UNITED STA	ATES PATENT AND TRADEMARK OFFICE
BEFORE TH	HE PATENT TRIAL AND APPEAL BOARD
	INNOLUX CORPORATION

Petitioner,

V.

SEMICONDUCTOR ENERGY LABORATORY CO., LTD. Patent Owner.

Case IPR2013-00028

U.S. Patent 6,404,480

CORRECTED PETITIONER'S REPLY TO RESPONSE OF THE PATENT OWNER



Petitioner, Innolux Corporation, hereby submits a Corrected Petitioner's Reply to the Response of the Patent Owner. This corrected version replaces the first filed version that was timely filed on September 23, 2013, which included typographical errors. Specifically, the below listed corrections were made:

- On Page i, in the Table of Contents, the page number for section B3 was corrected from 5 to 6.
- Page 4, Line 2: ("Ex. 1011"), ¶ 36 corrected to ("Ex. 1011"), ¶ 37, 42
- Page 4, Line 5: Ex. 1011, ¶ 36 corrected to Ex. 1011, ¶ 33,34,39,40
- Page 4, Line 19: Ex. 1011, ¶ 48 corrected to Ex. 1011, ¶ 37,42
- Page 5, Line 5: Ex. 1011, ¶ 75-76, 85 corrected to Ex. 1011, ¶ 37, 42
- Page 5, Line 9: Ex. 1011, ¶ 50 corrected to Ex. 1011, ¶ 37
- Page 6, Line 4: inserted "Ex. 1007, 32;" prior to "Ex. 1011"
- Page 6, Line 4: Ex. 1011, ¶ 52 corrected to Ex. 1011, ¶ 39
- Page 6, Line 17: Ex. 1011, ¶ 53 corrected to Ex. 1011, ¶ 40
- Page 7, Line 5: Ex. 1011, ¶ 53 corrected to Ex. 1011, ¶ 38,40, 41, 46-48
- Page 9, Line 2: Ex. 1011, ¶ 46 corrected to Ex. 1011, ¶ 33,34,41,45
- Page 10, Line 9: Ex. 1011, ¶ 54 corrected to Ex. 1011, ¶ 40-41
- Page 11, Line 15: Ex. 1011, ¶ 35, 45-46 corrected to Ex. 1011, ¶ 38-41,47
- Page 12, Line 3: Ex. 1011, ¶ 56 corrected to Ex 1011, ¶ 41-43
- Page 12, Line 9: inserted "Ex. 1011, ¶ 44" after "Decision at 17."
- Page 12, Line 18: Ex. 1011, ¶ 58 corrected to Ex 1011, ¶ 45
- Page 13, Line 5: Ex. 1011, ¶ 46 corrected to Ex. 1011, ¶ 45
- Page 13, Line 17: Ex. 1011 at ¶¶ 44-47 corrected to Ex. 1011 at ¶¶ 38-41



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PETITIONER'S REPLY TO RESPONSE OF THE PATENT OWNER



I.	,		0, 11, AND 15 OF THE '480 PATENT ARE	
	OBVIOUS (OVER	THE APA IN VIEW OF MORIYAMA	1
	A.		laims are not restricted to a single common contact	1
	В.		APA and Moriyama disclose "a second insulating film g at least two openings"	3
		1.	Moriyama discloses at least two openings in a second insulating film	3
		2.	The APA discloses at least two openings in the second insulating film	5
		3.	It would be obvious to modify the APA to use the multiple openings in the second insulating film shown in Moriyama	6
	C.		rior Art discloses "wherein at least one of said conductions is held over said second interlayer insulating film"	
		1.	Moriyama discloses conductive spacers held over an interlayer insulating film	9
		2.	The use of an interlayer insulating film below the first conductive film was disclosed in the APA	10
		3.	It is obvious to place the conductive spacers on the highest surface	12
	D.	-	rior art discloses the claim limitation "wherein said active spacers are dispersed into a sealing material"	13
II.			D 12 OF THE '480 PATENT ARE OBVIOUS IN VIEW OF MORIYAMA AND OHNO	15
III.	CONCLUSI	ON		15



EXHIBIT LIST

Previously Filed

Exhibit 1001	U.S. Patent No. 6,404,480 to Hirakata
Exhibit 1004	Unexamined Patent Application Publication H5-243333
	("Moriyama")
Exhibit 1007	Declaration of Miltiadis Hatalis, Ph.D.
Exhibit 1005	U.S. Patent No. 4.600,273 to Ohno

Currently Filed

Exhibit 1009	Deposition transcript of Miltiadis Hatalis, Ph.D. dated May
	20, 2013
Exhibit 1010	Deposition transcript of Paul A. Kohl, Ph.D. dated August
	14, 2013
Exhibit 1011	Declaration of Miltiadis Hatalis, Ph.D. in support of Innolux
	Corp.'s Opposition to Amendment and Reply



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