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

PICTIVA DISPLAYS INTERNATIONAL LTD., *Plaintiff*, v. SAMSUNG ELECTRONIC CO., LTD and SAMSUNG ELECTRONICS AMERICA, INC., *Defendants*.	Civil Action No. 2:23-cv-00495-JRG **JURY TRIAL DEMANDED**

SAMSUNG'S PROPOSED CLAIM CONSTRUCTIONS FOR THE TERMS AND PHRASES IDENTIFIED FOR CONSTRUCTION PER LOCAL PATENT RULE 4-2

Pursuant to the Procedural Schedule governing this case and Local Patent Rule 4-2, Defendants Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. (collectively, "Samsung" or "Defendants") provide the below preliminary claim constructions and extrinsic evidence for the claim terms identified by the parties for claim construction for exchange with Pictiva Displays International Ltd. ("Plaintiff").

The proposed terms, phrases, or clauses are identified for construction wherever they appear in any claim element in any of the asserted patents, including all dependent claims or claims where multiple terms appear in combination. Defendants propose only the terms and claim elements for construction that appear in the claims asserted against them in Plaintiff's Infringement Contentions. Nothing in this disclosure shall be construed to waive Plaintiff's requirement to assert a claim against Defendants pursuant to Local Patent Rule 3-1.

The proposed terms, phrases, or clauses for construction are based on information reasonably available to Defendants at this time. Defendants' investigation and discovery are ongoing, and Defendants therefore expressly reserve the right to amend, modify, and add to this

list of terms based on continuing investigation and discovery. Further, Defendants reserve the right to modify this disclosure once it has reviewed Plaintiff's concurrently proposed claim constructions and in light of arguments made or positions taken by Plaintiff during the meet and confer process and as this case proceeds.

Additionally, the inclusion of any claim terms, phrases, or clauses on this list is not intended to and does not constitute an admission that the term or phrase is capable of construction and not indefinite under 35 U.S.C. § 112, lacking enablement or adequate written description, or otherwise incapable of construction. For example, Defendants reserve the right to argue that a particular claim term is indefinite and/or fails to satisfy the written description and enablement requirements, regardless of whether the term has been proposed for construction, has not been proposed for construction, and/or was initially proposed for construction but has since been dropped from the terms proposed for construction.

Pursuant to Local Patent Rule 4-2(a) and (b), Defendants provide below their proposed preliminary constructions for each claim term/phrase proposed by Defendants and Plaintiff. Defendants further identify a list of exemplary claims within which the term, phrase, or clause is found. The identified claims listed in this disclosure are representative. A construction of a term, phrase, or clause applies equally to variations or other instances of that term, phrase, or clause in any of the asserted claims. Furthermore, to the extent a term, phrase, or clause renders a claim indefinite, all claims depending from that claim are similarly indefinite.

Defendants reserve the right to amend or otherwise supplement their identification of supporting evidence that may be used to support, describe, or explain Defendants' proposed preliminary claim constructions. Defendants further reserve the right to identify additional extrinsic evidence that is obtained through further discovery in this matter.

While it is not extrinsic evidence, Defendants may also rely on the file histories of the patents in suit and the file histories of any domestic or foreign related patents. Defendants may also rely on Plaintiff's Infringement Contentions and materials cited therein, and Defendants' Invalidity Contentions and materials cited therein. Further, Defendants may rely on any declarations, reports, or testimony by the named inventors or experts on behalf of Plaintiff in this case, other cases, or Patent Office proceedings, regarding the asserted technology. Defendants reserve the right to provide expert testimony relating to any issue on which Plaintiff offers expert testimony.

Pursuant to Local Patent Rule 4-2(c), Defendants are prepared to meet and confer with Plaintiff at a mutually agreeable time for the purposes of finalizing a combined list, narrowing or resolving differences, and facilitating the ultimate preparation of a Joint Claim Construction and Prehearing Statement.

