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Attorneys for Defendants  
CHIMEI INNOLUX CORPORATION,  
CHIMEI OPTOELECTRONICS USA, INC.,  
ACER AMERICA CORPORATION,  
VIEWSONIC CORPORATION,  
VIZIO, INC.

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

SEMICONDUCTOR ENERGY  
LABORATORY CO., LTD.,

Plaintiff,

v.

CHIMEI INNOLUX CORPORATION,  
CHI MEI OPTOELECTRONICS USA,  
INC., ACER AMERICA  
CORPORATION, VIEWSONIC  
CORPORATION, VIZIO, INC., and  
WESTINGHOUSE DIGITAL, LLC,

Defendants.

CASE NO. SACV12-0021-JST (JPRx)

**SUPPLEMENTAL DECLARATION  
OF GREGORY S. CORDREY IN  
SUPPORT OF DEFENDANTS'  
MOTION FOR STAY PENDING  
OUTCOME OF INTER PARTES  
REVIEW**

Date: December 21, 2012  
Time: 2:30 p.m.  
Place: Hon. Josephine Staton Tucker  
Courtroom 10A  
411 W. 4th St. # 1-053  
Santa Ana, California

**DECLARATION OF GREGORY S. CORDREY**

I, Gregory S. Cordrey, declare and state:

1. I am an attorney with Jeffer Mangels Butler & Mitchell LLP, counsel for Chimei Innolux Corporation, Chi Mei Optoelectronics USA, Inc., Acer America Corporation, ViewSonic Corporation, and VIZIO, Inc. (collectively, "Defendants"). I submit this supplemental declaration in support of Defendants' Motion to Stay Pending Outcome of Inter Partes Review ("Motion to Stay"). The matters stated below are of my personal knowledge. If called as a witness, I could and would testify competently thereto:

2. This declaration supplements my earlier declaration to provide details regarding the filing of the petitions for *inter partes* review ("IPR") of the patents-in-suit that have occurred subsequent to the filing of CMI's motion on October 22, 2012 (Dkt. No. 100).

3. As stated in Defendants' Motion to Stay, Defendants filed with the U.S. Patent and Trademark Office ("PTO") on October 19, 2012, the first of its petitions for *inter partes* review for U.S. Patent No. 6,404,480 ("480 Patent"). Attached hereto as **Exhibits 1 and 2** are true and correct copies of Defendants' petition for IPR, and supporting expert declaration, respectively. On October 25, 2012 the PTO issued a Notice of Filing Date Accorded to Petition and Notice For Setting the Time Period for Filing Patent Owner Preliminary Response ("Notice"). The Notice accorded the petition a filing date of October 19, 2012 as Case IPR2013-00028 and designated Administrative Patent Judge Sally C. Medley to manage the proceeding. Attached hereto as **Exhibit 3** is a true and correct copy of the Notice issued by the PTO on October 25, 2012.

4. On November 7, 2012, Defendants filed with the U.S. Patent and Trademark Office ("PTO") its petition for IPR for U.S. Patent No. 7,956,978 ("978 Patent"). Attached hereto as **Exhibits 4 and 5** are true and correct copies of

JMBM  
Jeffer Mangels  
Butler & Mitchell LLP

1 Defendants' petition for IPR, and supporting expert declaration, respectively. On  
2 November 9, 2012 the PTO issued a Notice of Filing Date Accorded to Petition and  
3 Notice For Setting the Time Period for Filing Patent Owner Preliminary Response  
4 ("Notice"). The Notice accorded the petition a filing date of November 7, 2012 as  
5 Case IPR2013-00038 and designated Administrative Patent Judge Sally C. Medley to  
6 manage the proceeding. Attached hereto as **Exhibit 6** is a true and correct copy of  
7 the Notice issued by the PTO on November 9, 2012.

8 5. On November 19, 2012, Defendants filed with the U.S. Patent and  
9 Trademark Office ("PTO") its petition for IPR for U.S. Patent No. 7,697,102 ("102  
10 Patent"). Attached hereto as **Exhibits 7 and 8** are true and correct copies of  
11 Defendants' petition for IPR, and supporting expert declaration, respectively. On  
12 November 23, 2012 the PTO issued a Notice of Filing Date Accorded to Petition and  
13 Notice For Setting the Time Period for Filing Patent Owner Preliminary Response  
14 ("Notice"). The Notice accorded the petition a filing date of November 19, 2012 as  
15 Case IPR2013-00060 and designated Administrative Patent Judge Sally C. Medley to  
16 manage the proceeding. Attached hereto as **Exhibit 9** is a true and correct copy of  
17 the Notice issued by the PTO on November 23, 2012.

18 6. On November 26, 2012, Defendants filed with the U.S. Patent and  
19 Trademark Office ("PTO") two petitions for IPR for U.S. Patent No. 7,923,311  
20 ("311 Patent"). Attached hereto as **Exhibits 10 and 11** are true and correct copies of  
21 Defendants' first petition for IPR for the '311 Patent and supporting expert  
22 declaration, respectively. Attached hereto as **Exhibits 12 and 13** are true and correct  
23 copies of Defendants' second petition for IPR for the '311 Patent and supporting  
24 expert declaration, respectively. On November 29, 2012 the PTO issued a Notice of  
25 Filing Date Accorded to Petition and Notice For Setting the Time Period for Filing  
26 Patent Owner Preliminary Response ("Notice") for both of the '311 Patent petitions.  
27 The Notices accorded both of the petitions a filing date of November 26, 2012 as  
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1 Cases IPR2013-00064 and IPR2013-00065, and designated Administrative Patent  
2 Judge Sally C. Medley to manage the proceedings. Attached hereto as **Exhibits 14**  
3 **and 15** are a true and correct copy of the Notices issued by the PTO on November 29,  
4 2012.

5 7. On November 28, 2012, Defendants filed with the U.S. Patent and  
6 Trademark Office ("PTO") its petition for IPR for U.S. Patent No. 7,876,413 ("413  
7 Patent"). Attached hereto as **Exhibits 16 and 17** are true and correct copies of  
8 Defendants' petition for IPR, and supporting expert declaration, respectively. As of  
9 today (November 29, 2012), the PTO has not issued a Notice of Filing Date Accorded  
10 to Petition and Notice For Setting the Time Period for Filing Patent Owner  
11 Preliminary Response ("Notice"). At the time the petition was filed, it was given a  
12 provisional a filing date of November 28, 2012 as Case IPR2013-00066.

13 8. On November 30, 2012, Defendants filed with the U.S. Patent and  
14 Trademark Office ("PTO") its petition for IPR for U.S. Patent No. 8,068,204 ("204  
15 Patent"). Attached hereto as **Exhibits 18 and 19** are true and correct copies of  
16 Defendants' petition for IPR, and supporting expert declaration, respectively. At the  
17 time the petition was filed, it was given a provisional a filing date of November 30,  
18 2012 as Case IPR2013-00068.

19 I declare under penalty of perjury under the laws of the United States of  
20 America, that the foregoing is true and correct.

21 Executed this 29th day of November, 2012, in Irvine, California.

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24 /s/ Gregory S. Cordrey  
25 Gregory S. Cordrey  
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