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**INNOVATIVE DISPLAY TECHNOLOGIES LLC's  
EXHIBIT 2007**

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UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE PATENT TRIAL AND APPEAL BOARD

LG DISPLAY CO., LTD.  
Petitioner

v.

INNOVATIVE DISPLAY TECHNOLOGIES LLC  
Patent Owner

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Case IPR2014-01362  
U.S. Patent No. 7,384,177



### **JURISDICTION AND VENUE**

3. This action arises under the Patent Laws of the United States, 35 U.S.C. § 1, *et seq.*, including 35 U.S.C. §§ 271, 281, 283, 284, and 285. This Court has subject matter jurisdiction over this case for patent infringement under 28 U.S.C. §§ 1331 and 1338(a).

4. As further detailed herein, this Court has personal jurisdiction over HP. HP is amenable to service of summons for this action. Furthermore, personal jurisdiction over HP in this action comports with due process. HP maintains an office in this District at 5400 Legacy Drive, Plano, TX 75024. HP has conducted and regularly conducts business within the United States and this District. HP has purposefully availed itself of the privileges of conducting business in the United States, and more specifically in Texas and this District. HP has sought protection and benefit from the laws of the State of Texas by maintaining an office in this District and by placing infringing products into the stream of commerce through an established distribution channel with the awareness and/or intent that they will be purchased by consumers in this District.

5. HP – directly or through intermediaries (including distributors, retailers, and others), subsidiaries, alter egos, and/or agents – ships, distributes, offers for sale, and/or sells its products in the United States and this District. HP has purposefully and voluntarily placed one or more of its infringing products, as described below, into the stream of commerce with the awareness and/or intent that they will be purchased by consumers in this District. Defendant knowingly and purposefully ships infringing products into this District through an established distribution channel. These infringing products have been and continue to be purchased by consumers in this District. Upon information and belief, through those activities, HP has committed the tort of patent infringement in this District and/or has induced others to commit patent infringement in this District. Plaintiff's cause of action for patent infringement arises directly from HP's activities in this District.

6. Venue is proper in this Court according to the venue provisions set forth by 28 U.S.C. §§ 1391(b)-(d) and 1400(b). HP is subject to personal jurisdiction in this District, and therefore is deemed to reside in this District for purposes of venue. Upon information and belief, Defendant has committed acts within this judicial District giving rise to this action and does business in this District, including but not limited to making sales in this District, providing service and support to their respective customers in this District, and/or operating an interactive website, available to persons in this District, that advertises, markets, and/or offers for sale infringing products.

### **BACKGROUND**

#### **A. The Patents-In-Suit.**

7. U.S. Patent No. 6,755,547 titled “Light Emitting Panel Assemblies” (“the ’547 patent”) was duly and legally issued by the U.S. Patent and Trademark Office on June 29, 2004, after full and fair examination. Jeffery R. Parker is the sole inventor listed on the ’547 patent. The ’547 patent has been assigned to Plaintiff, and Plaintiff holds all rights, title, and interest in the ’547 patent, including the right to collect and receive damages for past, present and future infringements. A true and correct copy of the ’547 patent is attached as **Exhibit A** and made a part hereof.

8. U.S. Patent No. 7,300,194 titled “Light Emitting Panel Assemblies” (“the ’194 patent”) was duly and legally issued by the U.S. Patent and Trademark Office on November 27, 2007, after full and fair examination. Jeffery R. Parker is the sole inventor listed on the ’194 patent. The ’194 patent has been assigned to Plaintiff, and Plaintiff holds all rights, title, and interest in the ’194 patent, including the right to collect and receive damages for past, present and future infringements. A true and correct copy of the ’194 patent is attached as **Exhibit B** and made a part hereof.

9. U.S. Patent No. 7,384,177 titled “Light Emitting Panel Assemblies” (“the ’177 patent”) was duly and legally issued by the U.S. Patent and Trademark Office on June 10, 2008, after full and fair examination. Jeffery R. Parker is the sole inventor listed on the ’177 patent. The ’177 patent has been assigned to Plaintiff, and Plaintiff holds all rights, title, and interest in the ’177 patent, including the right to collect and receive damages for past, present and future infringements. A true and correct copy of the ’177 patent is attached as **Exhibit C** and made a part hereof.

10. U.S. Patent No. 7,404,660 titled “Light Emitting Panel Assemblies” (“the ’660 patent”) was duly and legally issued by the U.S. Patent and Trademark Office on July 29, 2008, after full and fair examination. Jeffery R. Parker is the sole inventor listed on the ’660 patent. The ’660 patent has been assigned to Plaintiff, and Plaintiff holds all rights, title, and interest in the ’660 patent, including the right to collect and receive damages for past, present and future infringements. A true and correct copy of the ’660 patent is attached as **Exhibit D** and made a part hereof.

11. U.S. Patent No. 7,434,974 titled “Light Emitting Panel Assemblies” (“the ’974 patent”) was duly and legally issued by the U.S. Patent and Trademark Office on October 14, 2008, after full and fair examination. Jeffery R. Parker is the sole inventor listed on the ’974 patent. The ’974 patent has been assigned to Plaintiff, and Plaintiff holds all rights, title, and interest in the ’974 patent, including the right to collect and receive damages for past, present and future infringements. A true and correct copy of the ’974 patent is attached as **Exhibit E** and made a part hereof.

12. U.S. Patent No. 7,537,370 titled “Light Emitting Panel Assemblies” (“the ’370 patent”) was duly and legally issued by the U.S. Patent and Trademark Office on May 26, 2009,

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