

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

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

**SOLAS’S REPLY CLAIM CONSTRUCTION BRIEF<sup>1</sup>**

<sup>1</sup> 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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Ex <sup>2</sup>	Document Description	Abbreviation
1	Declaration of Richard A. Flasek 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
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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 <a href="http://www.merriam-webster.com">www.merriam-webster.com</a> , accessed May 2020), definitions of "select," "selection," "sequential," and "series."	Merriam-Webster
12	Dictionary.com (avail. at <a href="http://www.dictionary.com">www.dictionary.com</a> , 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 <i>Solas OLED Ltd. v. Samsung Display Co., Ltd.</i> , 2:19-CV-00152-JRG, Dkt. 99 (E.D. Tex. Apr. 17, 2020)	Samsung Markman
15	Claim Construction Order from <i>Solas OLED Ltd. v. LG Display Co., LG Elec., Inc., and Sony Corp.</i> , Dkt. 82, Case 6:19-cv-00236-ADA (W.D. Tex. June 9, 2020)	LG/Sony Markman
16	Parties' Joint Claim Construction Statement from <i>Solas OLED Ltd. v. LG Display Co., LG Elec., Inc., and Sony Corp.</i> , Dkt. 76, Case 6:19-cv-00236-ADA (W.D. Tex. May 1, 2020)	LG/Sony JCC

<sup>2</sup> Exhibits 1–22 were submitted with Solas's opening claim construction brief. Exhibits 23–25 were submitted with Solas's responsive brief. Exhibit 26 is submitted with this reply brief.

17	HP's proposed claim constructions, Case No. 6:19-cv-00631-ADA, served May 22, 2020	HP's Proposed Constructions
18	Solas's Disclosure of Asserted Claims and Infringement Contentions Against Samsung, Case No. 2:19-cv-00152-JRG (E.D. Texas), Oct. 7, 2019	Samsung Contentions
19	Apple's proposed terms for construction, Case No. 6:19-cv-00537-ADA, served Apr. 30, 2020	Apple's Proposed Terms
20	Apple's proposed claim constructions, Case No. 6:19-cv-00537-ADA, served May 22, 2020	Apple's Proposed Constructions
21	Excerpts of transcript of April 14, 2020, Telephonic Motion Hearing from <i>Solas v. Dell and Google</i> , Case Nos. 6:19-cv-00514-ADA, 6:19-cv-00515-ADA.	Motion Hearing Tr.
22	The New Oxford American Dictionary, Second Edition (2005)	New Oxford American Dictionary
23	Declaration of Richard A. Flasck in support of Solas's responsive claim construction brief	Flasck Resp. Decl.
24	Excerpts of the April 13, 2020 deposition transcript of Douglas R. Holberg from <i>Solas OLED Ltd. v. LG Display Co., LG Elec., Inc., and Sony Corp.</i> , Dkt. 82, Case 6:19-cv-00236-ADA	Holberg Dep.
25	Patent Owner's response to supplemental pre-institution brief, IPR2020-00320, Paper 8, dated May 11, 2020	Solas Pre-inst. Br.
26	Excerpts from Defendants LG and Sony's responsive claim construction brief in <i>Solas OLED Ltd. v. LG Display Co., LG Elec., Inc., and Sony Corp.</i> , Dkt. 71, Case 6:19-cv-00236-ADA	LG Resp. Br.

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