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10
11 **UNITED STATES DISTRICT COURT**
12 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**

13 SEMICONDUCTOR ENERGY
14 LABORATORY CO., LTD.,

15 Plaintiff,

16 v.

17 CHIMEI INNOLUX CORPORATION,
18 ET AL.,

19 Defendants.

Case No. SACV 12-0021-JST (JPRx)

**DEFENDANT WESTINGHOUSE
DIGITAL'S NOTICE OF JOINDER
AND AGREEMENT TO BE BOUND TO
OUTCOME OF INTER PARTES
REVIEW IF STAY OF PROCEEDINGS
IS GRANTED**

20 **NOTICE OF JOINDER AND AGREEMENT TO BE BOUND TO OUTCOME OF INTER**
21 **PARTES REVIEW IF STAY OF PROCEEDINGS IS GRANTED**

22 Between October 19, 2012 and November 30, 2012, Chimei Innolux Corporation ("CMI")
23 filed seven requests for *Inter Partes* Review ("IPR") of U.S. Patent Nos. 6,404,480 ("480
24 Patent"), 7,956,978 ("978 Patent"), 7,697,102 ("102 Patent"), 7,923,311 ("311 Patent"),
25 8,068,204 ("204 Patent"), and 7,876,413 ("413 Patent") (collectively the "patents-in-suit") with
26 the U.S. Patent and Trademark Office ("PTO").¹

27 On October 22, 2012, Defendants CMI, Chimei Optoelectronics USA, Inc. ("CMO USA"),
28 Acer America Corporation ("Acer"), ViewSonic Corporation ("ViewSonic"), VIZIO, Inc.
("VIZIO"), and (collectively, the "Defendants") filed a Motion to Stay Litigation Pending
Outcome of Inter Partes Review ("Motion").²

¹See Supplemental Cordrey Declaration in support of Motion to Stay Litigation Pending *Inter Partes* Review, Dkt No. 104, and Exhibits 1-19.

²See Dkt No. 100

1 For the reasons set forth in Defendants' Motion, Westinghouse Digital, LLC
2 ("Westinghouse") hereby joins Defendants' motion to stay.

3 Additionally, in the event that the Court grants the Motion and stays the litigation,
4 Westinghouse agrees to be bound by the PTO's determinations on the IPRs pursuant to the
5 estoppel provisions of 35 U.S.C. § 315(e)(2).

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7 Dated: 07 December 2012

Respectfully submitted,

8 /s/ Kyle B Fleming
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16 **CERTIFICATE OF SERVICE**

17 I hereby certify that on this date a true and correct copy of the foregoing will be
18 electronically filed with the Court. Notice of this filing will be automatically sent by the Court's
19 CM/ECF system to all counsel of record.

20 Dated: 07 December 2012

/s/ Kyle B. Fleming
Kyle B. Fleming

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