

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION

Solas OLED Ltd., an Irish corporation,

Plaintiff,

vs.

Apple Inc., a California corporation;

Defendant.

CASE NO. 6:19-cv-00537

**Complaint for Patent
Infringement**

JURY DEMANDED

Complaint for Patent Infringement

Plaintiff Solas OLED Ltd. (“Solas”) files this complaint against Defendant Apple Inc. (“Apple”), alleging infringement of U.S. Patent Nos. 6,072,450, 7,446,338, and 7,573,068 (“Patents-in-Suit”). The accused products are Apple products with organic light-emitting diode (“OLED”) displays.

Plaintiff Solas OLED and the Patents-in-Suit.

1. Plaintiff Solas is a technology licensing company organized under the laws of Ireland, with its headquarters at 4-5 Burton Hall Road, Sandyford, Dublin 18.
2. Solas is the owner of U.S. Patent No. 6,072,450, entitled “Display Apparatus,” which issued June 6, 2000 (the “’450 patent”). A copy of the ’450 patent is attached to this complaint as Exhibit 1.

3. Solas is the owner of U.S. Patent No. 7,446,338, entitled “Display Panel,” which issued November 4, 2008 (the “’338 patent”). A copy of the ’338 patent is attached to this complaint as Exhibit 2.

4. Solas is the owner of U.S. Patent No. 7,573,068, entitled “Transistor array substrate and display panel,” which issued August 11, 2009 (the “’068 patent”). A copy of the ’068 patent is attached to this complaint as Exhibit 3.

Defendant and the Accused Products.

5. Defendant Apple Inc. is a California corporation with regular and established places of business in this district.

6. The accused products are Apple products with organic light-emitting diode (“OLED”) displays. As illustrative examples, this includes iPhone, Apple Watch, and MacBook Pro models.

Jurisdiction, venue, and joinder.

7. Solas asserts claims for patent infringement against Apple under the patent laws of the United States, including 35 U.S.C. §§ 271 and 281, et seq. The Court has original jurisdiction over Solas’ patent infringement claims under 28 U.S.C. §§ 1331 and 1338(a).

8. The Court has personal jurisdiction over Apple. Apple has regular and established places of business within this district and has committed acts of infringement within this district (e.g., selling and using Accused Products). Apple has established minimum contacts with the State of Texas such that the exercise of jurisdiction over Apple would not offend traditional notions of fair play and substantial justice.

9. Venue is proper in this district under 28 U.S.C. §1400(b) and 28 U.S.C. §§ 1391(c). Apple has regular and established places of business in this district at: 12545 Riata

Vista Cir, Austin, TX 78727; 2901 S. Capital of Texas Hwy, Austin, TX 78746; 3121 Palm Way, Austin, TX 78758; 8401 Gateway Boulevard West, El Paso, TX 79925; 15900 La Cantera Parkway, San Antonio, TX 78256; and 7400 San Pedro Avenue, San Antonio, TX 78216.

Count 1 – Claim for infringement of the '450 patent.

10. Solas incorporates by reference each of the allegations in the above paragraphs and further alleges as follows:

11. On June 6, 2000, the United States Patent and Trademark Office issued U.S. Patent No. 6,072,450, entitled “Display Apparatus.” Ex. 1.

12. Solas is the owner of the '450 patent with full rights to pursue recovery of royalties for damages for infringement, including full rights to recover past and future damages.

13. Each claim of the '450 patent is valid, enforceable, and patent-eligible.

14. Solas and its predecessors in interest have satisfied the requirements of 35 U.S.C. § 287(a) with respect to the '450 patent, and Solas is entitled to damages for Apple's past infringement.

15. Apple has directly infringed (literally and equivalently) and induced others to infringe the '450 patent and, unless enjoined, will continue to do so by making, using, selling, offering for sale, or importing products that infringe the claims of the '450 patent and by inducing others to infringe the claims of the '450 patent without a license or permission from Solas.