Patent	Term	Claims	Proposed Construction	Extrinsic 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.
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 ("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.
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	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 monomer (this material is then subjected to ultraviolet light, crosslinking the monomer to form a polyacrylate). Preferred planarizing

Patent	Term	Claims	Proposed Construction	Extrinsic Evidence
			underlying layer is not reproduced."	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."). 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

Patent	Term	Claims	Proposed Construction	Extrinsic Evidence
				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 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 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.

Patent	Term	Claims	Proposed Construction	Extrinsic Evidence
6,949,389	selectively depositing	34, 35, 41	Plain and ordinary meaning; no construction necessary	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 agent) affecting some things and not others: *modern pesticides are more selective in effect.*"; "**selectivity ‣ noun** [mass noun] the quality of carefully choosing someone or something as the best or most suitable: *provision is organized on the principle of selectivity* ■ 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.
6,949,389	depositing a mask	41, 44, 45	Plain and ordinary meaning; no construction necessary.	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.
6,949,389	depositing at least one planarization layer upon said mask and said plurality of devices; removing said mask from said substrate	41	"depositing at least one planarization layer upon said mask and said plurality of devices; then removing said mask from said substrate"	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.

Patent	Term	Claims	Proposed Construction	Extrinsic Evidence
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.
8,314,547	a filter layer which is at least partially opaque to an electromagnetic radiation having a third wavelength spectrum which corresponds to at least one part of the second wavelength	1	"a filter layer which is not transparent to an electromagnetic radiation having a third wavelength spectrum which corresponds to at least one part of the second wavelength spectrum"	Papers and Evidence submitted with IPR 2024-00855 (to the extent not qualified as intrinsic evidence). Any extrinsic evidence relied upon by Plaintiff.

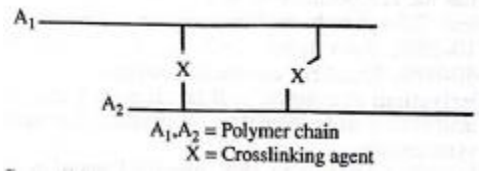
Patent	Term	Claims	Proposed Construction	Extrinsic Evidence
	spectrum			
8,314,547	the filter layer is transparent to the electromagnetic radiation having the first wavelength spectrum	1	"the filter layer is transparent to the electromagnetic radiation having the first entire wavelength spectrum so the emission passes through the filter without any alteration of its spectral components"	Papers and Evidence submitted with IPR 2024-00855 (to the extent not qualified as intrinsic evidence). Any extrinsic evidence relied upon by Plaintiff.
8,314,547	the first and second regions of the structured layer are arranged laterally in a beam path of the optoelectronic device	1	"the first and second regions of the structured layer are arrange adjacent to one another, rather than arranged in a manner stacked one above another in a beam path of the optoelectronic device"	Papers and Evidence submitted with IPR 2024-00855 (to the extent not qualified as intrinsic evidence). Any extrinsic evidence relied upon by Plaintiff.
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.
8,558,223	metal complex	1, 2, 10, 11,	"a metal complex that is not a compound composed of one or more metal atoms	Papers and Evidence submitted with IPR 2024-01094 (to the extent not qualified as intrinsic evidence).

Patent	Term	Claims	Proposed Construction	Extrinsic Evidence
		13, 14	and one or more oxygen atoms”	Any extrinsic evidence relied upon by Plaintiff.
8,558,223	wherein the organic compound coordinates to the metal complex due to the joint vaporization	2	“wherein the organic compound coordinates to the metal complex in the gas phase after the organic compound and the metal complex are jointly vaporized”	Papers and Evidence submitted with IPR 2024-01094 (to the extent not qualified as intrinsic evidence). Any extrinsic evidence relied upon by Plaintiff.
8,558,223	coordinate[s]	2, 14	“form[s] a dative bond with”	The New Oxford American Dictionary, Second Edition (2005) (“coordinate”: “*v* . . . 2 *Chemistry* form a coordinate bond to (an atom or molecule): the sodium atom is coordinated to two oxygen atoms. . . . . *adj.* . . . 2 *Chemistry* denoting a type of covalent bond in which one atom provides both the shared electrons.”). The New Oxford American Dictionary, Second Edition (2005) (“coordination”: “2 *Chemistry* the linking of atoms by coordinate bonds”). McGraw-Hill Dictionary of Scientific and Technical Terms, Sixth Edition (2003) (“coordinate bond”: “*See* coordinate valence.”). 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

