

Case IPR2015-00575

Pat. 6,886,956

Filed on behalf of Innovative Display Technologies LLC

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UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

KOITO MANUFACTURING CO. LTD. and STANLEY ELECTRIC CO. LTD.
Petitioners,

v.

INNOVATIVE DISPLAY TECHNOLOGIES LLC,
Patent Owner.

Case IPR2015-00575
Patent 6,886,956

PATENT OWNER'S PRELIMINARY RESPONSE

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TABLE OF AUTHORITIES

Cases

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<i>Atlanta Gas Light Co. v. Bennett Regulator Guards Inc.</i> , Case IPR2013-00453 (PTAB Jan. 6, 2015)	2
<i>Innovative Display Technologies LLC v. Hyundai Motor Co. et al.</i> , No. 2:14-cv-201 (E.D. Tex.)	9
<i>Zoll Lifecor Corp. v. Phillips Elec. N. America Corp.</i> , Case IPR2013-00609, Paper 15 at p.11 (PTAB -----)	4

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Regulations

77 Fed. Reg. 48756	2
77 Fed. Reg. 48759	2

PATENT OWNER'S EXHIBITS

Exhibit No.	Description
2001	Nissan Motor Co., Ltd and Nissan North America, Inc.'s Third Party Complaint, <i>Innovative Display Technologies LLC v. Hyundai Motor Co. et al.</i> , No. 2:14-cv-201 (E.D. Tex.)
2002	Stanley Electric U.S. Co. Inc.'s Corporate Disclosure Statement, <i>Innovative Display Technologies LLC v. Hyundai Motor Co. et al.</i> , No. 2:14-cv-201 (E.D. Tex.)
2003	Stanley Electric Sales of America Inc.'s Corporate Disclosure Statement, <i>Innovative Display Technologies LLC v. Hyundai Motor Co. et al.</i> , No. 2:14-cv-201 (E.D. Tex.)
2004	Stanley Electric Co. Ltd.'s Corporate Disclosure Statement, <i>Innovative Display Technologies LLC v. Hyundai Motor Co. et al.</i> , No. 2:14-cv-201 (E.D. Tex.)
2005	Claim Construction Order, <i>Innovative Display Technologies LLC v. Hyundai Motor Co. et al.</i> , No. 2:14-cv-201 (E.D. Tex.) (Dkt. 244)
2006	Certified Translation of French Patent No. 1,474.,359 – Erwin Hitzelberger

I. INTRODUCTION

Pursuant to 35 U.S.C. § 313 and 37 C.F.R. § 42.107, Patent Owner Innovative Display Technologies LLC (“Patent Owner” or “IDT”) hereby files this preliminary response to the petition for Inter Partes Review of U.S. Patent No. 6,886,956 (“the Petition”) in IPR2015-00575 filed by Koito Manufacturing Co. Ltd. and Stanley Electric Co. Ltd. (“Petitioners”).

The PTAB should deny the Petition’s request to institute an *inter partes* review (“IPR”) of U.S. Patent No. 6,886,956 (“the ’956 patent”) because it fails to identify all real parties-in-interest. In addition, while Patent Owner believes that the Petition does not demonstrate a reasonable likelihood of the challenged claims being invalid, Patent Owner raises specific arguments with respect to at least with respect to Claims 4, 16 and 21 of the patent to address issues that may not be readily apparent from the Petition itself.

This Response is timely under 35 U.S.C. § 313 and 37 C.F.R. § 42.107, as it is filed within three months of the February 6, 2015 date of the Notice of Filing Date Accorded to Petition and Time for Filing Patent Owner Preliminary Response (Paper No. 5). In this Preliminary Response, Patent Owner has limited its identification of the deficiencies in Petitioners’ arguments. Patent Owner does not intend to waive any arguments by not addressing them in this Preliminary

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