

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.,  
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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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

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<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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