

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

PICTIVA DISPLAYS INTERNATIONAL LTD.

Plaintiff,

v.

SAMSUNG ELECTRONICS CO. LTD., and
SAMSUNG ELECTRONICS AMERICA, INC.,

Defendants.

Civil Action No. 2:23-cv-00495-JRG

JURY TRIAL DEMANDED

**SAMSUNG DEFENDANTS' NOTICE OF
CORRECTED EXHIBIT B TO JOINT P.R. 4-3 STATEMENT**

Defendants Samsung Electronics Co., Ltd and Samsung Electronics America, Inc. ("Samsung") respectfully correct and replace Exhibit B (Dkt. 108-2) to the Joint 4-3 Claim Construction And Prehearing Statement. The corrected Exhibit B is attached hereto.

Dated: November 15, 2024

By: /s/ Melissa R. Smith

Melissa R. Smith
Texas State Bar No. 24001351
melissa@gillamsmithlaw.com
GILLAM & SMITH, LLP
303 South Washington Avenue
Marshall, Texas 75670
Phone: (903) 934-8450
Fax: (903) 934-9257

D. James Pak (admitted *pro hac vice*)
Lance Yang (admitted in E.D. Tex.)
Patrick Schmidt (admitted *pro hac vice*)

djamespak@quinnemanuel.com
lanceyang@quinnemanuel.com
patrickschmidt@quinnemanuel.com
**QUINN EMANUEL URQUHART &
SULLIVAN, LLP**
865 South Figueroa Street, 10th Floor
Los Angeles, CA 90017
Tel: 213-443-3000
Fax: 213-443-3100

Sean S. Pak (admitted *pro hac vice*)
Melissa J. Baily (admitted in E.D. Tex.)
seanpak@quinnemanuel.com
melissabaily@quinnemanuel.com
**QUINN EMANUEL URQUHART &
SULLIVAN, LLP**
50 California Street, 22nd Floor
San Francisco, California 94111
Tel: 415-875-6600
Fax: 415-875-6700

John Bash
Texas State Bar No. 24067504
johnbash@quinnemanuel.com
**QUINN EMANUEL URQUHART &
SULLIVAN, LLP**
300 West 6th Street, Suite 2010
Austin, Texas 78701-3901
Phone: (737) 667-6100
Fax: (737) 667-6110

***Attorneys for Defendants Samsung Electronics
Co., Ltd. and Samsung Electronics America, Inc.***

CERTIFICATE OF SERVICE

Pursuant to the Federal Rules of Civil Procedure and Local Rule CV-5, I hereby certify that, on November 15, 2024, all counsel of record who have appeared in this case are being served with a copy of the foregoing via the Court's CM/ECF system.

Dated: November 15, 2024

/s/ Melissa R. Smith
Melissa R. Smith

Amended Exhibit B

Patent	Term	Claims	Samsung's Proposed Construction	Extrinsic Evidence	Intrinsic Evidence
6,949,389	upon said devices	34	"directly on said devices"	The Oxford English Dictionary, Second Edition, prepared by J. A. Simpson and E.S.C. Weiner, Volume XIX, Oxford University Press, 1991 ("Above and in contact with; in an elevated position on; at rest on the upper surface of; on and supported by"). Papers and Evidence submitted with IPR 2024-01222 or IPR 2024-01223 (to the extent not qualified as intrinsic evidence). Any extrinsic evidence relied upon by Plaintiff. Samsung intends to rely on expert testimony of Dr. E. Fred Schubert. Dr. Schubert, an expert in the field of the '389 patent, may provide testimony in support of Samsung's proposed construction.	<i>See, e.g.</i> , 4:56-58; November 18, 2003 Response to Office Action (and U.S. Patent No. 5,703,433 referenced therein)
6,949,389	upon said mask and said plurality of devices	41	"directly on both said mask and said plurality of devices."	The Oxford English Dictionary, Second Edition, prepared by J. A. Simpson and E.S.C. Weiner, Volume XIX, Oxford University Press, 1991	<i>See, e.g.</i> , 4:56-58; November 18, 2003 Response to Office Action (and U.S. Patent No. 5,703,433 referenced therein)

Patent	Term	Claims	Samsung's Proposed Construction	Extrinsic Evidence	Intrinsic Evidence
				("Above and in contact with; in an elevated position on; at rest on the upper surface of; on and supported by"). Papers and Evidence submitted with IPR 2024-01222 or IPR 2024-01223 (to the extent not qualified as intrinsic evidence). Any extrinsic evidence relied upon by Plaintiff. Samsung intends to rely on expert testimony of Dr. E. Fred Schubert. Dr. Schubert, an expert in the field of the '389 patent, may provide testimony in support of Samsung's proposed construction.	
6,949,389	planarization layer	34, 35, 41, 46	"a layer of material that planarizes such that the propagation of defects from one layer to another layer is interrupted and the topography of the underlying layer is not reproduced."	U.S. Pat. App. No. 2002/0140347 ("By 'planarizing material' is meant a material that forms a smooth planar surface upon application, rather than forming a surface that reflects irregular contours of the underlying surface. A preferred material is one that, when deposited onto a surface, forms a non-conformal liquid. This could be, for example, a polyacrylate	<i>See, e.g.</i> , 1:17-37; 1:30-35; 1:57-62; ; 4:33-41; 6:57-61; 7:4-5; July 19, 2004 Response to Non-Final Rejection; Nov. 24, 2003 Response to Non-Final Rejection

