

## **SEL EXHIBIT NO. 2009**

INNOLUX CORP. v. PATENT OF SEMICONDUCTOR ENERGY  
LABORATORY CO., LTD.

IPR2013-00038

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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INNOLUX CORPORATION  
Petitioner

v.

PATENT OF SEMICONDUCTOR ENERGY LABORATORY CO., LTD.  
Patent Owner

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CASE IPR2013-00038  
PATENT 7,956,978

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**[PROPOSED] PATENT OWNER'S INTERROGATORIES TO  
PETITIONER**

Pursuant to the Board's authorization, Patent Owner Semiconductor Energy Laboratory Co., Ltd. ("SEL"), requests that Petitioner Chimei Innolux Corporation ("CMI")<sup>1</sup>, provide answers to the following written Interrogatories to Robinson Intellectual Property Law Office, P.C., 3975 Fair Ridge Drive, Suite 20 North Fairfax, Virginia 22033, c/o Eric Robinson, Esq., within fourteen (14) calendar days after the service hereof.

### **DEFINITIONS**

As used herein, the following words shall have the meanings indicated:

1. The terms "CMI," "you," and "your" mean Petitioner Chimei Innolux Corporation and any of its related companies or entities.
2. The term "Co-Defendants" means Chi Mei Optoelectronics USA, Inc., Acer America Corporation, ViewSonic Corporation, VIZIO, Inc., and Westinghouse Digital, LLC, collectively.
3. The term "communication" means any contact or exchange of information whether written or oral between two or more persons, regardless of the form or medium by which transmitted or on which recorded, including without limitation e-mail, letters, memoranda, facsimile, face-to-face meetings, telephone conversations, and voice mail.

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<sup>1</sup> While Patent Owner acknowledges the name change of the Petitioner, Patent Owner continues to refer to that party as "Chimei Innolux Corporation" or "CMI" in this document.

4. The term “document” has its customary broad meaning within the full range allowed by Rules 33 and 34 of the Federal Rules of Civil Procedure and includes without limitation any written, printed, typed, recorded, filmed or graphic matter, and electronic data however produced or reproduced.

5. The phrase “the ‘978 patent” means U.S. Patent No. 7,956,978.

### **INSTRUCTIONS**

In addition to the above Definitions, the following Instructions shall also apply to these Interrogatories:

1. Information requested in these Interrogatories includes information within the knowledge and possession of CMI or any of CMI’s agents, employees, past and present directors, officers, attorneys, and any other persons, firms or entities directly or indirectly subject to CMI’s control.

2. If any information called for by an Interrogatory is withheld under a claim of privilege or any other claim protecting against disclosure in response to an Interrogatory, state the basis for any asserted claim of privilege or other claim within ten (10) calendar days from the date of service of your responses to these Interrogatories. In particular, for each document, thing or communication, alleged to be privileged identify at least the following:

- (a) its general description;
- (b) its date;

- (c) the name and title of its author(s);
- (d) the name and title of its recipient(s);
- (e) its subject matter;
- (f) its number of pages;
- (g) the nature of the privilege claimed and facts upon which you rely to support the claim of privilege; and
- (h) the number of the Interrogatory to which the document, thing or communication is responsive.

3. If you object to any part of an Interrogatory, state your objection and respond to the remaining portion of the Interrogatory.

### **INTERROGATORIES**

#### **INTERROGATORY NO. 1:**

For each attorney, agent, officer, or employee of any of the Co-Defendants who provided assistance, comments, suggestions, materials or funding, or who communicated with CMI, in connection with the preparation of the *inter partes* review petition in IPR2013-00038, provide (i) the name of such attorney, agent, officer, or employee of the Co-Defendant, (ii) the name of such Co-Defendant, (iii) a description of the assistance, comments, suggestions, materials or funding provided, or of such communication, and (iv) the date on which the assistance,

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