

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

Solas OLED Ltd., an Irish corporation,

Plaintiff,

vs.

Samsung Display Co., Ltd, a Korea corporation;

Defendant.

CASE NO. 6:12-cv-00185

**Complaint for Patent
Infringement**

JURY DEMANDED

Complaint for Patent Infringement

Plaintiff Solas OLED Ltd. (“Solas”) files this complaint against Defendant Samsung Display Co., Ltd. (“SDC”), alleging infringement of U.S. Patent No. 6,072,450 (“Patent-in-Suit”). The accused products are SDC’s organic light-emitting diode (“OLED”) display modules included in Apple products.

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.

Defendant and the Accused Products.

3. Defendant Samsung Display Corporation. is a Korea corporation.

4. The accused products are SDC's organic light-emitting diode ("OLED") display modules included in Apple products. As illustrative examples, this includes iPhone, Apple, and MacBook Pro models.

Jurisdiction, venue, and joinder.

5. Solas asserts claims for patent infringement against SDC 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).

6. The Court has personal jurisdiction over SDC. Defendant SDC has established minimum contacts with the United States as a whole such that the exercise of jurisdiction would not offend traditional notions of fair play and substantial justice. Defendant SDC has purposefully directed activities at the United States—in particular, directing display modules, either alone and/or included in products such as smartphones and computers, to distributors and customers within the United States (including within this district) and engaging in sales and marketing efforts to generate and support such sales. The claims for infringement arise out of, or relate to, those activities. The exercise of jurisdiction over SDC would not offend traditional notions of fair play and substantial justice.

7. Venue is proper in this district under 28 U.S.C. §1400(b) and 28 U.S.C. §§ 1391(c) because SDC is a foreign defendant.

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

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

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

10. 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.

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

12. 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 SDC's past infringement.

13. SDC has directly infringed (literally and equivalently) and induced others, including, Apple Incorporated, 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.

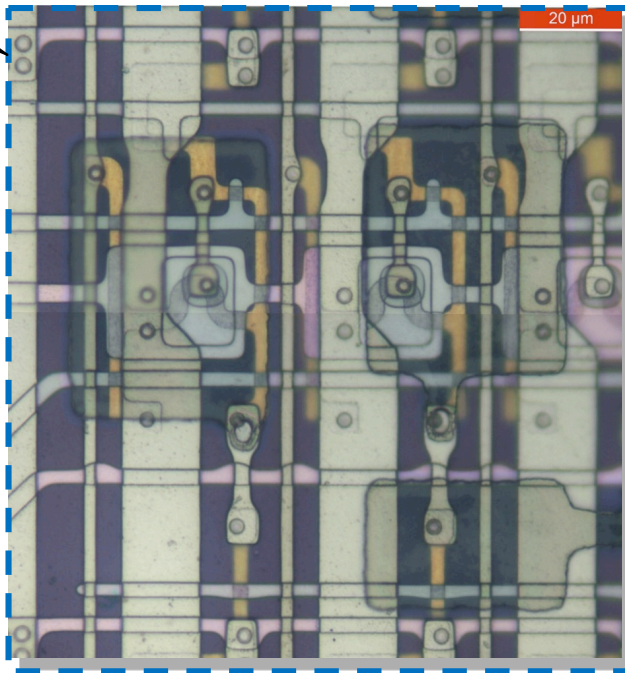
Direct Infringement

14. SDC has directly infringed (literally and equivalently) at least one claim of the '450 patent by offering to sell, selling, and importing the Accused Products in the United States. SDC has infringed multiple claims of the '450 patent, including independent claim 1. By way of example only, the SDC's display modules included in 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;"

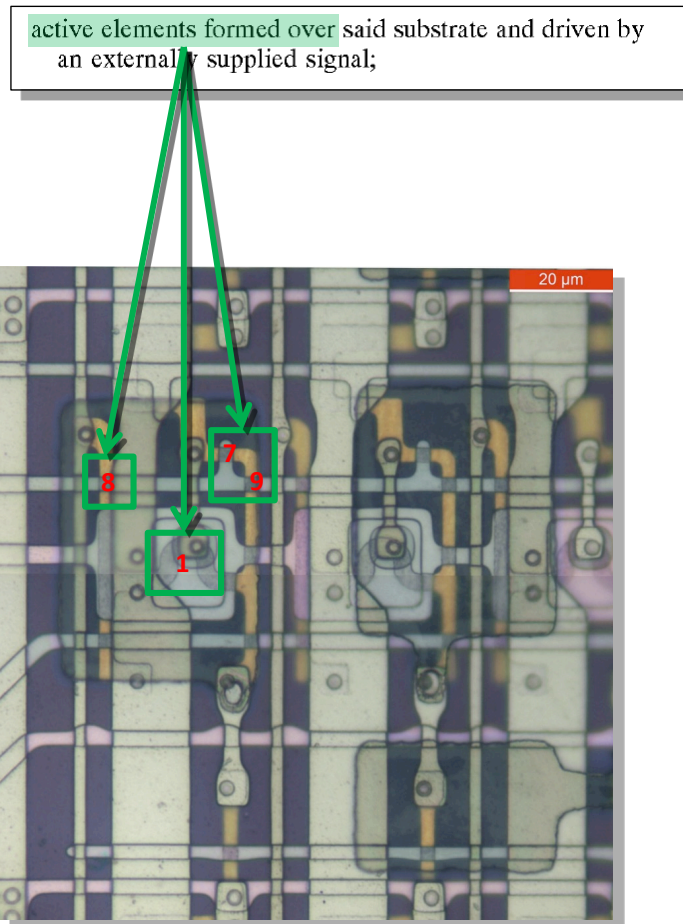
The accused MacBook Pro display modules include Organic Light Emitting Diode (OLED) panels that include a polyimide substrate:

substrate



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

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



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