Patent	Term	Claims	Samsung's Proposed Construction	Extrinsic Evidence	Intrinsic Evidence
				monomer (this material is then subjected to ultraviolet light, crosslinking the monomer to form a polyacrylate). Preferred planarizing materials are polymers, such as fluorinated polymers, parylenes, cyclotenes and polyacrylates.”). U.S. Pat. No. 6,597,111 (“A polymeric planarizing sublayer comprises a polymeric planarizing material that forms a smooth planar surface upon application, rather than forming a surface that reflects irregular contours of the underlying surface. Preferred thicknesses for the planarizing layers is typically 1,000 to 50,000 Å. Preferred polymeric planarizing materials include polymers such as fluorinated polymers, parylenes, cyclotenes and polyacrylates.”). U.S. Patent No. 8,808,457 (“In addition to performing the aforementioned crack-blunting function, organic layer 9A may (as shown in the figure) be made thicker to provide, among other things, planarization.”).	

Patent	Term	Claims	Samsung's Proposed Construction	Extrinsic Evidence	Intrinsic Evidence
				U.S. Pat. No. 6,413,645 (“On top of the scratch resistant layer 110, there is a polymer smoothing layer 115. The polymer smoothing layer decreases surface roughness, and encapsulates surface defects, such as pits, scratches, and digs. This produces a planarized surface which is ideal for subsequent deposition of layers. Depending on the desired application, there can be additional layers deposited on the substrate 105, such as organic or inorganic layers, planarizing layers, electrode layers, antireflective coatings, and other functional layers. In this way, the substrate can be specifically tailored to different applications.”; “Asperities (high points) in the underlying substrate are replicated in the deposited inorganic barrier layer. These features are subject to mechanical damage during web handling/take-up, and can lead to the formation of defects in the deposited film. These defects seriously limit the ultimate barrier performance of the films. In the single pass, polymer/barrier/polymer process, the first acrylic layer planarizes the	

Patent	Term	Claims	Samsung's Proposed Construction	Extrinsic Evidence	Intrinsic Evidence
				substrate and provides an ideal surface for subsequent deposition of the inorganic barrier thin film. The second polymer layer provides a robust 'protective' film that minimizes damage to the barrier layer and also planarizes the structure for subsequent barrier layer (or environmentally sensitive display device) deposition.”). WO2000036665A1 (“Asperities (high points) in the underlying substrate are replicated in the deposited inorganic barrier layer. These features are subject to mechanical damage during web handling/take-up, and can lead to the formation of defects in the deposited film. These defects seriously limit the ultimate barrier performance of the films. In the single pass, polymer/barrier/polymer process, the first acrylic layer planarizes the substrate and provides an ideal surface for subsequent deposition of the inorganic barrier thin film. The second polymer layer provides a robust 'protective' film that minimizes damage to the barrier	

Patent	Term	Claims	Samsung's Proposed Construction	Extrinsic Evidence	Intrinsic Evidence
				layer and also planarizes the structure for subsequent barrier layer (or organic light emitting layer stack) deposition. The intermediate polymer layers also decouple defects that exist in adjacent inorganic barrier layers, thus creating a tortuous path for gas diffusion.”). Papers and Evidence submitted with IPR 2024-01222 or IPR 2024-01223 (to the extent not qualified as intrinsic evidence). Any extrinsic evidence relied upon by Plaintiff. Samsung intends to rely on expert testimony of Dr. E. Fred Schubert. Dr. Schubert, an expert in the field of the '389 patent, may provide testimony in support of Samsung's proposed construction.	
6,949,389	selectively depositing	34, 35, 41	“depositing a material in only desired areas, such that no additional processing must be performed for removing unwanted material.”	The New Oxford Dictionary of English, Judy Pearsall, ed., Oxford University Press, 1998 (“ selective • adjective relating to or involving the selection of the most suitable or best qualified ■ (of a process or	<i>See, e.g.</i> , claim 1; claim 25; 1:8-9; 2:17-29; 2:41-54; 2:60-64; 3:2, 6:53-63, 6:66-7:13, 7:41-46

