate for my work, which is \$600 per hour. My compensation is in no way contingent on the nature of my findings, the presentation of my findings in testimony, or the outcome of this or any other proceeding. I have no other financial interest in this proceeding.

### II. BACKGROUND AND QUALIFICATIONS

5. All of my opinions stated in this Declaration are based on my own personal knowledge and professional judgment. In forming my opinions, I have

<sup>&</sup>lt;sup>1</sup> Where appropriate, I refer to exhibits that I understand are attached to the petition for IPR of the '767 Patent.



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