Patent	Term	Claims	Proposed Construction	Extrinsic Evidence
				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.”). Encyclopedia of Chemistry (2005) (“coordination compound (coordination complex)”: “A compound containing coordinate covalent bonds.”). Academic Press Dictionary of Science and Technology (1992) (“coordinate bond”: “*Chemistry.* 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)

Patent	Term	Claims	Proposed Construction	Extrinsic Evidence
				("coordination compound": "*Chemistry*. 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 71 ("A dative covalent bond (also known as a coordinate covalent bond) is a description of 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)."). Papers and Evidence submitted with IPR 2024-01094 (to the extent not qualified as intrinsic evidence). Any extrinsic evidence relied upon by Plaintiff.
8,558,223	chain-like structure	12	"a structure where two metal complexes are linked by an organic compound or a structure where 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.
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	Papers and Evidence submitted with IPR 2024-01094 (to the extent not qualified as intrinsic evidence). Any extrinsic evidence relied upon by Plaintiff.

Patent	Term	Claims	Proposed Construction	Extrinsic Evidence
			complex”	
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.”). 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.”).

Patent	Term	Claims	Proposed Construction	Extrinsic Evidence
				 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.
8,558,223	heteroaromatic compound	1, 10	Plain and ordinary meaning; no construction necessary	The New Oxford American Dictionary, Second Edition (2005) ("heteroaromatic": "*Chemistry* denoting an organic compound with a ring structure that is both heterocyclic and aromatic"). The New Oxford American Dictionary, Second Edition (2005) ("heterocyclic": "*Chemistry* denoting a compound whose molecule contains a ring of atoms of at least two elements (one of which is generally carbon)").

Patent	Term	Claims	Proposed Construction	Extrinsic Evidence
				Hawley's Condensed Chemical Dictionary, Fifteenth Edition (2007) ("heteroaromatic": "See heterocyclic"). Hawley's Condensed Chemical Dictionary, Fifteenth Edition (2007) ("heterocyclic": "Designating a closed-ring structure, usually of either 5 or 6 members, in which one or more of the atoms in the ring is an element other than carbon, e.g., sulfur, nitrogen, etc."). Papers and Evidence submitted with IPR 2024-01094 (to the extent not qualified as intrinsic evidence). Any extrinsic evidence relied upon by Plaintiff.
8,558,223	aromatic compound	1, 10	Plain and ordinary meaning; no construction necessary	The New Oxford American Dictionary, Second Edition (2005) ("aromatic": "2 *Chemistry* (of an organic compound) containing a planar unsaturated ring of atoms that is stabilized by an interaction of the bonds forming the ring. Such compounds are typified by benzene and its derivatives. Compare with alicyclic."). McGraw-Hill Dictionary of Scientific and Technical Terms, Sixth Edition (2003) ("aromatic": "[org chem] 1. Pertaining to or characterized by the presence of at least one benzene ring. 2. Describing those compounds having physical and chemical properties resembling those of benzene."). Dictionary of Science and Technology, Second Edition (2007) ("aromatic compound": "a compound such as benzene, with a

Patent	Term	Claims	Proposed Construction	Extrinsic Evidence
				ring of carbon atoms held by single and double bonds”). Chambers Dictionary of Science and Technology (2007) (“aromatic compounds”: “(*Chem*) Planar organic ring compounds such as benzene that have a cyclic cloud of delocalized electrons above and below the ring. The chemical bonding between adjacent atoms is intermediate between single and double bonds. Aromatic compounds do not undergo addition reactions as other unsaturated compounds do, but show substitution reactions in which hydrogens on the ring are replaced with other molecular species. Heterocyclic compounds such as pyridine also show aromatic properties. Lighter members of the aromatic series have characteristic ‘aromatic’ odours.”). A Dictionary of Chemistry, Fifth Edition (2004) (“aromatic compound”: “An organic compound that contains a benzene ring in its molecules or that has chemical properties similar to benzene.”). Papers and Evidence submitted with IPR 2024-01094 (to the extent not qualified as intrinsic evidence). Any extrinsic evidence relied upon by Plaintiff.
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. (*in chemistry*) A continuous solid phase in which particles (atoms, ions, etc.) are embedded.”).