Patent	Term	Claims	Samsung's Proposed Construction	Extrinsic Evidence	Intrinsic Evidence
				agent) affecting some things and not others: <i>modern pesticides are more selective in effect.</i>"; “selectivity ▸ noun [mass noun] the quality of carefully choosing someone or something as the best or most suitable: <i>provision is organized on the principle of selectivity</i> ■ the property of affecting some things and not others”). Papers and Evidence submitted with IPR 2024-01222 or IPR 2024-01223 (to the extent not qualified as intrinsic evidence). Any extrinsic evidence relied upon by Plaintiff. Samsung intends to rely on expert testimony of Dr. E. Fred Schubert. Dr. Schubert, an expert in the field of the '389 patent, may provide testimony in support of Samsung's proposed construction.	
6,949,389	depositing at least one planarization layer upon said	41	“depositing at least one planarization layer upon said mask and said plurality of devices; then	Papers and Evidence submitted with IPR 2024-01222 or IPR 2024-01223 (to the extent not qualified as intrinsic evidence).	<i>See, e.g.,</i> 1:32-33; 6:66-7:3; 7:38-39; 7:54-60; 7:66-8:1

Patent	Term	Claims	Samsung's Proposed Construction	Extrinsic Evidence	Intrinsic Evidence
	mask and said plurality of devices; removing said mask from said substrate		removing said mask from said substrate"	Any extrinsic evidence relied upon by Plaintiff. Samsung intends to rely on expert testimony of Dr. E. Fred Schubert. Dr. Schubert, an expert in the field of the '389 patent, may provide testimony in support of Samsung's proposed construction.	
8,314,547	an organic layer sequence which emits an electromagnetic radiation having a first wavelength spectrum during operation	1	"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"	Papers and Evidence submitted with IPR 2024-00855 (to the extent not qualified as intrinsic evidence). Any extrinsic evidence relied upon by Plaintiff. Samsung intends to rely on expert testimony of Dr. E. Fred Schubert. Dr. Schubert, an expert in the field of the '547 patent, may provide testimony in support of Samsung's proposed construction.	<i>See, e.g.</i> , Abstract; 1:23-45; 1:46-62; 1:63-2:3; 3:26-54; 3:55-62; 4:33-54; 5:24-35; 5:50-6:8; 7:31-63; 9:9-20; 9:66-10:20; 10:43-60; 11:30-53; 12:11-33; 12:62-13:6; 14:20-36
8,314,547	a filter layer which is at least partially opaque to an	1	"a filter layer which is not transparent to an electromagnetic radiation having a third wavelength	Papers and Evidence submitted with IPR 2024-00855 (to the extent not qualified as intrinsic evidence).	<i>See, e.g.</i> , Abstract; 1:23-45; 1:46-62; 1:63-2:3; 2:40-45; 3:26-54; 3:55-62; 4:33-54; 5:24-35; 5:50-6:8; 7:31-63;

Patent	Term	Claims	Samsung's Proposed Construction	Extrinsic Evidence	Intrinsic Evidence
	electromagnetic radiation having a third wavelength spectrum which corresponds to at least one part of the second wavelength spectrum		spectrum which corresponds to at least one part of the second wavelength spectrum"	Any extrinsic evidence relied upon by Plaintiff. Samsung intends to rely on expert testimony of Dr. E. Fred Schubert. Dr. Schubert, an expert in the field of the '547 patent, may provide testimony in support of Samsung's proposed construction.	9:3-8; 9:9-20; 9:66-10:20; 10:36-42; 10:43-60; 11:30-53; 12:11-33; 12:62-13:6; 14:20-36
8,314,547	the filter layer is transparent to the electromagnetic radiation having the first wavelength spectrum	1	"the filter layer is transparent to the electromagnetic radiation having the first entire wavelength spectrum so it permits an electromagnetic radiation having the first wavelength spectrum to pass through in as unimpeded manner as possible"	Papers and Evidence submitted with IPR 2024-00855 (to the extent not qualified as intrinsic evidence). Any extrinsic evidence relied upon by Plaintiff. Samsung intends to rely on expert testimony of Dr. E. Fred Schubert. Dr. Schubert, an expert in the field of the '547 patent, may provide testimony in support of Samsung's proposed construction.	<i>See, e.g.</i> , Abstract; 1:23-45; 1:46-62; 1:63-2:3; 2:40-45; 3:26-54; 3:55-62; 4:33-54; 5:24-35; 5:50-6:8; 7:31-63; 9:3-8; 9:9-20; 9:66-10:20; 10:36-42; 10:43-60; 11:30-53; 12:11-33; 12:62-13:6; 14:20-36

