

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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SONY CORPORATION OF AMERICA  
Petitioner

Patent No. 7,612,843  
Issue Date: Nov. 3, 2009  
Title: STRUCTURE AND DRIVE SCHEME FOR LIGHT EMITTING DEVICE  
MATRIX AS DISPLAY LIGHT SOURCE

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**PETITION FOR *INTER PARTES* REVIEW**

**OF U.S. PATENT NO. 7,612,843**

No. IPR2014-01268

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## List of Exhibits

Ex. No.	Exhibit Name
Sony-1001	U.S. Patent No. 7,612,843 (“the ’843 Patent”)
Sony-1002	Public PAIR Transaction History for U.S. Pat. Appl. No. 11/754,268
Sony-1003	U.S. Provisional Appl. No. 60/767,534 (“the ’534 Provisional Application”)
Sony-1004	Expert Declaration of Richard A. Flasck (“Flasck Decl.”)
Sony-1005	Curriculum Vitae of Richard A. Flasck
Sony-1006	U.S. Pat. Appl. Pub. No. 2010/0020002 to Van Woudenberg <i>et al.</i> (“Van Woudenberg”)
Sony-1007	U.S. Pat. Appl. Pub. No. 2003/0058229 to Kawabe <i>et al.</i> (“Kawabe”)
Sony-1008	U.S. Pat. Appl. Pub. No. 2005/0073495 to Harbers <i>et al.</i> (“Harbers”)
Sony-1009	International Pub. No. WO 2006-070323 to Van Woudenberg

## **I. Mandatory Notices (37 C.F.R. § 42.8)**

Real Party-in-Interest: Sony Corporation of America (“Sony” or “Petitioner”).

Related Matter: *Dr. Chen-Jean Chou v. Sony Corporation, Sony Corporation of America, and Sony Electronics Inc.*, 13-cv-01661 (S.D. Cal.) (“the related District Court action”).

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## **II. Grounds for Standing (37 C.F.R. § 42.104(a))**

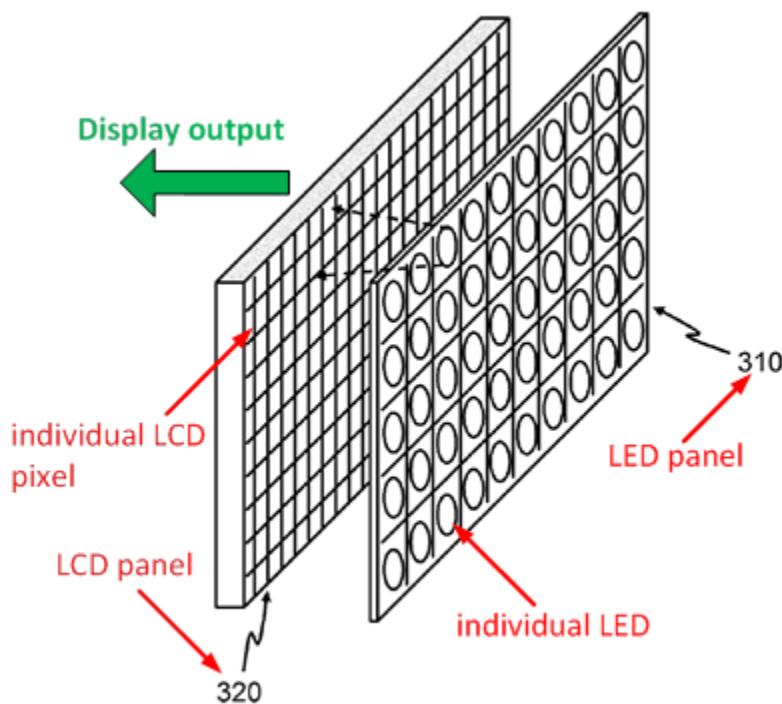
Petitioner certifies that the patent for which review is sought, U.S. Patent No. 7,612,843 (“the ’843 Patent,” Sony-1001), is available for *inter partes* review and that Petitioner is not estopped from requesting an *inter partes* review challenging the patent claims on the grounds identified in this Petition. Petitioner submits that, pursuant to 35 U.S.C. § 315(b), it is not barred from filing this Petition because Petitioner (including any privies) was not served with a complaint asserting infringement of the ’843 Patent more than one year prior to the filing of this Petition.

### III. Identification of Challenge (37 C.F.R. § 42.104(b)(1)-(3)) and Relief Requested (37 C.F.R. § 42.22(a)(1))

Petitioner challenges claims 14, 18-20, and 25-26 of the '843 Patent under 35 U.S.C. §§ 102 and 103, and cancellation of those claims is requested.

#### A. Background of the '843 Patent

The '843 Patent is directed to a display system that uses a matrix of light emitting diodes (LEDs) and a matrix of light valves, such as liquid crystal display (LCD) pixels. *See* Sony-1001 2:15-18; 3:3-10; 5:16-18. The basic configuration of the LEDs and the LCD pixels is shown in the below figure from the '843 Patent. *See id.* 5:4-20



Sony-1001 Fig. 3 (annotated)

As shown, the LCD panel is placed in alignment with the LED panel. The LEDs emit light that is provided to the LCD pixels. The LCD pixels regulate the amount of

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