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### UNITED STATES PATENT AND TRADEMARK OFFICE

### BEFORE THE PATENT TRIAL AND APPEAL BOARD

LG DISPLAY CO., LTD., Petitioner,

V.

## DELAWARE DISPLAY GROUP LLC, Patent Owner.

Case IPR2015-00506 U.S. Patent No. 7,434,973

### **DECLARATION OF KENNETH WERNER – EXHIBIT 2010**

Mail Stop PATENT BOARD Patent Trial and Appeal Board U.S. Patent & Trademark Office P.O. Box 1450



## Petition for *Inter Partes* Review of U.S. Patent No. 7,434,973 Declaration of Mr. Kenneth Werner

I, Kenneth Werner, do hereby declare and state, that all statements made herein of my own knowledge are true and that all statements made on information and belief are believed to be true; and further that these statements were made with the knowledge that willful false statements and the like so made are punishable by fine or imprisonment, or both, under Section 1001 of Title 18 of the United States Code.

Executed October 2, 2015, in Norwalk, Connecticut, United States of America.

Mr. Kenneth Werner

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	1. "a pattern of individual light extracting deformities associa	ted
	with respective light sources"	27
	2. "wherein each of the deformities has a length and width	
	substantially smaller than the length and width of the panel	
	surface"	32
	3. "wherein the density, size, depth and/or height of the	
	deformities in close proximity to the input edge is greatest at	
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	sources"	36
	B. The Shinohara Reference Does Not Disclose Limitations of the	'973
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### I. INTRODUCTION

1. The facts set forth below are known to me personally and I have firsthand knowledge of them. I am a United States citizen over eighteen years of age. I am fully competent to testify on the matters in this Declaration. I understand that this Declaration is being submitted along with the Patent Owner's response to the Decision in the Institution of Inter Partes Review by the Patent Trial and Appeal Board ("PTAB") for U.S. Patent No. 7,434,973 (or, the "'973 patent") in IPR2015-00506.

### A. Engagement

2. I have been hired as a technical expert by the owner of the '973 patent to study it and certain prior art and provide my opinions on whether that prior art discloses the limitations of the claims of the '973 patent at issue in the this IPR proceeding.

## B. Background and Qualifications

- 3. In this section, I discuss my educational background, work experience, and other relevant qualifications. My curriculum vitae is attached as Appendix A, which also includes a list of all other cases in which I have testified as an expert at trial or by deposition.
- 4. I have over twenty-seven years of experience in the electronic display industry. I am currently founder and Principal of Nutmeg Consultants. In my current role I regularly address technical and trade organizations in the



Americas and Asia, and I am routinely consulted by financial advisors, analysts, attorneys, members of the international press corps, and by companies entering or repositioning themselves in the display industry. I speak frequently with senior executives of large, mid-sized, and small display-related companies in Asia, Europe, and the Americas, as well as government officials and academic researchers. At BRDisplay II (July 2004, Recife, Brazil), I served as a consultant to the working groups developing a national strategy for the growth of a display-related industry in Brazil and wrote the introduction to their report.

- 5. I also serve as Senior Analyst for Meko, Ltd. Until recently I served as Marketing Director for Tannas Displays (Orange, California). In that positon, I did extensive research on markets for custom-sized and bar-type displays, particularly for signage applications. I am a founding co-editor of MEKO's Display Daily, and a regular contributor to HDTVexpert.com.
- 6. I began my career as a semiconductor device design engineer for RCA. I hold a B.A. in physics from Rutgers University and an M.S. in solid-state physics from the University of North Carolina at Chapel Hill. And I have taken graduate management courses at the University of Connecticut.
- 7. I have been an active participant in the display industry since 1987. From 1987-2005, I was the Editor of Information Display Magazine. I



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