8,314,547	an encapsulation one of disposed upstream and disposed downstream	11	Indefinite	Papers and Evidence submitted with IPR 2024-00855 (to the extent not qualified as intrinsic evidence). Any extrinsic evidence relied upon by Plaintiff. Samsung intends to rely on expert testimony of Dr. E. Fred Schubert. Dr. Schubert, an expert in the field of the '547 patent, may provide testimony in support of Samsung's proposed construction.	<i>See, e.g.,</i> Abstract; 9:9-20
8,558,223	metal complex	1, 2, 10, 11, 13, 14	"a metal complex that is not a compound composed of one or more metal atoms and one or more oxygen atoms"	Papers and Evidence submitted with IPR 2024-01094 (to the extent not qualified as intrinsic evidence). Any extrinsic evidence relied upon by Plaintiff. Samsung intends to rely on expert testimony of Dr. E. Fred Schubert. Dr. Schubert, an expert in the field of the '223 patent, may provide testimony in support of Samsung's proposed construction.	<i>See, e.g.,</i> Nov. 1, 2012 office action; Feb. 1, 2013 response to office action; June 12, 2013 Notice of Allowability; 1:16-22; 1:53-2:16; 2:19-27; 2:39-67; 3:4-25; 3:53-67; 4:5-16; 5:1-6:5; 7:43-67; 10:53-11:10; 11:11-16; 11:17-52; 12:1-12; 12:25-51; 17:3-26; 17:42-18:15; 18:36-55.
8,558,223	wherein the organic compound	2	"wherein the organic compound coordinates to the metal complex in the	Papers and Evidence submitted with IPR 2024-01094 (to the extent not qualified as intrinsic evidence).	<i>See, e.g.,</i> 1:53-2:16; 11:17-31; 11:56-12:21; 13:23-48; 13:61-64; 14:1-18; 18:46-55;

	coordinates to the metal complex due to the joint vaporization		gas phase after the organic compound and the metal complex are jointly vaporized”	Any extrinsic evidence relied upon by Plaintiff. Samsung intends to rely on expert testimony of Dr. E. Fred Schubert. Dr. Schubert, an expert in the field of the '223 patent, may provide testimony in support of Samsung's proposed construction.	
8,558,223	coordinate[s]	2, 11, 14	“form[s] a dative bond with”	The New Oxford American Dictionary, Second Edition (2005) (“coordinate”: “<i>v . . . 2 Chemistry</i> form a coordinate bond to (an atom or molecule): the sodium atom is coordinated to two oxygen atoms. . . . <i>adj. . . . 2 Chemistry</i> denoting a type of covalent bond in which one atom provides both the shared electrons.”). The New Oxford American Dictionary, Second Edition (2005) (“coordination”: “<i>2 Chemistry</i> the linking of atoms by coordinate bonds”). McGraw-Hill Dictionary of Scientific and Technical Terms, Sixth Edition (2003) (“coordinate bond”: “<i>See</i> coordinate valence.”).	<i>See, e.g.,</i> 1:60-2:38; 2:42-67; 3:4-45; 3:53-67; 4:5-16; 7:43-67; 10:53-11:10; 11:17-52; 12:1-21; 12:29-51; 13:34-60; 14:9-18.

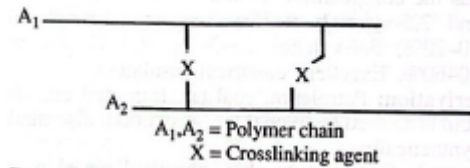
				McGraw-Hill Dictionary of Scientific and Technical Terms, Sixth Edition (2003) (“coordinate valence”: “[chem] A chemical bond between two atoms in which a shared pair of electrons forms the bond and the pair has been supplied by one of the two atoms. Also known as coordinate bond; dative bond.”). Dictionary of Science and Technology, Second Edition (2007) (“coordinate bond”: “a chemical bond in which a pair of electrons is shared by two atoms, both of which are supplied by one atom (NOTE: a coordinate bond is a type of covalent bond.)”). Hawley’s Condensed Chemical Dictionary, Fifteenth Edition (2007) (“coordinate bond”: “(dative bond). A covalent bond consisting of a pair of electrons donated by only one of the two atoms it joins.”). Encyclopedia of Chemistry (2005) (“coordinate covalent bond”: “A bond between two atoms in which the shared electrons are contributed by only one of the atoms.”).	
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				Encyclopedia of Chemistry (2005) (“coordination compound (coordination complex)”: “A compound containing coordinate covalent bonds.”). Academic Press Dictionary of Science and Technology (1992) (“coordinate bond”: “<i>Chemistry</i>. A chemical bond between two atoms, or an atom and a group, which share two electrons that are both supplied by one of the atoms or groups. Also, coordinate valence.”). Academic Press Dictionary of Science and Technology (1992) (“coordination compound”: “<i>Chemistry</i>. A compound in which a group of usually nonmetallic atoms or ions (called ligands) are attached by a coordinate bond to a usually metallic central atom or ion. Also, complex compound.”). FHSST Chemistry (2008) at 65 (“A chemical bond is formed when atoms are held together by attractive forces.”), 71 (“A dative covalent bond (also known as a coordinate covalent bond) is a description of	
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				covalent bonding between two atoms in which both electrons shared in the bond come from the same atom. This happens when a Lewis base (an electron donor) donates a pair of electrons to a Lewis acid (an electron acceptor).”), 74 (“In covalent bonding, electrons are shared between the atoms. There is another type of bonding, where electrons are transferred from one atom to another. This is called ionic bonding.”), 76 (“The structure of a metallic bond is quite different from covalent and ionic bonds.”). Papers and Evidence submitted with IPR 2024-01094 (to the extent not qualified as intrinsic evidence). Any extrinsic evidence relied upon by Plaintiff. Samsung intends to rely on expert testimony of Dr. E. Fred Schubert. Dr. Schubert, an expert in the field of the ’223 patent, may provide testimony in support of Samsung’s proposed construction.	
8,558,223	chain-like structure	12	“a structure where two metal complexes are linked by an organic compound or	Papers and Evidence submitted with IPR 2024-01094 (to the extent not	See, e.g., 2:28-67; 7:48-53; 10:59-64; 11:11-52; 13:49-

