

IPR Petition of U.S. Patent No. 6,886,956

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

TOYOTA MOTOR CORPORATION

Petitioner

v.

INNOVATIVE DISPLAY TECHNOLOGIES LLC

Patent Owner

Case No.: IPR2015-00829

Patent No. 6,886,956

Title: Light Emitting Panel Assemblies for
Use in Automotive Applications and the Like

**PETITION FOR *INTER PARTES* REVIEW
OF U.S. PATENT NO. 6,886,956**

Mail Stop Patent Board
Patent Trial and Appeal Board
P.O. Box 1450
Alexandria, VA 22313-1450

Table of Contents

I. Introduction.....1

II. Grounds for Standing.....1

III. Identification of Challenge1

 A. Overview of the '956 Patent.....1

 1. The '956 Patent Specification.....2

 2. The '956 Patent Claims.....4

 3. The '956 Patent Prosecution History5

 B. Claim Construction of the Challenged Claims5

 C. Level of Skill in the Art.....7

 D. Statement of Precise Relief Requested for Each Claim
 Challenged.....7

 1. Claims for Which Review Is Requested7

 2. Statutory Grounds of Challenge7

 E. Overview of the Cited Art.....8

 1. Decker (1993)12

 2. Tsuboi (1982).....14

 3. Asai (1986).....16

 4. Additional References Containing Relevant Teachings.....18

IV. Detailed Explanation of the Challenge.....18

 A. *Ground 1*: Decker anticipates claims 1, 4-6, 9, and 31 under
 35 U.S.C. § 102(b).....18

 1. Chart comparing Decker to claims 1, 4-6, 9, and 3124

B.	<i>Ground 2: Claims 1, 4-6, 9, and 31 are unpatentable under 35 U.S.C. § 103 as obvious over Tsuboi in view of Asai, further in view of Gage and Lister.</i>	29
1.	Tsuboi in view of Asai provides every feature of the Challenged Claims	30
2.	Motivation to combine Asai’s light guide features with Tsuboi’s light guide	38
3.	Additional motivation to use an LED light source – Gage and Lister.....	41
4.	Chart comparing Tsuboi in combination with Asai, in view of Gage and Lister, to claims 1, 4-6, 9 and 31	42
C.	<i>Ground 3: Claim 4 is invalid under 35 U.S.C. § 103(a) as obvious over Decker in view of Arima.</i>	47
1.	Motivation to combine Decker with Arima to position the substrate “against” the light guide	48
2.	Chart comparing Decker in view of Arima to claim 4	50
D.	<i>Ground 4: Claim 4 is invalid under 35 U.S.C. § 103(a) as obvious over Decker in view of Tsuboi.</i>	51
1.	Motivation to combine Decker with Tsuboi to position the substrate “against” the light guide	51
2.	Chart comparing Decker in view of Tsuboi to claim 4	53
V.	Mandatory Notices.....	54
A.	Real Party in Interest	54
B.	Related Matters.....	54
C.	Lead and Backup Counsel, and Service Information.....	58
VI.	Payment of Fees.....	58
VII.	Conclusion	59

TABLE OF AUTHORITIES

	Page(s)
Federal Cases	
<i>In re Johnston</i> , 435 F.3d 1381 (Fed. Cir. 2006)	41
<i>KSR Int’l Co. v. Teleflex Inc.</i> , 550 U.S. 398 (2007).....	42, 50, 53
<i>Ex parte Masham</i> , 2 U.S.P.Q.2d 1647 (BPAI 1987)	38
<i>Research Corp. Techs., Inc. v. Gensia Laboratories, Inc.</i> , 10 Fed. Appx. 856 (Fed. Cir. 2001).....	23, 38
Federal Statutes	
35 U.S.C. § 102.....	7, 12, 18, 56
35 U.S.C. § 103.....	7, 8, 47, 51
35 U.S.C. § 103.....	29
35 U.S.C. § 311.....	7, 59
35 U.S.C. § 315.....	1, 57
Regulations	
37 C.F.R. § 42.8.....	58
37 C.F.R. § 42.15.....	58
Board Authority	
<i>Panel Claw Inc. v. Sunpower Corp.</i> , Paper 7, IPR2014-00386 (June 30, 2014).....	6

IPR Petition of U.S. Patent No. 6,886,956

Manual of Patent Examining Procedure

MPEP § 2111.0423, 38

MPEP § 2114(II)23, 24, 38

Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.