

Zhong, Annita

From: Patrick Stafford <patrickstafford@quinnemanuel.com>
Sent: Wednesday, November 6, 2024 3:23 PM
To: Zhong, Annita; Gavin Snyder; Linxwiler, Jeffrey; #Pictiva-Samsung; ~Baxter, Samuel; jtruelove@mckoolsmith.com
Cc: QE-Samsung-Pictiva; ~Smith, Melissa
Subject: Re: Pictiva v. Samsung, Case No. 2:23-cv-00495 - Rule 4-2 disclosures

Annita,

Your recounting of the meet and confer is inaccurate. I did not provide an unequivocal yes in answering your hypothetical questions. On the meet and confer, you also refused to answer these same hypothetical questions for Pictiva's proposed constructions.

We have provided our proposed constructions for these terms and we understand that Pictiva does not agree with our proposed constructions. We will address the disputed constructions in the claim construction briefing pursuant to the Court's Docket Control Order.

Best regards,

Patrick Stafford

Of Counsel,

Quinn Emanuel Urquhart & Sullivan, LLP

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From: Zhong, Annita <HZhong@irell.com>

Date: Tuesday, November 5, 2024 at 8:05 PM

To: Patrick Stafford <patrickstafford@quinnemanuel.com>, Gavin Snyder <gavinsnyder@quinnemanuel.com>, Linxwiler, Jeffrey <jlinxwiler@irell.com>, #Pictiva-Samsung <Pictiva-Samsung@irell.com>, ~Baxter, Samuel <sbaxter@mckoolsmith.com>, jtruelove@mckoolsmith.com <jtruelove@mckoolsmith.com>

Cc: QE-Samsung-Pictiva <qe-samsung-pictiva@quinnemanuel.com>, ~Smith, Melissa <melissa@gillamsmithlaw.com>

Subject: RE: Pictiva v. Samsung, Case No. 2:23-cv-00495 - Rule 4-2 disclosures

[EXTERNAL EMAIL from hzhong@irell.com]

Patrick,

With all due respect, you completely failed to respond to the question I asked.

I note that at the meet-and-confer, when I first asked you, if the emission by an organic layer sequence includes a peak in the blue light region, a shoulder in the green light region and a tail in the red light region, whether that means the electromagnetic radiation with a first wavelength spectrum would include wavelengths corresponding to the blue, green and red light under Samsung's proposed construction, you responded with an unequivocal yes. It was only after I pointed out that this position was inconsistent with Samsung's position in the IPR that you back pedaled and pretended that you did not understand the question.

Regards,

Annita

H. Annita Zhong
Irell & Manella LLP
1800 Avenue of the Stars, Suite 900
Los Angeles, CA 90067-4276
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Fax: (310) 556-5385

From: Patrick Stafford <patrickstafford@quinnemanuel.com>

Sent: Tuesday, November 5, 2024 4:38 PM

To: Zhong, Annita <HZhong@irell.com>; Gavin Snyder <gavinsnyder@quinnemanuel.com>; Linxwiler, Jeffrey <jlinxwiler@irell.com>; #Pictiva-Samsung <Pictiva-Samsung@irell.com>; ~Baxter, Samuel <sbaxter@mckoolsmith.com>; jtruelove@mckoolsmith.com

Cc: QE-Samsung-Pictiva <qe-samsung-pictiva@quinnemanuel.com>; ~Smith, Melissa <melissa@gillamsmithlaw.com>

Subject: Re: Pictiva v. Samsung, Case No. 2:23-cv-00495 - Rule 4-2 disclosures

Annita,

Samsung's proposed construction for "an organic layer sequence which emits an electromagnetic radiation having a first wavelength spectrum during operation" is clear as stated. Samsung's proposed construction is "an organic layer sequence comprising an active layer and electrodes which emits an electromagnetic radiation with a first wavelength spectrum which corresponds to the entire wavelength spectrum of the electromagnetic radiation emitted by the organic layer sequence during operation." Samsung's proposed construction for "the filter layer is transparent to the electromagnetic radiation having the first wavelength spectrum" is also clear as it states "the filter layer is transparent to the electromagnetic radiation having the first entire wavelength spectrum so the emission passes through the filter without any alteration of its spectral components."