			a structure where two organic compounds are linked by a metal complex”	qualified as intrinsic evidence). Any extrinsic evidence relied upon by Plaintiff. Samsung intends to rely on expert testimony of Dr. E. Fred Schubert. Dr. Schubert, an expert in the field of the '223 patent, may provide testimony in support of Samsung's proposed construction.	14:8; cl. 8.
8,558,223	network-like structure	12	“a structure where more than two metal complexes are linked by an organic compound or a structure where more than two organic compounds are linked by a metal complex”	Papers and Evidence submitted with IPR 2024-01094 (to the extent not qualified as intrinsic evidence). Any extrinsic evidence relied upon by Plaintiff. Samsung intends to rely on expert testimony of Dr. E. Fred Schubert. Dr. Schubert, an expert in the field of the '223 patent, may provide testimony in support of Samsung's proposed construction.	<i>See, e.g.</i> , 2:28-67; 7:48-53; 10:59-64; 11:11-52; 13:49-14:8; cl. 8.
8,558,223	degree of cross-linking of the electron-conducting layer	13	Indefinite	McGraw-Hill Dictionary of Scientific and Technical Terms, Sixth Edition (2003) (“crosslinking”: “[org chem] The setting up of chemical links between the molecular chains of polymers.”).	<i>See, e.g.</i> , 2:28-67; 7:48-53; 10:59-64; 11:11-52; 13:49-14:8; cl. 8.

				Chambers Dictionary of Science and Technology (2007) (“cross-linking”: “(Chem) The formation of side bonds between different chains in a polymer, thus increasing its rigidity. Usually achieved in rubbers with sulphur to give disulphidic or polysulphidic links between vicinal carbon atoms. Physical cross-links are used in thermoplastic elastomers to provide elastomeric properties. See panels on elastomers and thermosets.”). A Dictionary of Chemistry, Fifth Edition (2004) (“cross linkage”: “A short side chain of atoms linking two longer chains in a polymeric material.”). Hawley’s Condensed Chemical Dictionary, Fifteenth Edition (2007) (“cross-linking”: “Attachment of two chains of polymer molecules by bridges, composed of either an element, a group, or a compound, that join certain carbon atoms of the chains by primary chemical bonds, as indicated in the schematic diagram.”).	
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Academic Press Dictionary of Science and Technology (1992) (“cross-linking”: “*Organic Chemistry*. The attachment of chains of a polymer to one another to make the polymer into a single network with increased strength and resistance to solvents.”).

Academic Press Dictionary of Science and Technology (1992) (“cross-link density”: “*Materials Science*. the density or extensiveness of chemical links that form between two polymers or between polymers and other substances.”).

Papers and Evidence submitted with IPR 2024-01094 (to the extent not qualified as intrinsic evidence).

Any extrinsic evidence relied upon by Plaintiff.

Samsung intends to rely on expert

				testimony of Dr. E. Fred Schubert. Dr. Schubert, an expert in the field of the '223 patent, may provide testimony in support of Samsung's proposed construction.	
8,723,164	matrix	1-6, 10, 13-16	"a continuous phase of the mixture of matrix materials"	A Dictionary of Chemistry, Fifth Edition (2004) ("matrix": "1. (<i>in chemistry</i>) A continuous solid phase in which particles (atoms, ions, etc.) are embedded."). Chambers Dictionary of Science and Technology (2007) ("matrix": "(<i>BioSci</i>) More or less continuous matter in which something is embedded"). Mechanics of Composite Materials (Second Edition) (2006) at 2 ("A composite is a structural material that consists of two or more combined constituents that are combined at a macroscopic level and are not soluble in each other. One constituent is called the reinforcing phase and the one in which it is embedded is called the matrix. The reinforcing phase material may be in the form of fibers, particles, or flakes. The matrix phase materials are generally continuous.").	See, e.g., Abstract, Fig. 2 and associated description in the specification, 1:33-59; 2:1-3:34; 4:10-5:17; 6:13-56; 7:53-61; 8:52-55.

