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

SOLAS OLED LTD., *Plaintiff,* v. DELL INC., *Defendant.*	Case No. 6:19-cv-00514-ADA
SOLAS OLED LTD., *Plaintiff,* v. GOOGLE LLC, *Defendant.*	Case No. 6:19-cv-00515-ADA
SOLAS OLED LTD., *Plaintiff,* v. APPLE INC., *Defendant.*	Case No. 6:19-cv-00537-ADA
SOLAS OLED LTD., *Plaintiff,* v. HP INC., *Defendant*	Case No. 6:19-cv-00631-ADA

SOLAS'S RESPONSIVE CLAIM CONSTRUCTION BRIEF[1]

[1] The captioned cases are consolidated for claim construction briefing and hearing. Thus, Solas will file an identical copy of its claim construction papers in those cases.

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TABLE OF EXHIBITS AND ABBREVIATIONS

Ex [2]	Document Description	Abbreviation
1	Declaration of Richard A. Flasck in support of Solas's opening claim construction brief	Flasck. Decl.
2	U.S. Patent No. 6,072,450	'450 patent
3	U.S. Patent No. 7,447,338	'338 patent
4	U.S. Patent No. 7,573,068	'068 patent
5	U.S. Patent No. 7,499,042	'042 patent
6	U.S. Patent No. 7,663,615	'615 patent
7	Parties' joint revised list of terms/constructions served June 12, 2020	Joint Chart
8	The Authoritative Dictionary of IEEE Standards Terms (7th ed. 2000) ("IEEE Dictionary"), definitions of "drain," "source," select," and "substrate"	IEEE Dict.
9	Microsoft Computer Dictionary (3rd ed., 1997), definition of "signal" and 'scan line"	MS Dict.
10	McGraw-Hill Dictionary of Scientific and Technical Terms (4th ed., 1989), definitions of "data transmission line," "source," drain," and "selection circuit"	McGraw-Hill
11	Merriam-Webster Dictionary (avail. at www.merriam-webster.com, accessed May 2020), definitions of "select," "selection," "sequential," and "series."	Merriam-Webster
12	Dictionary.com (avail. at www.dictionary.com, accessed May 2020), definitions of "period," "section," "sequence," and "sequential"	Dictionary.com
13	Oxford Concise Dictionary (12th ed., 2011), definitions of "period" and "section"	Oxford Concise
14	Claim Construction Memorandum and Order from *Solas OLED Ltd. v. Samsung Display Co., Ltd.*, 2:19-CV-00152-JRG, Dkt. 99 (E.D. Tex. Apr. 17, 2020)	Samsung Markman
15	Claim Construction Order from *Solas OLED Ltd. v. LG Display Co., LG Elec., Inc., and Sony Corp.*, Dkt. 82, Case 6:19-cv-00236-ADA (W.D. Tex. June 9, 2020)	LG/Sony Markman
16	Parties' Joint Claim Construction Statement from *Solas OLED Ltd. v. LG Display Co., LG Elec., Inc., and Sony Corp.*, Dkt. 76, Case 6:19-cv-00236-ADA (W.D. Tex. May 1, 2020)	LG/Sony JCC

[2] Exhibits 1–22 were submitted with Solas's opening claim construction brief. Exhibits 23–25 are submitted with this brief.

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