

DOCKET NO: 403589US91IPR

**IN THE UNITED STATES PATENT & TRADEMARK OFFICE  
BEFORE THE PATENT TRIAL AND APPEAL BOARD**

*IN RE* U.S. PATENT NO. 7,956,978

TRIAL NO: IPR2013-00038

FILED : JULY 1, 2008

ISSUED: JUNE 7, 2011

INVENTORS : HONGYONG ZHANG

ASSIGNEE: SEMICONDUCTOR ENERGY  
LABORATORY CO., LTD.

TITLE: LIQUID-CRYSTAL DISPLAY  
DEVICE HAVING A  
PARTICULAR CONDUCTIVE  
LAYER

**REQUEST FOR *INTER PARTES* REVIEW OF U.S. PATENT NO. 7,956,978  
UNDER 35 U.S.C. §§ 311-319 AND 37 C.F.R. § 42.100 ET SEQ.**

Mail Stop PATENT BOARD, PTAB  
Commissioner for Patents  
P.O. Box 1450  
Alexandria, Virginia 22313-1450

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**EXHIBIT LIST**

1001. U.S. Patent No. 7,956,978 to Zhang et al.
1002. Prosecution history of application 12/165,783, which matured into the '978 patent.
1003. U.S. Patent No. 5,513,028 to Sono et al.
1004. U.S. Patent No. 5,504,601 to Watanabe et al.
1005. Declaration of Miltiadis Hatalis, Ph.D.

Petitioner Chimei Innolux Corp. (“CMI” or “Petitioner”) respectfully requests *inter partes* review for claims 7 and 17 U.S. Patent No. 7,956,978 (the “’978 patent,” attached as Ex. 1001) in accordance with 35 U.S.C. §§ 311–319 and 37 C.F.R. § 42.100 et seq.

## **I. MANDATORY NOTICES**

Pursuant to 37 C.F.R. § 42.8(a)(1), CMI provides the following mandatory disclosures.

### **A. Real Party-In-Interest**

Pursuant to 37 C.F.R. § 42.8(b)(1), Petitioner certifies that CMI is the real party-in-interest.

### **B. Related Matters**

Pursuant to 37 C.F.R. § 42.8(b)(2), Petitioner states that the ‘978 patent is involved in the litigation styled *Semiconductor Energy Laboratory Co., Ltd. v. Chimei Innolux Corp., et al.*, SACV12-0021-JST (C.D. Cal.), filed on January 5, 2012. This litigation remains pending. The patents-in-suit are U.S. Patents 7,876,413; 6,404,480; 7,697,102; 7,956,978; 8,068,204; and 7,923,311.

This IPR petition is directed to U.S. Patent 7,956,978, however, petitions corresponding to the remaining patents are forthcoming<sup>1</sup>. To this end the Patent Trial & Appeal Board (PTAB) may wish to consider consolidating the six (6)

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<sup>1</sup> An IPR petition directed to U.S. Patent 6,404,480 was filed on October 19, 2012.

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