UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

LG DISPLAY CO., LTD. LG ELECTRONICS, INC. Petitioners

V.

INNOVATIVE DISPLAY TECHNOLOGIES LLC Patent Owner

Case: IPR2014-01362

Patent 7,384,177

PETITIONERS' CONSOLIDATED REPLY IN SUPPORT OF THE PETITION FOR *INTER PARTES* REVIEW OF U.S. PATENT NO. 7,384,177



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1.		WERNER'S DECLARATION SHOULD BE GIVEN NO GHT1
II.	CLA	IMS 1–3, 5–7, 9, 10, 13–15, 19, 21, 23–25, AND 27 ARE OBVIOUS
	OVE	R MELBY4
	A.	Melby Discloses "at least one sheet, film or substrate overlying the
		assembly for controlling the light emitted from the assembly to fit a
		particular application" (claim 1)
	B.	Melby Discloses "a tray having a back wall and continuous side walls
		that form a hollow cavity or recess completely surrounded by the side
		walls" (claim 1)
	C.	Melby Discloses "a portion of the light emitted from the light sources
		mixes in the cavity or recess" (claim 9)
	D.	Melby Discloses "the at least one sheet, film or substrate has
		deformities for controlling the light output ray angle distribution to fit
		a particular application." (claim 14)
	E.	Melby Discloses "hollow cavity or recess completely surrounded by
		the side walls" (claim 15)11
	F.	Melby Discloses "at least one sheet, film or substrate overlying the
		assembly for controlling the light emitted from the assembly to fit a
		particular application" (claim 15)
	G.	Melby Discloses "wherein there is at least one sheet, film or substrate
	G.	that has deformities on at least one surface to control the light output
		ray angle distribution to fit a particular application" (claim 23)12
III.	CIA	IMS 1, 2, 6, 7, 9, 10, 13–15, 19, 21, 23, 24, AND 26 ARE
111.		ICIPATED BY NAKAMURA13, 13, 21, 23, 24, AND 20 ARE
	Α.	Nakamura Discloses "a tray having continuous side walls" (claim
		1)
	B.	Nakamura Discloses "a tray having a back wall" (claim 1)
	C.	Nakamura Discloses "the at least one sheet, film or substrate has
	C.	deformities for controlling the light output ray angle distribution to fi
		a particular application." (claim 14)
	D.	Nakamura Discloses "a tray having continuous side walls" (claim
	Ъ.	15)
	E.	Nakamura Discloses "a tray having a back wall" (claim 15) 19
	F.	Nakamura Discloses "wherein there is at least one sheet, film of
	1.	substrate that has deformities on at least one surface to control the
		substrate that has deformitted on at least one surface to control the



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	light output ray angle distribution to fit a particular	application"
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PETITIONERS' EXHIBIT LIST

Description	Exhibit #	
U.S. Patent No. 7,384,177		
Prosecution History of U.S. Patent No. 7,384,177		
Complaints filed in Related District Court Cases	1003	
Declaration of Michael J. Escuti, Ph.D. ("Escuti Decl.")	1004	
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