Filed on behalf of Innovative Display Technologies, LLC
By: Justin B. Kimble (jkimble@bcpc-law.com)
      Jeffrey R. Bragalone (jbragalone@bcpc-law.com)
      Bragalone Conroy PC
      2200 Ross Ave.
      Suite 4500 – West
      Dallas, TX 75201
      Tel: 214.785.6670
      Fax: 214.786.6680

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

LG DISPLAY CO., LTD.,
Petitioner,
v.
INNOVATIVE DISPLAY TECHNOLOGIES, LLC
Patent Owner

Case IPR2014-01096
U.S. Patent No. 7,537,370

EXHIBIT 2005: DECLARATION OF MR. KENNETH WERNER

Mail Stop PATENT BOARD
Patent Trial and Appeal Board
U.S. Patent & Trademark Office
P.O. Box 1450

Petition for Inter Partes Review of U.S. Patent No. 7,537,370

Declaration of Mr. Kenneth Werner

I, Kenneth Werner, do hereby declare and state, that all statements made herein of my own knowledge are true and that all statements made on information and belief are believed to be true; and further that these statements were made with the knowledge that willful false statements and the like so made are punishable by fine or imprisonment, or both, under Section 1001 of Title 18 of the United States Code.

Executed April 6, 2015, in Norwalk, Connecticut, United States of America.

_____

Mr. Kenneth Werner

Table of Contents

I. INTRODUCTION

1.   The facts set forth below are known to me personally and I have firsthand knowledge of them. I am a U.S. citizen over eighteen years of age. I am fully competent to testify as to the matters addressed in this Declaration. I understand that this Declaration is being submitted along with Patent Owner's response to the Decision entered January 13, 2015 on Institution of Inter Partes Review by the Patent Trial and Appeal Board ("PTAB") for US Patent No. 7,537,370 (hereinafter, "the '370 Patent") in IPR2014-01096.

A. Engagement

2.   I have been retained as a technical expert by Patent Owner to study and provide my opinions on the technology claimed in, and the patentability or nonpatentability of claims 15 and 27 of the '370 patent on the grounds that the Board has instituted.

B. Background and Qualifications

3.   I have summarized in this section my educational background, work experience, and other relevant qualifications. A true and accurate copy of my curriculum vitae is attached as Appendix A. Appendix A also includes a list of all other cases in which I testified as an expert at trial or by deposition.

4.   I have over twenty-seven years of experience in the electronic display industry. I am currently founder and Principal of Nutmeg Consultants. In my current role I regularly address technical and trade organizations in the Americas

and Asia, and am routinely consulted by financial advisors, analysts, attorneys, members of the international press corps, and by companies entering or repositioning themselves in the industry, or wishing consulting services on display technology, the display industry, or display sourcing. I speak frequently with senior executives of large, mid-sized, and small display-related companies in Asia, Europe, and the Americas, as well as government officials and academic researchers. At BRDisplay II (July 2004, Recife, Brazil), I served as a consultant to the working groups developing a national strategy for the growth of display-related industry in Brazil and wrote the introduction to their report.

5.   I also currently serve as Marketing Director for Tannas Electronic Displays (Orange, California) and Senior Analyst for MEKO, Ltd. As Marketing Director for Tannas Electronic Displays, I have done extensive research on markets for custom-sized and bar-type displays, particularly for signage applications. I am a founding co-editor of MEKO's Display Daily, and a regular contributor to HDTVexpert.com.

6.   I began my career as a semiconductor device design engineer for RCA. I hold a B.A. in physics from Rutgers University and an M.S. in solid-state physics from the University of North Carolina at Chapel Hill. And I have taken graduate management courses at the University of Connecticut.

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