				Engineering Mechanics of Composite Materials (Second Edition) (2006) at 1 (“A structural composite is a material system consisting of two or more phases on a macroscopic scale, whose mechanical performance and properties are designed to be superior to those of the constituent materials acting independently. One of the phases is usually discontinuous, stiffer, and stronger and is called the reinforcement, whereas the less stiff and weaker phase is continuous and is called the matrix (Fig. 1.1).”). U.S. Patent No. 7,781,961, <i>passim</i>. U.S. Patent No. 7,919,010, <i>passim</i>. U.S. Patent No. 8,258,501, <i>passim</i>. U.S. Patent No. 8,502,200, <i>passim</i>. U.S. Patent No. 8,546,816, <i>passim</i>. U.S. Patent No. 8,558,223 at col. 16. Ansgar Werner, <i>N-type doping of organic thin films using a novel class</i>	
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				<i>of dopants</i> (2003), <i>passim</i>. Papers and Evidence submitted with IPR 2024-01093 (to the extent not qualified as intrinsic evidence). Any extrinsic evidence relied upon by Plaintiff. Samsung intends to rely on expert testimony of Dr. E. Fred Schubert. Dr. Schubert, an expert in the field of the '164 patent, may provide testimony in support of Samsung's proposed construction.	
8,723,164	matrix material	1-6, 10, 13-16	The first, second, and third matrix materials are different materials and are part of the same matrix.	The New Oxford American Dictionary, Second Edition (2005) ("material": "1 the matter from which a thing is or can be made"). All citations listed above for "matrix." Papers and Evidence submitted with IPR 2024-01093 (to the extent not qualified as intrinsic evidence). Any extrinsic evidence relied upon by Plaintiff.	<i>See, e.g.</i>, Abstract, Fig. 2 and associated description in the specification, 1:33-59; 2:1-3:34; 4:10-5:17; 6:13-56; 7:53-61; 8:52-55.

				Samsung intends to rely on expert testimony of Dr. E. Fred Schubert. Dr. Schubert, an expert in the field of the '164 patent, may provide testimony in support of Samsung's proposed construction.	
8,723,164	charge carrier mobility	4, 16	Indefinite	Papers and Evidence submitted with IPR 2024-01093 (to the extent not qualified as intrinsic evidence). Any extrinsic evidence relied upon by Plaintiff. Samsung intends to rely on expert testimony of Dr. E. Fred Schubert. Dr. Schubert, an expert in the field of the '164 patent, may provide testimony in support of Samsung's proposed construction.	<i>See, e.g.,</i> Fig. 4 and associated description in the specification; 1:33-36; 2:1-9; 2:30-45; 2:58-3:52; 3:64-4:2; 4:29-43; 5:3-17; 6:57-7:10.
8,723,164	A method for the production of an electronic device according to claim 1, comprising the steps of:	13	Indefinite	Papers and Evidence submitted with IPR 2024-01093 (to the extent not qualified as intrinsic evidence). Any extrinsic evidence relied upon by Plaintiff. Samsung intends to rely on expert testimony of Dr. E. Fred Schubert. Dr. Schubert, an expert in the field of the '164 patent, may provide testimony in support of Samsung's	

				proposed construction.	
9,257,492	applied in a structured fashion / applying . . . in a structured fashion	1, 9, 10, 16	“applied / applying . . . such that the desired structure is already formed during the application of the corresponding layer, in contrast to planar application of the corresponding layers and subsequent structuring of the layers, as is the case for example in a photolithographic method.”	DE 10-2012-109142. Papers and Evidence submitted with IPR 2024-01187 (to the extent not qualified as intrinsic evidence). Any extrinsic evidence relied upon by Plaintiff. Samsung intends to rely on expert testimony of Dr. E. Fred Schubert. Dr. Schubert, an expert in the field of the ’492 patent, may provide testimony in support of Samsung’s proposed construction.	<i>See, e.g.</i> , 1:65-2:14; DE 10-2012-109142
9,257,492	optoelectronic component	10	“An electrical or electronic component that converts optical energy into electrical energy, converts electrical energy into optical energy, or both”	Wiley Electrical And Electronics Engineering Dictionary; Steve M. Kaplan; John Wiley & Sons, Inc., 2004 (“ optoelectronic device Also spelled opto-electronic device. 1. A device which converts optical energy into electrical energy. Also, a device which converts an optical signal into an electrical signal. An example is a photodiode. 2. A device which converts electrical energy into optical energy. Also, a device which converts on electrical signal into an optical signal. An example is an	<i>See, e.g.</i> , claim 13, claim 14; 4:46-63; 6:23-31; 8:31-48; 15:9-12; 20:5-15

