

UNITED STATES PATENT AND TRADEMARK OFFICE

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**BEFORE THE PATENT TRIAL AND APPEAL BOARD**

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LG DISPLAY CO., LTD.  
Petitioner

v.

INNOVATIVE DISPLAY TECHNOLOGIES LLC  
Patent Owner

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**Case: IPR2014-01097**

**Patent 7,300,194**

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**PETITIONER'S REPLY IN SUPPORT OF ITS PETITION  
FOR *INTER PARTES* REVIEW OF U.S. PATENT NO. 7,300,194**

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**PETITIONER'S EXHIBIT LIST**

<b>Description</b>	<b>Exhibit #</b>
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J. A. Castellano, <i>Handbook of Display Technology</i> , Academic Press Inc., San Diego, 1992, at pp. 9-13 and Ch. 8	1015
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In its January 13, 2015 Institution Decision on the '194 Patent, the Board correctly found that Petitioner LG Display is likely to prevail in showing that (a) claims 1, 4-6, and 28 are obvious over Pristash; (b) claims 1, 16, 22, 23, 27, and 31 are anticipated by Funamoto; (c) claims 4, 5, and 6 are obvious over Funamoto; (d) claim 28 is anticipated by Kobayashi; and (e) claims 1, 4-6, and 28 are anticipated by Nishio. *See* Decision, Paper 9, at 17. Patent Owner Innovative Display Technologies, LLC's Response does not rebut the Petition or the Board's Decision. *See* Response, Paper 19. Additionally, Patent Owner's Response is nearly identical to the declaration of its expert, Mr. Werner, who offers no technical opinions but rather challenges the sufficiency of the disclosure in the Petition. Thus, as explained below, it should be given no weight.

**I. MR. WERNER'S DECLARATION SHOULD BE GIVEN LITTLE TO NO WEIGHT**

Mr. Werner's declaration should be given little to no weight for at least two reasons. First, the patent and prior art analysis sections of Mr. Werner's declaration are nearly identical to those sections of the Patent Owner Response. *Compare* Paper No. 19, at 8-25 *with* Ex. 2006, at ¶¶40-78; *see also* Ex. 1026. Indeed, Mr. Werner admitted during his deposition that the Patent Owner Response was identical to his declaration except for the addition of citations to his declaration in the Response. *See* Ex.1027, at 22:23-26:21. Because Mr. Werner's declaration simply tracks the arguments in the Response and is nearly identical, his declaration

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