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

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

DEFENDANTS' AND INTERVENOR'S REPLY CLAIM CONSTRUCTION BRIEF

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TABLE OF AUTHORITIES

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Cases

Table of Defendants' Exhibits[1]

Ex. No.	Exhibit / Publication Name
AA01	Excerpt from Prosecution History of U.S. Patent No. 7,446,338 – February 25, 2008 Amendment
AA02	Claim Construction Memorandum and Order, Solas OLED Ltd. v. Samsung Display Co. Ltd., et al., 2:19-cv-00152-JRG, Dkt. 99 (Apr. 17, 2020, E.D. Tex.)
AA03	Excerpts from Deposition of Richard A. Flasck, Solas OLED Ltd. v. Samsung Display Co. Ltd. et al., 2:19-cv-00152-JRG (Feb. 6, 2020, W.D. Tex.)
AA04	Solas's Proposed terms for Construction
AA05	Patent Owner's Preliminary Response, IPR2020-00320 (April 25, 2020, PTAB)
AA06	Solas Notice Of Agreement On Previously Disputed Claim Construction Terms, *Solas OLED Ltd. v. Samsung Display Co.*, 2:19-cv-00152-JRG, Dkt. 98 (E.D. Tex., April 15, 2020)
BB01	Prosecution History of European Patent Application No. 1,372,136
BB02	Prosecution History of U.S. Patent No. 7.499,042
BB03	Jiun-Haw Lee et al., Introduction to Flat Panel Displays 50-52 (John Wiley & Sons 2008)
BB04	Johnathan Halls, Short Course S-4: Fundamentals of OLEDs/PLEDs, S-4/101 (Society for Information Display, May 18, 2008)
DD01	Declaration of Richard A. Flasck in Support Of Solas's Responsive Claim Construction Brief, Solas OLED Ltd. v. LG, Ltd., et al, 6:19-cv-00236-ADA (Apr. 3, 2020, W.D. Tex.)
DD02	Solas's Reply Claim Construction Brief, Solas OLED Ltd. v. LG, Ltd., et al, 6:19-cv-00236-ADA (Apr. 24, 2020, W.D. Tex.)
DD03	Videoconference Deposition of Richard A. Flasck, Solas OLED Ltd. v. LG, Ltd., et al, 6:19-cv-00236-ADA, Dkt._82 (Apr. 14, 2020, W.D. Tex.)
DD04	Phillip A. Laplante, Comprehensive Dictionary of Electrical Engineering 213, 643 (Taylor & Francis Group, 2nd ed. 2005)
DD05	Stan Gibilisco, The Illustrated Dictionary of Electronics 179 (McGraw-Hill, 8th ed. 2001)
DD06	A Dictionary of Science 738-39 (Oxford University Press, 2006)
DD07	Steven M. Kaplan, Wiley Electrical and Electronics Engineering Dictionary 237 (John Wiley & Sons, Inc., 2004)
DD08	Collins Dictionary Electronics 139 (HarperCollins, 2007)
DD09	Erin McKean, The New Oxford American Dictionary 545 (Oxford University Press, 2nd ed. 2005)

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[1] All exhibits were filed with Defendants' opening and responsive claim construction briefs. No additional exhibits are being filed with this reply brief.

Table Of Abbreviations For Citations To Parties' Briefs And Expert Declarations

Acronym	Document Description
Solas Open.	Solas's Opening Claim Construction Brief Filed as Dkt. 74 in the *Solas OLED Ltd. v. Google LLC*, Case No. 6:19-cv-00515-ADA ("*Google* Case")
Solas Resp.	Solas's Responsive Claim Construction Brief Filed as Dkt. 76 in the *Google* Case
Defs. Open.	Defendants' Opening Claim Construction Brief Filed as Dkt. 73 in the *Google* Case
Defs. Resp.	Defendants' Responsive Claim Construction Brief Filed as Dkt. 75 in the *Google* Case
Flasck Open. Decl.	Declaration of Mr. Richard Flasck Supporting Solas's Opening Brief Filed as Dkt. 74-2 in the *Google* Case
Flasck Resp. Decl.	Declaration of Mr. Richard Flasck Supporting Solas's Responsive Brief Filed as Dkt. 76-1 in the *Google* Case
Kanicki Open. Decl.	Declaration of Dr. Jerzy Kanicki Supporting Defendants' Opening Brief Filed as Dkt. 73-1 in the *Google* Case
Kanicki Resp. Decl.	Declaration of Dr. Jerzy Kanicki Supporting Defendants' Responsive Brief Filed as Dkt. 75-1 in the *Google* Case

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