

Exhibit 18

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

SOLAS OLED LTD.,

Plaintiff,

Case No. 2:19-cv-00152-JRG

v.

SAMSUNG DISPLAY CO., LTD., et al.,

Defendants.

**PLAINTIFF SOLAS OLED LIMITED'S DISCLOSURE OF
ASSERTED CLAIMS AND INFRINGEMENT CONTENTIONS**

Pursuant to P.R. 3-1 and P.R. 3-2, patent owner Solas OLED Limited hereby provides its disclosure of asserted claims and infringement contentions and its accompanying document production. This disclosure is based on the information available to Solas as of the date of this disclosure, before Solas has received any discovery on the design or operation of the defendants' products. Solas reserves the right to amend this disclosure to the full extent permitted under the court's rules and orders.

**I. P.R. 3-1: DISCLOSURE OF ASSERTED CLAIMS AND
INFRINGEMENT CONTENTIONS**

A. P.R. 3-1(a): Asserted Claims

Solas asserts that defendants Samsung Display Co., Ltd.; Samsung Electronics America, Inc.; and Samsung Electronics Co., Ltd. (collectively "Samsung") infringe one or more of the following claims, directly, by inducement, by contributory infringement:

<i>U.S. Patent No.</i>	<i>Asserted Claims</i>
6,072,450	1, 3–6, 8, 12, 13, 15, 16
7,446,338	1, 5, 6, 9, 10
9,256,311	1, 2, 4–8, 10–13, 15, 16, 18–20

Collectively, these three patents are referred to herein as the Asserted Patents, and these claims as the Asserted Claims.

B. P.R. 3-1(b): Accused Instrumentalities of Which Solas Is Aware

In this section, Solas provides lists of accused products that Solas is aware of infringing based upon information presently available to it and its investigation to date. Solas's infringement claims are not limited to these listed products and specifically extend to all products and apparatuses of Samsung similar to the listed products that include the claimed elements. Unless otherwise stated, Solas's infringement assertion apply to all variations, versions, editions, and applications of each of the listed products.

1. U.S. Patent No. 6,072,450

Solas accuses the following Samsung products that it is presently aware of infringing each of the Asserted Claims of the '450 patent:

Samsung Galaxy S4
 Samsung Galaxy S5
 Samsung Galaxy S6
 Samsung Galaxy S6 Edge
 Samsung Galaxy S6 Edge+
 Samsung Galaxy S7
 Samsung Galaxy S7 Edge
 Samsung Galaxy S8
 Samsung Galaxy S8+
 Samsung Galaxy Note 3
 Samsung Galaxy Note 3 Neo
 Samsung Galaxy Note 4

Samsung Galaxy Note Edge
Samsung Galaxy Note 5
Samsung Galaxy Note 7
Samsung Galaxy Note 8

In addition, Solas accuses the Organic Light-Emitting Diode (OLED) displays made and sold by Samsung and utilized in the following third-party products that it is presently aware of infringing each of the Asserted Claims of the '450 patent:

Apple MacBook Pro with OLED Touch Bar
Dell Venue 8 7000 series
Google Pixel
Google Pixel XL
Sony PlayStation VR

The Samsung products—and the Samsung displays contained in the third-party products—in the preceding two lists; all variations, editions, and applications of the foregoing; and all products and apparatuses of Samsung similar to the foregoing that include the claimed elements are the '450 Accused Instrumentalities.

2. U.S. Patent No. 7,446,338

Solas accuses the following Samsung products that it is presently aware of infringing each of the Asserted Claims of the '338 patent:

Samsung Galaxy S4
Samsung Galaxy S8
Samsung Galaxy S8+
Samsung Galaxy S9
Samsung Galaxy S9+
Samsung Galaxy S10
Samsung Galaxy S10+
Samsung Galaxy S10e
Samsung Galaxy S10 5G
Samsung Galaxy Note 8
Samsung Galaxy Note 9
Samsung Galaxy Note 10
Samsung Galaxy Note 10+

In addition, Solas accuses the Organic Light-Emitting Diode (OLED) displays made and sold by Samsung and utilized in the following third-party products that it is presently aware of infringing each of the Asserted Claims of the '338 patent:

- Apple iPhone X
- Apple iPhone XS
- Apple iPhone XS Max
- Apple iPhone 11 Pro
- Apple iPhone 11 Pro Max
- Google Pixel
- Google Pixel XL
- Google Pixel 3 XL
- Google Pixel 3a
- Google Pixel 3a XL

The Samsung products—and the Samsung displays contained in the third-party products—in the preceding two lists; all variations, editions, and applications of the foregoing; and all products and apparatuses of Samsung similar to the foregoing that include the claimed elements are the '338 Accused Instrumentalities.

3. U.S. Patent No. 9,256,311

Solas accuses the following Samsung products that it is presently aware of infringing each of the Asserted Claims of the '311 patent:

- Samsung Galaxy S6 Edge
- Samsung Galaxy S6 Edge+
- Samsung Galaxy S7 Edge
- Samsung Galaxy S8
- Samsung Galaxy S8+
- Samsung Galaxy S9
- Samsung Galaxy S9+
- Samsung Galaxy S10
- Samsung Galaxy S10+
- Samsung Galaxy S10e
- Samsung Galaxy S10 5G
- Samsung Galaxy Note 8
- Samsung Galaxy Note 9
- Samsung Galaxy Note 10
- Samsung Galaxy Note 10+

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