				LED. 3. A device, such as a laser, which combines optics and electronics.”). McGraw-Hill Dictionary Of Scientific And Technical Terms, Sixth Edition, The McGraw-Hill Companies, Inc., 2003 (“optoelectronics [ELECTR] 1. The branch of electronics that deals with solid-state and other electronic devices for generating, modulating, transmitting, and sensing electromagnetic radiation in the ultraviolet, visible-light, and infrared portions of the spectrum.”). A Dictionary of Physics, Fifth Edition, Oxford University Press, 2005 (“optoelectronics The branch of *electronics concerned with electronic devices (frequently solid-state devices) for generating, transmitting, modulating, and detecting *electromagnetic radiation, especially at optical, ultraviolet, and infrared frequencies.”). A Dictionary of Electronics and Electrical Engineering (Oxford Quick Reference) by Andrew Butterfield, John Szymanski (“optoelectronics[:]	
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				The study and design of electronic devices that manipulate light in some way. These range from photodetectors that convert light into electricity to semiconductor lasers and *light-emitting diodes. The underlying theory is largely based on the principles of quantum physics. See also optical electronics.”). Papers and Evidence submitted with IPR 2024-01187 (to the extent not qualified as intrinsic evidence). Any extrinsic evidence relied upon by Plaintiff. Samsung intends to rely on expert testimony of Dr. E. Fred Schubert. Dr. Schubert, an expert in the field of the '492 patent, may provide testimony in support of Samsung’s proposed construction.	
9,257,492	passive electronic component	1, 10, 16	“an electronic component, such as a capacitor or a resistor, that is neither active nor an optoelectronic component”; phrase is limiting to the extent it is in a preamble	IEEE 100 The Authoritative Dictionary of IEEE Standards Terms, Seventh Edition, Standards information Network, IEEE Press, 2000 (“passive device A device that does not require power and contains no active components. The term encompasses taps, directional couplers, splitters, power inserters,	See, e.g., claim 13; claim 14; 2:20-21; 4:35-41; 8:29-31; 8:31-34; 20:5-15

				and in-line equalizers”). Wiley Electrical And Electronics Engineering Dictionary; Steve M. Kaplan; John Wiley & Sons, Inc., 2004 (“passive component An electronic component, such as a capacitor or resistor, that can not operate on an applied electrical signal, as in amplifying, rectifying, or switching, nor is a source of energy.”). McGraw-Hill Dictionary Of Scientific And Technical Terms, Sixth Edition, The McGraw-Hill Companies, Inc., 2003 (“passive component See passive element.”; “passive element [ELEC] An element of an electric circuit that is not a source of energy, such as a resistor, inductor, or capacitor. Also known as a passive component.”). A Dictionary of Physics, Fifth Edition, Oxford University Press, 2005 (“passive device 1. An electronic component, such as a capacitor or resistor, that is incapable of amplification. . . . Compare ACTIVE DEVICE.”).	
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				Oxford Dictionary of English, Third Edition, Angus Stevenson (ed.), Oxford University Press, 2010 (“passive . . . 3 (of a circuit or device) containing no source of electromotive force.”). Papers and Evidence submitted with IPR 2024-01187 (to the extent not qualified as intrinsic evidence). Any extrinsic evidence relied upon by Plaintiff.	
9,257,492	plurality of capacitors and/or resistors	6	Indefinite.	Papers and Evidence submitted with IPR 2024-01187 (to the extent not qualified as intrinsic evidence). Any extrinsic evidence relied upon by Plaintiff. Samsung intends to rely on expert testimony of Dr. E. Fred Schubert. Dr. Schubert, an expert in the field of the '492 patent, may provide testimony in support of Samsung's proposed construction.	See, e.g., claims 1-5; March 25, 2015 Preliminary Amendment
9,257,492	a resistance region . . . which has a taper in a direction	3	Indefinite.	Wiley Electrical And Electronics Engineering Dictionary; Steve M. Kaplan; John Wiley & Sons, Inc., 2004 (“taper 1. A gradual reduction in the thickness, width, or diameter of	See, e.g., claim 1; Figure 10 and associated description in the specification; 13:1-14.

	parallel to the electrically conductive layers			an object or section. Also, the overall reduction in thickness, width, or diameter, per unit length. 2. A gradual reduction in intensity or amplitude. Also, the rate of such a reduction per unit time, length, or the like. 3. A uniform rate of change in a property which is proportional to a change in a mechanical position or setting such as rotation or length. For example, the changes in resistance in a potentiometer as a sliding tap is moved, or a change in the cross-section of a waveguide.”). McGraw-Hill Dictionary Of Scientific And Technical Terms, Sixth Edition, The McGraw-Hill Companies, Inc., 2003 (“taper [AERO ENG] An airfoil feature in which either the thickness or the chord length or both decrease from the root to the tip. [ELEC] Continuous or gradual change in electrical properties with mechanical position such as rotation or length; for example, continuous change of cross section of a waveguide, or distribution of resistance in a potentiometer.”). Oxford Dictionary of English, Third	
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				Edition, Angus Stevenson (ed.), Oxford University Press, 2010 (“taper verb diminish or reduce in thickness toward one end: [no obj] the . . . noun . . . a gradual narrowing”). Papers and Evidence submitted with IPR 2024-01187 (to the extent not qualified as intrinsic evidence). Any extrinsic evidence relied upon by Plaintiff. Samsung intends to rely on expert testimony of Dr. E. Fred Schubert. Dr. Schubert, an expert in the field of the ’492 patent, may provide testimony in support of Samsung’s proposed construction.	
9,257,492	second trench	3	“second trench in the first or second electrically conductive layer, or in both such layers”	Papers and Evidence submitted with IPR 2024-01187 (to the extent not qualified as intrinsic evidence). Any extrinsic evidence relied upon by Plaintiff. Samsung intends to rely on expert testimony of Dr. E. Fred Schubert. Dr. Schubert, an expert in the field of the ’492 patent, may provide	<i>See, e.g.</i>, claim 1; Figure 4 and associated description in the specification; Figure 9 and associated description in the specification; 11:40-44

