

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

IPR2014-01362

U.S. Patent No. 7,384,177

**PETITIONERS' OBJECTIONS TO PATENT OWNER'S
DEMONSTRATIVES**

Pursuant to Paper No. 28, Petitioners¹ object to Patent Owner's Oral Argument Demonstratives, emailed to the Board on November 13, 2015. Pursuant to the Board's Order: "The objections should identify with particularity which demonstratives are subject to objection, and include a short (one sentence or less) statement of the reason for each objection. No argument or further explanation is permitted." Petitioners identify below which demonstratives are subject to objection, and include a short statement of the reason for each objection. In identifying the demonstratives, Petitioner refers to the slide number in the lower right corner of Patent Owner's slides.

Demonstrative Slide 4: New argument not found in any paper and unsupported characterization of the evidence with respect to Petitioners' arguments.

Demonstrative Slide 8: New argument not found in any paper and unsupported characterization of the evidence with respect to Mr. Werner's testimony.

Demonstrative Slide 9: New argument not found in any paper and unsupported characterization of the evidence with respect to Mr. Werner's testimony.

Demonstrative Slide 10: New argument not found in any paper and unsupported

¹ The Board consolidated IPR2015-00489 with this proceeding. *See* Paper 22 (July 13, 2015).

characterization of the evidence with respect to the Petition and Dr. Escuti's testimony.

Demonstrative Slide 11: New argument not found in any paper and unsupported characterization of the evidence with respect to Mr. Werner's testimony.

Demonstrative Slide 12: New argument not found in any paper and unsupported characterization of the evidence with respect to Mr. Werner's testimony.

Demonstrative Slide 14: New argument not found in any paper and unsupported characterization of the evidence with respect to Petitioner's arguments.

Demonstrative Slide 17: New argument not found in any paper and unsupported characterization of the evidence with respect to Petitioner's arguments.

Demonstrative Slide 18: New argument not found in any paper and unsupported characterization of the evidence with respect to Petitioner's arguments.

Demonstrative Slide 19: New argument not found in any paper with respect to the characterization of cited case law and unsupported characterization of evidence.

Demonstrative Slide 20: New argument not found in any paper and unsupported characterization of the evidence with respect to Dr. Escuti's testimony and irrelevant with respect to the instituted grounds at issue in this proceeding.

IPR2014-01362

U.S. Patent No. 7,384,177

Dated: November 18, 2015

Respectfully submitted,

/Robert G Pluta Reg No 50970/

Robert G. Pluta

Registration No. 50,970

Amanda K. Streff

Registration No. 65,224

MAYER BROWN LLP

71 S. Wacker Drive

Chicago, IL 60606

Telephone: 312-701-8641

Facsimile: 312-701-7711

rpluta@mayerbrown.com

astreff@mayerbrown.com

Jamie B. Beaber

Baldine B. Paul

Registration No. 54,369

Anita Y. Lam

Registration No. 67,394

MAYER BROWN LLP

1999 K Street, N.W.

Washington, DC 20006

Telephone: 202-263-3000

Facsimile: 202-263-3300

jbeaber@mayerbrown.com

bpaul@mayerbrown.com

alam@mayerbrown.com

*Counsel for LG Display Co. Ltd. and LG
Electronics, Inc.*

CERTIFICATE OF SERVICE

I hereby certify that on this 18th day of November, 2015, a copy of the attached PETITIONERS' OBJECTIONS TO PATENT OWNER'S DEMONSTRATIVES, was served by e-mail pursuant to Patent Owner's consent in its Mandatory Notices Pursuant to 37 C.F.R. §§ 42.8(a)(2) and 42.8(b): jkimble@bcpc-law.com, jbragalone@bcpc-law.com, tsaad@bpcp-law.com, nkliwer@bpcp-law.com, and bkennedy@bpcp-law.com.

Dated: November 18, 2015

Respectfully submitted,

/Robert G Pluta Reg No 50970/

Robert G. Pluta

Registration No. 50,970

Mayer Brown LLP

71 S. Wacker Drive

Chicago, IL 60606

Telephone: 312-701-8641

Facsimile: 312-701-7711

Counsel for LG Display Co., Ltd.