Best regards,

Patrick Stafford

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From: Zhong, Annita <HZhong@irell.com>

Date: Friday, November 1, 2024 at 2:39 PM

To: Patrick Stafford <patrickstafford@quinnemanuel.com>, Gavin Snyder <gavinsnyder@quinnemanuel.com>, Linxwiler, Jeffrey <jlinxwiler@irell.com>, #Pictiva-Samsung <Pictiva-Samsung@irell.com>, ~Baxter, Samuel <sbaxter@mckoolsmith.com>, jtruelove@mckoolsmith.com <jtruelove@mckoolsmith.com>

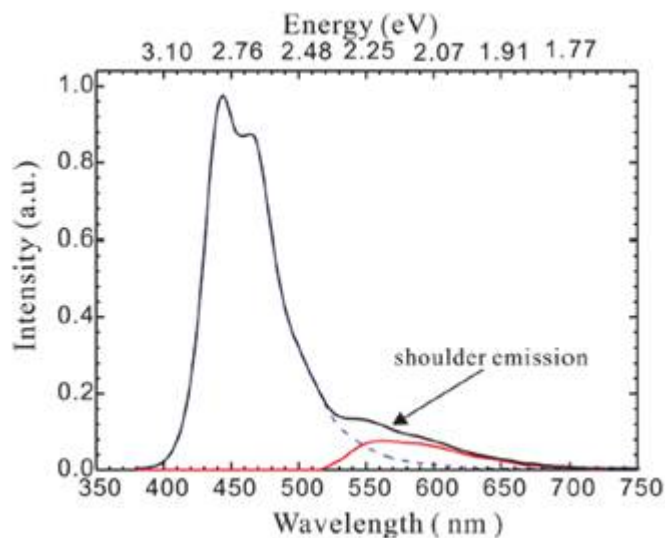
Cc: QE-Samsung-Pictiva <qe-samsung-pictiva@quinnemanuel.com>, ~Smith, Melissa <melissa@gillamsmithlaw.com>

Subject: RE: Pictiva v. Samsung, Case No. 2:23-cv-00495 - Rule 4-2 disclosures

[EXTERNAL EMAIL from hzhong@irell.com]

Patrick,

Thanks for the call today. Regarding the term “an organic layer sequence which emits an electromagnetic radiation having a first wavelength spectrum during operation,” if the emission spectrum of the organic layer sequence is the black curve below, what is the “electromagnetic radiation having a first wavelength spectrum” under Samsung’s construction? All emission as represented by the black curve from about 370 nm to about 700nm? And for this emission spectrum, if the filter blocks the transmission at 500 nm and above, is the filter “transparent to the electromagnetic radiation having the first wavelength spectrum”? Please let us know your answers, which will be helpful for us to understand your position and to see whether a common ground can be reached.



Best,

Annita

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From: Patrick Stafford <patrickstafford@quinnemanuel.com>
Sent: Tuesday, October 29, 2024 2:51 PM
To: Zhong, Annita <HZhong@irell.com>; Gavin Snyder <gavinsnyder@quinnemanuel.com>; Linxwiler, Jeffrey <jlinxwiler@irell.com>; #Pictiva-Samsung <Pictiva-Samsung@irell.com>; ~Baxter, Samuel <sbaxter@mckoolsmith.com>; jtruelove@mckoolsmith.com
Cc: QE-Samsung-Pictiva <qe-samsung-pictiva@quinnemanuel.com>; ~Smith, Melissa <melissa@gillamsmithlaw.com>
Subject: RE: Pictiva v. Samsung, Case No. 2:23-cv-00495 - Rule 4-2 disclosures

Please use the below dial in for the meet and confer on Friday at 10 am PT:

Join Zoom Meeting
<https://quinnemanuel.zoom.us/j/3427683913?omn=89882729091>

Meeting ID: 342 768 3913
One tap mobile
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+12678310333,,3427683913# US (Philadelphia)

