

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

MIANYANG BOE OPTOELECTRONICS TECHNOLOGY CO., LTD.;
WUHAN CHINA STAR OPTOELECTRONICS SEMICONDUCTOR DISPLAY
TECHNOLOGY CO., LTD.; TIANMA MICROELECTRONICS CO., LTD.;
AND VISIONOX TECHNOLOGY, INC.,
Petitioner,

v.

SAMSUNG DISPLAY CO., LTD.
Patent Owner.

Case IPR2024-00620
U.S. Patent No. 9,330,593

DECLARATION OF ARIS K. SILZARS, Ph.D.

I, Aris K. Silzars, Ph.D., declare and state, to the best of my knowledge, understanding, and belief, as follows:

1. I am an independent consultant in the field of display technology.
2. I was asked by counsel for Samsung Display Co. Ltd. to tear down and obtain photographs from replacement AMOLED displays purchased from various vendors.
3. On December 14, 2022, I purchased an “OLED Screen Digitizer Assembly With Frame for iPhone 12 / 12 Pro (High Quality) – Black” sample (SKU No. PH-LCD-IP-001063BKA) from Mengtor’s online store at www.mengtor.com. The order number was 8806201671042464. I received the sample on November 15, 2022, which was shipped via Fedex Priority Overnight (Tracking No. 518271257410) from 355 S. Lemon Ave. Suite E, Walnut, California 91789, United States. After receiving the “OLED Screen Digitizer Assembly With Frame for iPhone 12 / 12 Pro (High Quality) – Black” sample (SKU No. PH-LCD-IP-001063BKA) from Mengtor, I was asked by counsel for Samsung Display Co., Ltd. to obtain photographs of the order confirmation, product, receipt, and shipping label. I was also asked by counsel for Samsung Display Co. Ltd. to tear down and obtain photographs of the “OLED Screen Digitizer Assembly With Frame for iPhone 12 / 12 Pro (High Quality) –

Black” sample (SKU No. PH-LCD-IP-001063BKA) from Mengtor. True and accurate copies of the photographs that I obtained are attached as Exhibit 2026.¹

4. Likewise, on November 13, 2022, I purchased an “OLED Assembly Compatible For iPhone 12 / 12 Pro (Aftermarket Plus: Hard)” sample (SKU No. 107085042469) from MobileSentry’s online store at www.mobilesentry.com. The order number was 103670878. I received the sample on November 15, 2022, which was shipped via FedEx Priority Overnight (Tracking No. 390576214831) from 4315 Walney Road, Suite D, Chantilly, VA 20151, United States. After receiving the “OLED Assembly Compatible For iPhone 12 / 12 Pro (Aftermarket Plus: Hard)” sample (SKU No. 107085042469) from MobileSentry, I was asked by counsel for Samsung Display Co. Ltd. to obtain photographs of the order confirmation, product, receipt, and shipping label. I was also asked by counsel for Samsung Display Co. Ltd. to tear down and obtain photographs from the “OLED Assembly Compatible For iPhone 12 / 12 Pro (Aftermarket Plus: Hard)” sample (SKU No. 107085042469) from MobileSentry. True and accurate copies of the photographs that I obtained are attached as Exhibit 2025.

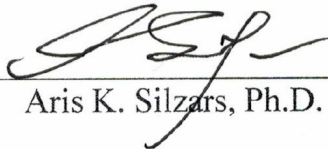
¹ Exhibit numbers throughout this declaration were assigned to me by counsel for Samsung Display Co., Ltd.

5. I was also asked by counsel for Samsung Display Co. Ltd. to obtain similar photographs from samples of replacement AMOLED displays from:

- Mobile Defenders (photographs that I obtained attached as Exhibit 2028);
- Injured Gadgets (photographs that I obtained attached as Exhibit 2029);
- Group Vertical (photographs that I obtained attached as Exhibit 2031);
- Fixez.com (photographs that I obtained attached as Exhibit 2038);
- Repairs Universe (photographs that I obtained attached as Exhibit 2036);
- SEGMobile (photographs that I obtained attached as Exhibit 2034);
- Sourcely Plus (photographs that I obtained attached as Exhibit 2037);
- eTech Parts (photographs that I obtained attached as Exhibit 2032);
- Parts4Cells (photographs that I obtained attached as Exhibit 2033);
- Wholesale Gadget Parts (photographs that I obtained attached as Exhibit 2039);
- Captain Mobile Parts (photographs that I obtained attached as Exhibit 2035);
- DFW Cellphone and Parts (photographs that I obtained attached as Exhibit 2041);
- Phone LCD Parts (photographs that I obtained attached as Exhibit 2027);
- Parts4LCD (photographs that I obtained attached as Exhibit 2040); and
- Gadgetfix (photographs that I obtained attached as Exhibit 2030).

I declare that all statements made herein of my own and acquired knowledge are true and that all statements made on information and belief are believed to be true. I further declare that all statements were made with the knowledge that willful false statements and the like so made are punishable by fine or imprisonment, or both, under Section 1001 of Title 18 of the United States Code.

Executed on DEC. 11, 2024 in Sammamish, Washington.


Aris K. Silzars, Ph.D.