Patent	Term	Claims	Proposed Construction	Extrinsic Evidence
				Chambers Dictionary of Science and Technology (2007) ("matrix": "(*BioSci*) More or less continuous matter in which something is embedded"). U.S. Patent No. 7,781,961, *passim*. U.S. Patent No. 7,919,010, *passim*. U.S. Patent No. 8,258,501, *passim*. U.S. Patent No. 8,502,200, *passim*. U.S. Patent No. 8,546,816, *passim*. U.S. Patent No. 8,558,223 at col. 16. Ansgar Werner, *N-type doping of organic thin films using a novel class of dopants* (2003), *passim*. Papers and Evidence submitted with IPR 2024-01093 (to the extent not qualified as intrinsic evidence). Any extrinsic evidence relied upon by Plaintiff.
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").

Patent	Term	Claims	Proposed Construction	Extrinsic Evidence
				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.
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.
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.
9,257,492	applied in a structured fashion / applying . . . in a structured fashion / 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	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.

Patent	Term	Claims	Proposed Construction	Extrinsic Evidence
			example in a photolithographic method."	
9,257,492	optoelectronic component	10	"an electronic component that manipulates electromagnetic radiation, such as by absorbing or emitting electromagnetic radiation, including an organic light emitting diode."	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 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

Patent	Term	Claims	Proposed Construction	Extrinsic Evidence
				Szymanski ("optoelectronics[:] 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.
9,257,492	passive electronic component	1, 10, 16	"a passive electronic component, such as a capacitor and/or a resistor, that is not 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, 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.

Patent	Term	Claims	Proposed Construction	Extrinsic Evidence
				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.”). 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.
9,257,492	a resistance region . . . which has a taper in a direction parallel to the electrically conductive layers	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 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

Patent	Term	Claims	Proposed Construction	Extrinsic Evidence
				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 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.
9,257,492	second trench	3	“second trench in the first and second electrically conductive layers”	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	third trench	3	“third trench in the first and the second electrically conductive layers”	Papers and Evidence submitted with IPR 2024-01187 (to the extent not qualified as intrinsic evidence).

Patent	Term	Claims	Proposed Construction	Extrinsic Evidence
				Any extrinsic evidence relied upon by Plaintiff.
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.
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 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.
9,257,492	an electrically conductive electrode layer, which is applied in a structured fashion on the dielectric above	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	Papers and Evidence submitted with IPR 2024-01187 (to the extent not qualified as intrinsic evidence). Any extrinsic evidence relied upon by Plaintiff.

Patent	Term	Claims	Proposed Construction	Extrinsic Evidence
	the first contact region and at least partly on the second contact region		second contact region”	
11,828,425	the organic layer sequence comprises at least one radiation-emitting region configured to generate electromagnetic radiation in a spectral range from infrared radiation to UV radiation during operation	1	“the organic layer sequence comprises at least 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”	Papers and Evidence submitted with IPR 2024-01095 (to the extent not qualified as intrinsic evidence). Any extrinsic evidence relied upon by Plaintiff.
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.
11,828,425	volume structure	4	“any structure ranging from polycrystalline to polyamorphous, including crystalline, partly crystalline and/or	Papers and Evidence submitted with IPR 2024-01095 (to the extent not qualified as intrinsic evidence). Any extrinsic evidence relied upon by Plaintiff.

Patent	Term	Claims	Proposed Construction	Extrinsic Evidence
			polycrystalline or completely amorphous structures”	

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.

Dated: October 22, 2024

Respectfully submitted,

By: */s/ Lance Yang*

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

The undersigned hereby certifies that a true and correct copy of the foregoing was served on counsel of record for Plaintiff via electronic mail on October 22, 2024.

/s/ George MacCabe