Dial by your location
+1 786 635 1003 US (Miami)
+1 267 831 0333 US (Philadelphia)
+1 301 715 8592 US (Washington DC)
+1 312 626 6799 US (Chicago)
+1 470 250 9358 US (Atlanta)
+1 470 381 2552 US (Atlanta)
+1 646 518 9805 US (New York)
+1 646 558 8656 US (New York)
+1 651 372 8299 US (Minnesota)
+1 669 219 2599 US (San Jose)
+1 720 928 9299 US (Denver)
+1 971 247 1195 US (Portland)
+1 213 338 8477 US (Los Angeles)
+1 253 215 8782 US (Tacoma)
+1 346 248 7799 US (Houston)
+1 602 753 0140 US (Phoenix)

Meeting ID: 342 768 3913

Alternate Dial-in Numbers: <https://quinnemanuel.zoom.us/u/kdxbRuoJww>

Join by SIP
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From: Zhong, Annita <HZhong@irell.com>
Sent: Tuesday, October 29, 2024 5:46 PM
To: Patrick Stafford <patrickstafford@quinnemanuel.com>; Gavin Snyder <gavinsnyder@quinnemanuel.com>; Linxwiler, Jeffrey <jlinxwiler@irell.com>; #Pictiva-Samsung <Pictiva-Samsung@irell.com>; ~Baxter, Samuel <sbaxter@mckoolsmith.com>; jtruelove@mckoolsmith.com
Cc: QE-Samsung-Pictiva <qe-samsung-pictiva@quinnemanuel.com>; ~Smith, Melissa <melissa@gillamsmithlaw.com>
Subject: RE: Pictiva v. Samsung, Case No. 2:23-cv-00495 - Rule 4-2 disclosures

[EXTERNAL EMAIL from hzhong@irell.com]

Yes.

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From: Patrick Stafford <patrickstafford@quinnemanuel.com>
Sent: Tuesday, October 29, 2024 2:44 PM
To: Zhong, Annita <HZhong@irell.com>; Gavin Snyder <gavinsnyder@quinnemanuel.com>; Linxwiler, Jeffrey <jlinxwiler@irell.com>; #Pictiva-Samsung <Pictiva-Samsung@irell.com>; ~Baxter, Samuel <sbaxter@mckoolsmith.com>; jtruelove@mckoolsmith.com
Cc: QE-Samsung-Pictiva <qe-samsung-pictiva@quinnemanuel.com>; ~Smith, Melissa <melissa@gillamsmithlaw.com>
Subject: RE: Pictiva v. Samsung, Case No. 2:23-cv-00495 - Rule 4-2 disclosures

We are not available Thursday afternoon PT. We are available Friday at 10 am PT. Please let us know if that works for you.

Best regards,

Patrick Stafford
Of Counsel,
Quinn Emanuel Urquhart & Sullivan, LLP

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To: Patrick Stafford <patrickstafford@quinnemanuel.com>; Gavin Snyder <gavinsnyder@quinnemanuel.com>; Linxwiler,

Jeffrey <jlinxwiler@irell.com>; #Pictiva-Samsung <Pictiva-Samsung@irell.com>; ~Baxter, Samuel <sbaxter@mckoolsmith.com>; jtruelove@mckoolsmith.com

Cc: QE-Samsung-Pictiva <qe-samsung-pictiva@quinnemanuel.com>; ~Smith, Melissa <melissa@gillamsmithlaw.com>

Subject: RE: Pictiva v. Samsung, Case No. 2:23-cv-00495 - Rule 4-2 disclosures

[EXTERNAL EMAIL from hzhong@irell.com]

Are you available on Thursday afternoon PT?

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Fax: (310) 556-5385

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Sent: Tuesday, October 29, 2024 2:22 PM

To: Gavin Snyder <gavinsnyder@quinnemanuel.com>; Zhong, Annita <HZhong@irell.com>; Linxwiler, Jeffrey <jlinxwiler@irell.com>; #Pictiva-Samsung <Pictiva-Samsung@irell.com>; ~Baxter, Samuel <sbaxter@mckoolsmith.com>; jtruelove@mckoolsmith.com

Cc: QE-Samsung-Pictiva <qe-samsung-pictiva@quinnemanuel.com>; ~Smith, Melissa <melissa@gillamsmithlaw.com>

Subject: RE: Pictiva v. Samsung, Case No. 2:23-cv-00495 - Rule 4-2 disclosures

Counsel,

Please let us know if you are available to meet and confer on the proposed claim constructions for the 425 and 547 patents on Thursday at 9 am PT.

