IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

INNOVATIVE DISPLAY TECHNOLOGIES LLC,	§	
	§	
Plaintiff,	§	**C.A. No. 2:13-cv-522**
	§	**(Consolidated – Lead Case)**
v.	§	
	§	**JURY TRIAL DEMANDED**
ACER INC. AND ACER AMERICA CORP.,	§	
	§	
Defendants.	§	

PLAINTIFF'S OPENING CLAIM CONSTRUCTION BRIEF

Plaintiff Innovative Display Technologies LLC ("Plaintiff" or "IDT") hereby files its opening claim construction brief pursuant to the Court's Docket Control Order, Dkt. No. 37.

TABLE OF CONTENTS

TABLE OF AUTHORITIES

Cases

Statute and Rules

I. PATENTS-IN-SUIT

IDT asserts seven United States patents in this lawsuit: (1) 6,755,547 ("the '547 patent"); (2) 7,300,194 ("the '194 patent"); 7,404,660 ("the '660 patent"); (4) 7,384,177 ("the '177 patent"); (5) 7,434,974 ("the '974 patent"); 7,537,370 ("the '370 patent"); and 8,215,816 ("the '816 patent") (collectively, the "patents-in-suit"). The seven patents-in-suit all share a common parent patent and have virtually the same written descriptions, with only minor variations between them. The patents-in-suit also share the same inventor, Jeffery R. Parker. Generally, the patents-in-suit relate to the field of backlights, which can be used to illuminate liquid crystal displays, known as LCDs.

II. TECHNOLOGY OVERVIEW

Many consumer products today, such as televisions, laptops, smart phones, and tablets, use LCDs to display images and video. The liquid crystals inside an LCD are its operative parts. Liquid crystals themselves do not emit light. Therefore, for an LCD to produce an image that we can see, the LCD requires a separate light source. Typical LCDs use a backlight for that light source. A backlight sits behind the LCD and shines light through the LCD toward the viewer. A basic backlight for an LCD consists of several parts: a panel (sometimes called a light guide or optical conductor), an LED strip (light sources), a tray, and films, as seen in the simplified graphic at Illustration 1 below.

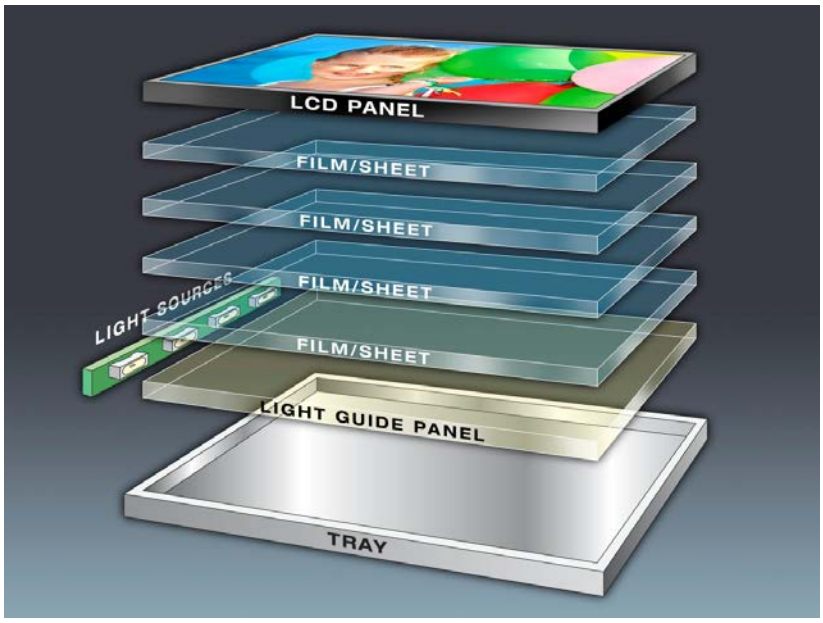

Illustration 1

In the accused products, the panel of a backlight receives light from a strip of light emitting diodes ("LEDs") on its edge(s). A backlight's panel uses an arrangement of deformities improve the efficiency, uniformity, and the visual appearance of light it emits. When light hits one of the deformities on the panel, it is either emitted from the panel at that point or it is reflected to the opposite side of the panel and emitted on that side.

DOCKET ALARM

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.