

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

**INNOVATIVE DISPLAY
TECHNOLOGIES LLC,**

Plaintiff,

v.

**ACER INC. AND ACER AMERICA
CORP.,**

Defendants.

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**C.A. No. 2:13-cv-522
(Consolidated – Lead Case)**

JURY TRIAL DEMANDED

PLAINTIFF’S OPENING CLAIM CONSTRUCTION BRIEF

Plaintiff Innovative Display Technologies LLC (“Plaintiff” or “IDT”) hereby files its opening claim construction brief pursuant to the Court’s Docket Control Order, Dkt. No. 37.

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I. PATENTS-IN-SUIT

IDT asserts seven United States patents in this lawsuit: (1) 6,755,547 (“the ’547 patent”); (2) 7,300,194 (“the ’194 patent”); 7,404,660 (“the ’660 patent”); (4) 7,384,177 (“the ’177 patent”); (5) 7,434,974 (“the ’974 patent”); 7,537,370 (“the ’370 patent”); and 8,215,816 (“the ’816 patent”) (collectively, the “patents-in-suit”). The seven patents-in-suit all share a common parent patent and have virtually the same written descriptions, with only minor variations between them. The patents-in-suit also share the same inventor, Jeffery R. Parker. Generally, the patents-in-suit relate to the field of backlights, which can be used to illuminate liquid crystal displays, known as LCDs.

II. TECHNOLOGY OVERVIEW

Many consumer products today, such as televisions, laptops, smart phones, and tablets, use LCDs to display images and video. The liquid crystals inside an LCD are its operative parts. Liquid crystals themselves do not emit light. Therefore, for an LCD to produce an image that we can see, the LCD requires a separate light source. Typical LCDs use a backlight for that light source. A backlight sits behind the LCD and shines light through the LCD toward the viewer. A basic backlight for an LCD consists of several parts: a panel (sometimes called a light guide or optical conductor), an LED strip (light sources), a tray, and films, as seen in the simplified graphic at Illustration 1 below.

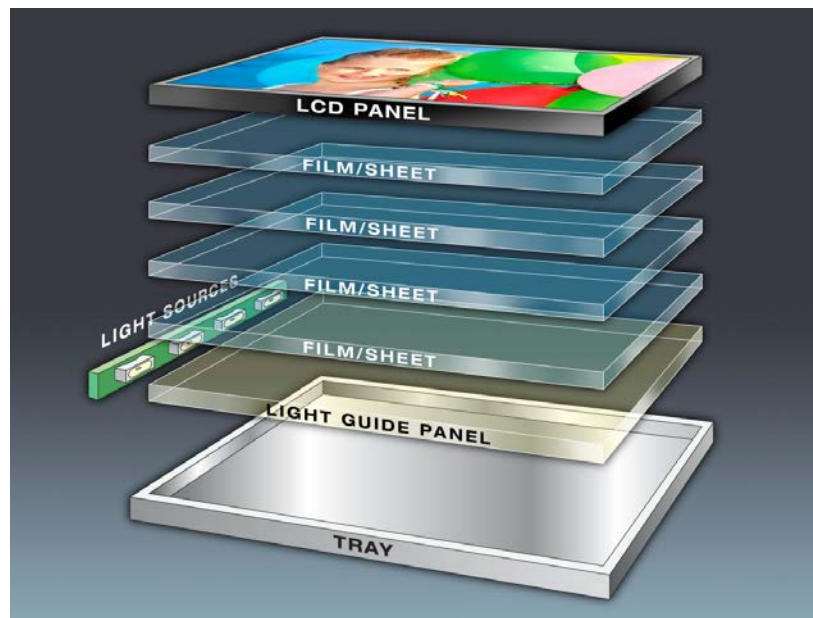


Illustration 1

In the accused products, the panel of a backlight receives light from a strip of light emitting diodes (“LEDs”) on its edge(s). A backlight’s panel uses an arrangement of deformities improve the efficiency, uniformity, and the visual appearance of light it emits. When light hits one of the deformities on the panel, it is either emitted from the panel at that point or it is reflected to the opposite side of the panel and emitted on that side.

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