				testimony in support of Samsung's proposed construction.	
9,257,492	third trench	3	"third trench in the first or second electrically conductive layer, or in both such layers"	Papers and Evidence submitted with IPR 2024-01187 (to the extent not qualified as intrinsic evidence). Any extrinsic evidence relied upon by Plaintiff. Samsung intends to rely on expert testimony of Dr. E. Fred Schubert. Dr. Schubert, an expert in the field of the '492 patent, may provide testimony in support of Samsung's proposed construction.	<i>See, e.g.</i>, claim 1; Figure 4 and associated description in the specification; Figure 9 and associated description in the specification; 11:40-44
9,257,492	applying an electrically conductive electrode layer in a structured fashion to the dielectric above the first contact region and to the second contact region	1	"applying an electrically conductive electrode layer in a structured fashion to the dielectric above, and insulated from, the first contact region, and to the second contact region."	Papers and Evidence submitted with IPR 2024-01187 (to the extent not qualified as intrinsic evidence). Any extrinsic evidence relied upon by Plaintiff. Samsung intends to rely on expert testimony of Dr. E. Fred Schubert. Dr. Schubert, an expert in the field of the '492 patent, may provide testimony in support of Samsung's proposed construction.	<i>See, e.g.</i>, claims 10, 16; Figure 7 and associated description in the specification; 1:58-65; 2:3-4; 3:38-47; 6:60-7:1; 11:47-56; 12:29-31; 12:31-36

9,257,492	an electrically conductive electrode layer, which is applied in a structured fashion to the dielectric above the first contact region and to the second contact region	10	“an electrically conductive electrode layer, which is applied in a structured fashion above, and insulated from, the first contact region, and to the second contact region”	Papers and Evidence submitted with IPR 2024-01187 (to the extent not qualified as intrinsic evidence). Any extrinsic evidence relied upon by Plaintiff. Samsung intends to rely on expert testimony of Dr. E. Fred Schubert. Dr. Schubert, an expert in the field of the '492 patent, may provide testimony in support of Samsung's proposed construction.	See, e.g., claims 1, 16; Figure 7 and associated description in the specification; 1:58-65; 2:3-4; 3:38-47; 6:60-7:1; 11:47-56; 12:29-31; 12:31-36
9,257,492	an electrically conductive electrode layer, which is applied in a structured fashion on the dielectric above the first contact region and at least partly on the second contact region	16	“an electrically conductive electrode layer, which is applied in a structured fashion on the dielectric above, and insulated from, the first contact region, and at least partly on the second contact region”	Papers and Evidence submitted with IPR 2024-01187 (to the extent not qualified as intrinsic evidence). Any extrinsic evidence relied upon by Plaintiff. Samsung intends to rely on expert testimony of Dr. E. Fred Schubert. Dr. Schubert, an expert in the field of the '492 patent, may provide testimony in support of Samsung's proposed construction.	See, e.g., claims 1, 10; Figure 7 and associated description in the specification; 1:58-65; 2:3-4; 3:38-47; 6:60-7:1; 11:47-56; 12:29-31; 12:31-36
11,828,425	the organic layer sequence	1	“the organic layer sequence comprises at least	Papers and Evidence submitted with IPR 2024-01095 (to the extent not	See, e.g., Abstract; 1:26-49; 1:54-63; 24:45-54; 67:57-68:17

	comprises at least one radiation-emitting region configured to generate electromagnetic radiation in a spectral range from infrared radiation to UV radiation during operation		one radiation-emitting region configured to generate electromagnetic radiation in a spectral range that includes the full spectrum from infrared radiation to UV radiation during operation”	qualified as intrinsic evidence). Any extrinsic evidence relied upon by Plaintiff. Samsung intends to rely on expert testimony of Dr. E. Fred Schubert. Dr. Schubert, an expert in the field of the ’425 patent, may provide testimony in support of Samsung’s proposed construction.	
11,828,425	encapsulation	1, 3-4, 18	“a seal of the organic layer sequence against environmental influences”	Papers and Evidence submitted with IPR 2024-01095 (to the extent not qualified as intrinsic evidence). Any extrinsic evidence relied upon by Plaintiff. Samsung intends to rely on expert testimony of Dr. E. Fred Schubert. Dr. Schubert, an expert in the field of the ’425 patent, may provide testimony in support of Samsung’s proposed construction.	See, e.g., Abstract; 1:28-38; 5:63-6:5; 6:50-64; 7:21-10:58

Additionally, Samsung discloses Prof. E. Fred Schubert as an expert who may provide opinions regarding claim construction. For the '164, '223, '547, '389, '425, and '492 patents, Prof. Schubert may provide testimony regarding the level of ordinary skill in the art, the understanding of a person of ordinary skill in the art of the claim terms identified above, the prosecution history, relevant extrinsic evidence, and responses to any testimony offered by Pictiva's experts or claim construction positions offered by Pictiva.