Best regards,

Patrick Stafford

Of Counsel,

Quinn Emanuel Urquhart & Sullivan, LLP

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From: Gavin Snyder <gavinsnyder@quinnemanuel.com>

Sent: Monday, October 28, 2024 7:46 PM

To: Zhong, Annita <HZhong@irell.com>; Linxwiler, Jeffrey <jlinxwiler@irell.com>; #Pictiva-Samsung <Pictiva-Samsung@irell.com>; ~Baxter, Samuel <sbaxter@mckoolsmith.com>; jtruelove@mckoolsmith.com

Cc: QE-Samsung-Pictiva <qe-samsung-pictiva@quinnemanuel.com>; ~Smith, Melissa <melissa@gillamsmithlaw.com>

Subject: RE: Pictiva v. Samsung, Case No. 2:23-cv-00495 - Rule 4-2 disclosures

Annita, we're available to meet and confer regarding claim construction tomorrow at 1 PM Pacific. We can use this Zoom room: <https://quinnemanuel.zoom.us/j/3812416182>.

Best,
Gavin

From: Zhong, Annita <HZhong@irell.com>
Sent: Wednesday, October 23, 2024 2:04 PM
To: Jeremy Baldoni <jeremybaldoni@quinnemanuel.com>; Linxwiler, Jeffrey <jlinxwiler@irell.com>; ~Smith, Melissa <melissa@gillamsmithlaw.com>; QE-Samsung-Pictiva <qe-samsung-pictiva@quinnemanuel.com>
Cc: #Pictiva-Samsung <Pictiva-Samsung@irell.com>; ~Baxter, Samuel <sbaxter@mckoolsmith.com>; jtruelove@mckoolsmith.com
Subject: RE: Pictiva v. Samsung, Case No. 2:23-cv-00495 - Rule 4-2 disclosures

[EXTERNAL EMAIL from hzhong@irell.com]

Counsel,

Please let us know when you are available this Friday or next Tuesday for a meet-and-confer on your proposed construction.

Annita

H. Annita Zhong
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From: Jeremy Baldoni <jeremybaldoni@quinnemanuel.com>
Sent: Tuesday, October 22, 2024 3:12 PM
To: Linxwiler, Jeffrey <jlinxwiler@irell.com>; ~Smith, Melissa <melissa@gillamsmithlaw.com>; QE-Samsung-Pictiva <qe-samsung-pictiva@quinnemanuel.com>
Cc: #Pictiva-Samsung <Pictiva-Samsung@irell.com>; ~Baxter, Samuel <sbaxter@mckoolsmith.com>; jtruelove@mckoolsmith.com
Subject: RE: Pictiva v. Samsung, Case No. 2:23-cv-00495 - Rule 4-2 disclosures

9 PM PT today works for us.

Jeremy Baldoni
Of Counsel
Quinn Emanuel Urquhart & Sullivan, LLP

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From: Linxwiler, Jeffrey <jlinxwiler@irell.com>
Sent: Tuesday, October 22, 2024 5:08 PM
To: ~Smith, Melissa <melissa@gillamsmithlaw.com>; QE-Samsung-Pictiva <qe-samsung-pictiva@quinnemanuel.com>
Cc: #Pictiva-Samsung <Pictiva-Samsung@irell.com>; ~Baxter, Samuel <sbaxter@mckoolsmith.com>; jtruelove@mckoolsmith.com
Subject: Pictiva v. Samsung, Case No. 2:23-cv-00495 - Rule 4-2 disclosures

[EXTERNAL EMAIL from jlinxwiler@irell.com]

Counsel,

We propose that the parties serve their Rule 4-2 disclosures simultaneously at 9:00 pm PT today. Please let us know if Samsung agrees.

Best,
Jeff

Jeffrey Linxwiler

Associate

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