Direct Infringement

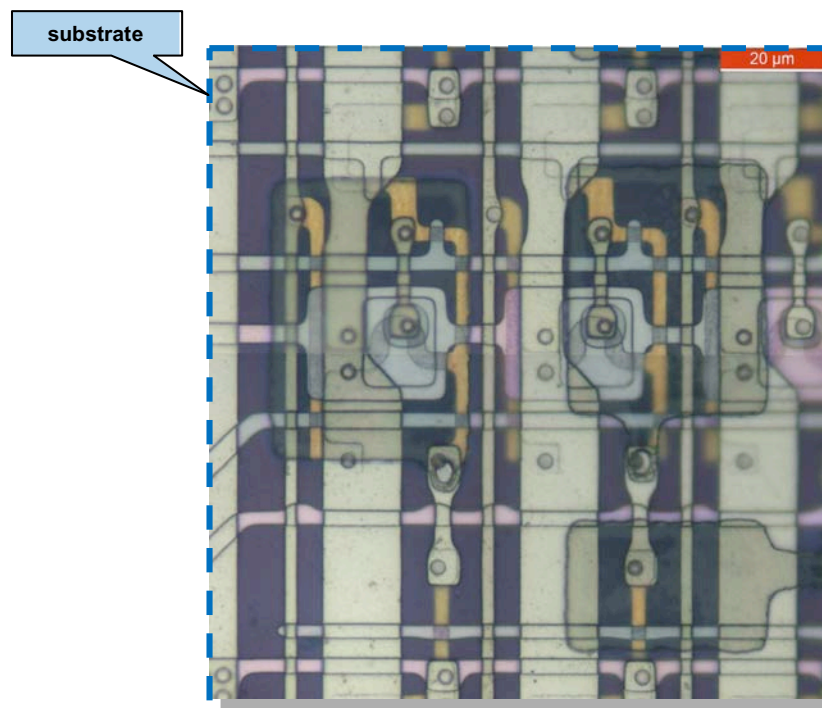
16. Apple has directly infringed (literally and equivalently) at least one claim of the '450 patent by making, using, offering to sell, selling, and importing the Accused Products.

Apple has infringed multiple claims of the '450 patent, including independent claim 1. By way

of example only, the Apple MacBook Pro infringes an exemplary claim of the '450 patent, as in the following description, which Solas provides without the benefit of information about the accused device obtained through discovery. For example, claim 1 claims a display apparatus as follows:

[1a] “a substrate;”

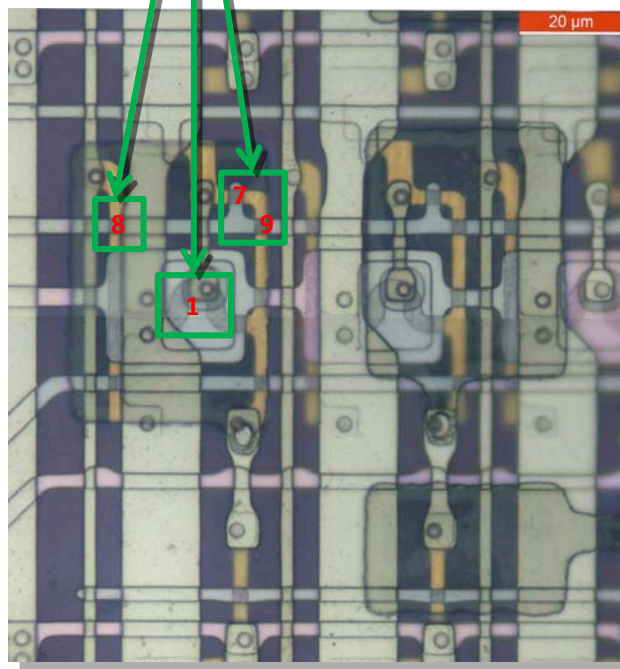
The accused MacBook Pro laptops include Organic Light Emitting Diode (OLED) panels that include a polyimide substrate:



[1b] “active elements formed over said substrate and driven by an externally supplied signal;”

The accused MacBook Pro laptops include active elements formed over the substrate:

active elements formed over said substrate and driven by an externally supplied signal;



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