

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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MERCEDES-BENZ USA, LLC and  
MERCEDES-BENZ U.S. INTERNATIONAL, INC.,  
*Petitioner,*

v.

INNOVATIVE DISPLAY TECHNOLOGIES LLC,  
*Patent Owner.*

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*Inter Partes* Review of U.S. Patent No. 7,300,194  
Issue Date: November 27, 2007  
Patent Title: Light Emitting Panel Assemblies  
IPR Case No.: *To Be Assigned*

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PETITION FOR *INTER PARTES* REVIEW OF CLAIMS 1, 4-6, 16, 22, 23, 27, 28,  
AND 31 OF U.S. PATENT NO. 7,300,194

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**PETITIONER'S EXHIBIT LIST**

<b>Description</b>	<b>Exhibit #</b>
U.S. Patent No. 7,300,194	1001
Prosecution History of U.S. Patent No. 7,300,194	1002
Complaints filed in Related District Court Cases	1003
Declaration of Michael J. Escuti, Ph.D. ("Escuti Decl.")	1004
U.S. Patent No. 5,461,547 ("Ciupke")	1005
U.S. Patent No. 5,005,108 ("Pristash")	1006
U.S. Patent No. 5,619,351 ("Funamoto")	1007
JP H06-273756 ("Gyoko") (English)	1008
JP H06-273756 ("Gyoko") (Japanese)	1009
JP H06-273756 ("Gyoko") (Certification)	1010
U.S. Patent No. 5,408,388 ("Kobayashi")	1011
U.S. Patent No. 5,598,280 ("Nishio")	1012
U.S. Patent No. 6,108,060 ("the '060 Patent") and corresponding file history	1013
U.S. Patent No. 5,160,195 ("Miller")	1014
J. A. Castellano, <i>Handbook of Display Technology</i> , Academic Press Inc., San Diego, 1992, at pp. 9-13 and Ch. 8	1015
U.S. Patent No. 5,384,658 ("Ohtake")	1016
U.S. Patent No. 5,303,322 ("Winston")	1017
U.S. Patent No. 5,050,946 ("Hathaway")	1018
EP500960 ("Ohe")	1019
U.S. Patent No. 5,828,488 ("Ouderkirk")	1020
3M product brochure 75-0500-0403-7, "Brightness Enhancement Film (BEF)", 2 pages (1993)	1021
U.S. Patent No. 5,706,134 ("Konno")	1022
U.S. Patent No. 5,944,405 ("Takeuchi")	1023
U.S. Patent No. 5,381,309 ("Borchardt")	1024

Pursuant to 35 U.S.C. §311, Petitioner hereby respectfully requests *inter partes* review of Claims 1, 4-6, 16, 22, 23, 27, 28, and 31 of Ex. 1001, U.S. Patent No. 7,300,194 (“the ‘194 Patent”) (“Ex. 1001”) which issued on November 27, 2007. The challenged claims are unpatentable under 35 U.S.C. §§102 and 103 over the prior art publications identified and applied in this Petition.

## I. MANDATORY NOTICES

Pursuant to 37 C.F.R. §42.8, Petitioner provides the following mandatory disclosures:

A. Real Parties-In-Interest. Mercedes-Benz USA, LLC, a Delaware limited liability company with its principal place of business at 1 Mercedes Drive, Montvale, New Jersey 07465, and Mercedes-Benz U.S. International, Inc., an Alabama corporation with its principal place of business at 1 Mercedes Drive, Vance, Alabama 35490, are real parties-in-interest.

B. Related Matters. Pursuant to 37 C.F.R. §42.8(b)(2), Petitioner submits that the ‘194 Patent is the subject of a patent infringement lawsuit brought by the Patent Owner, Innovative Display Technologies LLC (*see* Ex. 1003), against Petitioner in the United States District Court for the Eastern District of Texas: *Innovative Display Technologies LLC v. Mercedes-Benz U.S. International, Inc. and Mercedes-Benz USA, LLC* Case No. 2:14-cv-535. In addition, the ‘194 Patent is the subject of another IPR, IPR2014-01097. The ‘194 Patent is also asserted in at least the actions listed in the

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