

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

---

In re U.S. Patent No. 7,876,413

Filed: Oct. 16, 2008

Issued: Jan. 25, 2011

Inventors: Yoshiharu Hirakata  
Shunpei Yamazaki

Assignee: Semiconductor Energy Laboratory Co., Ltd.

Title: Electronic Apparatus with a Flexible Printed Circuit and a  
Transparent Conductive Layer

---

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

**PETITION FOR *INTER PARTES* REVIEW OF U.S. PATENT NO. 7,876,413  
UNDER 35 U.S.C. §§ 311-319 AND 37 C.F.R. § 42.100 ET SEQ.**

**TABLE OF CONTENTS**

**TABLE OF CONTENTS ..... i**

**EXHIBIT LIST ..... iii**

**I. MANDATORY NOTICES .....1**

**A. Real Party-In-Interest.....1**

**B. Related Matters .....1**

**C. Lead And Back-Up Counsel.....5**

**D. Service Information.....6**

**II. PAYMENT OF FEES .....6**

**III. REQUIREMENTS FOR *INTER PARTES* REVIEW.....6**

**A. Grounds For Standing .....6**

**B. Identification of Challenge .....7**

**1. Claims for which *inter partes* review is requested .....7**

**2. The specific art and statutory ground(s) of the challenge .....7**

**3. How the challenged claims are to be construed.....8**

**4. How the construed claims are unpatentable under the statutory  
        grounds identified in 37 C.F.R. § 42.204(b)(2).....8**

**5. Supporting evidence relied upon to support the challenge.....9**

**IV. SUMMARY OF THE ‘413 PATENT .....9**

**A. Description Of The Alleged Invention .....9**

|   |           |
|---|-----------|
| <b>B. Summary Of The Prosecution History.....</b>   | <b>11</b> |
| <b>V. THERE IS A REASONABLE LIKELIHOOD THAT AT LEAST ONE CLAIM OF THE ‘413 PATENT IS UNPATENTABLE .....</b>   | <b>13</b> |
| <b>A. Identification Of The References As Prior Art .....</b>   | <b>13</b> |
| <b>B. Summary Of Grounds for Unpatentability .....</b>  | <b>14</b> |
| <b>1. Applicant’s Admitted Prior art in view of Sukegawa renders claims 1, 2, 4-7, 9-11, 13-18, 20-22, 24, 25, and 27-29 of the ‘413 patent obvious</b> |           |
| <b>15</b>   |           |
| <b>2. Sukegawa in view of Nakamoto renders claims 1, 2, 4-7, 9-11, 13-18, 20-22, 24, 25, and 27-29 of the ‘413 patent obvious.....</b>                  | <b>16</b> |
| <b>VI. DETAILED EXPLANATION.....</b>  | <b>16</b> |
| <b>VII. CONCLUSION .....</b>  | <b>54</b> |
| <b>CERTIFICATE OF SERVICE .....</b>   | <b>56</b> |

**EXHIBIT LIST**

1001. U.S. Patent No. 7,876,413 to Hirakata et al.
1002. Prosecution history of application 12/252,793, which matured into the  
‘413 patent.
1003. U.S. Patent No. 5,636,329 to Sukegawa et al.
1004. Japanese Patent Publication No. H08-160446 to Nakamoto et al.  
(including English translation)
1005. Declaration of Miltiadis Hatalis, Ph.D.

Petitioner Chimei Innolux Corp. (“CMI” or “Petitioner”) respectfully requests *inter partes* review for claims 1, 2, 4-7, 9-11, 13-18, 20-22, 24, 25, and 27-29 of U.S. Patent No. 7,876,413 (the “‘413 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 ‘413 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 7,876,413, however, petitions corresponding to the remaining patents have been filed previously, one remaining petition is forthcoming. To this end, the Patent Trial & Appeal Board (PTAB) may wish to consider consolidating the six (6) patents to a single panel of

Administrative Patent Judges for administrative efficiency. Likewise, the PTAB is

# Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

## Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

## Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

## Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

## API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

## LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

## FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

## E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.