

UNITED STATES PATENT AND TRADEMARK OFFICE

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**BEFORE THE PATENT TRIAL AND APPEAL BOARD**

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LG ELECTRONICS, INC.  
Petitioner

v.

INNOVATIVE DISPLAY TECHNOLOGIES LLC  
Patent Owner

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**Case: IPR2015-00493**

**Patent 7,537,370**

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**PETITION FOR *INTER PARTES* REVIEW  
OF U.S. PATENT NO. 7,537,370**

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Petition for *Inter Partes* Review

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**PETITIONER'S EXHIBIT LIST**

<b>Description</b>	<b>Exhibit #</b>
U.S. Patent No. 7,537,370	1001
Prosecution History of U.S. Patent No. 7,537,370	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
EP500960 ("Ohe")	1007
U.S. Patent No. 5,408,388 ("Kobayashi")	1008
U.S. Patent No. 5,160,195 ("Miller")	1009
J. A. Castellano, <i>Handbook of Display Technology</i> , Academic Press Inc., San Diego, 1992, at pp. 9-13 and Ch. 8	1010
U.S. Patent No. 5,598,280 ("Nishio")	1011
U.S. Patent No. 5,384,658 ("Ohtake")	1012
U.S. Patent No. 5,303,322 ("Winston")	1013
U.S. Patent No. 5,050,946 ("Hathaway")	1014
U.S. Patent No. 5,828,488 ("Ouderkirk")	1015
3M product brochure 75-0500-0403-7, "Brightness Enhancement Film (BEF)," 2 pages (1993)	1016
U.S. Patent No. 5,706,134 ("Konno")	1017
U.S. Patent No. 5,944,405 ("Takeuchi")	1018

Pursuant to 35 U.S.C. §311, Petitioner hereby respectfully requests *inter partes* review of Claims 1, 4, 8, 13, 15, 27, 29, and 47 of Ex. 1001, U.S. Patent No. 7,537,370 (“the ’370 Patent”) which issued on May 26, 2009. 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. LG Electronics U.S.A., Inc. is a real party-in-interest with Petitioner, LG Electronics, Inc.

B. Related Matters. Pursuant to 37 C.F.R. §42.8(b)(2), Petitioner submits that the ’370 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 District of Delaware: *Delaware Display Group LLC and Innovative Display Technologies LLC v. LG Electronics, Inc., LG Electronics U.S.A., Inc., LG Display Co., Ltd., and LG Display America, Inc.*, Case No. 1:13-cv-02109. The ’370 Patent is also asserted in at least the actions listed in the chart below.

Description	Docket Number
<i>IDT v. AT&amp;T Inc., et. al.</i>	2:14-cv-00720, EDTX
<i>IDT v. BMW of North America, LLC, et. al.</i>	2:14-cv-00106, EDTX
<i>IDT v. Dell Inc.</i>	2:13-cv-00523, EDTX

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