

REQUEST FOR *INTER PARTES* REVIEW

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re application of

Docket No: PR00024

Jeffery R. Parker, et al.

Issued: May 3, 2005

U.S. Patent No. 6,886,956

Application No. 10/298,367

Filing Date: November 18, 2002

For: **LIGHT EMITTING PANEL ASSEMBLIES FOR USE IN
AUTOMOTIVE APPLICATIONS AND THE LIKE**

REQUEST FOR *INTER PARTES* REVIEW

OF U.S. PATENT NO. 6,886,956 UNDER 35 U.S.C. §§311-319, 37 C.F.R. § 42

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Pursuant to 35 U.S.C. §§ 311–319 and 37 C.F.R. § 42, Petitioners Koito Manufacturing Co., Ltd. and Stanley Electric Co., Ltd. (“Petitioners”) respectfully petition for *Inter Partes* Review (“Petition” or “IPR”) of claims 1, 4, 5, 6, 9, 16, 21 and 31 (“challenged claims”) of U.S. Patent No. 6,886,956 (Ex. 1001, “the ’956 patent”), which is currently assigned to Innovative Display Technologies, LLC (“Patent Owner”) according to the US Patent and Trademark Office assignment records. There is a reasonable likelihood that Petitioners will prevail with respect to at least one of the claims challenged in this Petition.

TABLE OF CONTENTS

- I. Mandatory Notices Under 37 C.F.R. § 42.8(a)(1)..... 1
 - A. Real Party-In-Interest Under 37 C.F.R. § 42.8(b)(1) 1
 - B. Related Matters Under 37 C.F.R. § 42.8(b)(2)..... 1
 - C. Lead and Back-Up Counsel 37 C.F.R. § 42.8(b)(3)..... 2
 - D. Service Information 37 C.F.R. § 42.8 (b)(4) 2
- II. Payment of Fees — 37 C.F.R. § 42.103 2
- III. Requirements For IPR Under 37 C.F.R. §§ 42.104..... 3
 - A. Grounds for Standing Under 37 C.F.R. § 42.104(a) 3
 - B. Effective Filing Dates and Prior Art Patents and Printed Publications. 3
 - C. Identification of Challenge Under 37 C.F.R. § 42.104(b) and Relief Requested 4
- IV. Summary of The '956 Patent 5
 - A. Brief Description 5
 - B. Summary of the Prosecution History of the '956 patent 7
- V. Claim Construction..... 8
 - A. "light extracting deformities" (claim 1) 9
- VI. THERE IS A REASONABLE LIKELIHOOD THAT AT LEAST ONE CLAIM OF THE '956 PATENT IS UNPATENTABLE 10
 - A. Ground 1: Claims 1, 5, 6, 9 and 31 are Anticipated Under 35 U.S.C. § 102(b) by JP '602 10
 - 1. Brief Overview Of JP '602 10
 - 2. Claims 1, 5, 6, 9 and 31 are Anticipated by JP '602..... 11

B.	Ground 2: Claims 4, 16 and 21 are Obvious under 35 U.S.C. § 103(a) by JP '602 in view of Pristash (Ex. 1003 and Ex. 1007)	20
1.	Brief Overview of Pristash.....	20
2.	Claims 4, 16 and 21 are Obvious under 35 U.S.C. § 103(a) by JP '602 in view of Pristash (Ex. 1004 and Ex. 1007)	24
C.	Ground 3: Claims 1, 5, 6, 9, 16, 21 and 31 are unpatentable as obvious by JP '004 in view of JP '602.....	29
1.	Brief Overview Of JP '004	30
2.	Claims 1, 5, 6, 9, 16, 21 and 31 of the '956 patent are invalid as obvious over JP '004 in view of JP '602.....	32
VII.	Conclusion	42

EXHIBITS

Exhibit	Description
1001	U.S. Patent No. 6,886,956
1002	File History of U.S. Patent No. 6,886,956
1003	JP H5-25602U (“JP ’602”)
1004	Certified Translation of JP ’602
1005	JP H1-92004U (“JP ’004”)
1006	Certified Translation of JP ’004
1007	U.S. Patent No. 5,005,108 to Pristash et al. (“US ’108” or “Pristash”)
1008	Declaration of Dr. Edward F. Carome in Support of Petitioners’ Request for <i>Inter Partes</i> Review
1009	Power of Attorney

I. MANDATORY NOTICES UNDER 37 C.F.R. § 42.8(a)(1)

A. Real Party-In-Interest Under 37 C.F.R. § 42.8(b)(1)

Petitioner Koito Manufacturing Co., Ltd.; its subsidiary North American Lighting, Inc.; Petitioner Stanley Electric Co., Ltd.; and its subsidiaries Stanley Electric U.S. Co., Inc., I I Stanley Co., Inc. and Stanley Electric Holding of America, Inc. are the real parties-in-interest.

B. Related Matters Under 37 C.F.R. § 42.8(b)(2)

Pursuant to 37 C.F.R. § 42.8(b)(2), Petitioners state that the '956 patent is the subject of at least the following patent infringement lawsuits brought by the assignee, Innovative Display Technologies, LLC ("IDT"), which may affect, or be affected by, a decision in this proceeding: *Innovative Display Technologies LLC v. Toyota Motor Corporation,, et al.*, C.A. (2:14- cv-200) (E.D. Texas) filed March 10, 2014,; *Innovative Display Technologies LLC v. Nissan Motor Co., Ltd et al.* C.A. (2:14-cv-202) (E.D. Texas) filed March 10, 2014; *Innovative Display Technologies, LLC v. American Honda Motor Co., Inc. et al.* (2:14-cv-222) (E. D. Texas) filed March 13, 2014, and *Innovative Display Technologies LLC v General Motors Company et al.* (1:14-cv-00850) (D. Del.), filed June 30, 2014, respectively.

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