

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

MERCEDES-BENZ USA, LLC and
MERCEDES-BENZ U.S. INTERNATIONAL, INC.,
Petitioner,

v.

INNOVATIVE DISPLAY TECHNOLOGIES LLC,
Patent Owner.

Inter Partes Review of U.S. Patent No. 7,434,974

Issue Date: October 14, 2008

Patent Title: Light Emitting Panel Assemblies

IPR Case No.: *To Be Assigned*

PETITION FOR *INTER PARTES* REVIEW OF CLAIMS 1, 3-5, 7-11, 13, AND
17 OF U.S. PATENT NO. 7,434,974

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PETITIONER'S EXHIBIT LIST

Description	Exhibit #
U.S. Patent No. 7,434,974	1001
Prosecution History of U.S. Patent No. 7,434,974	1002
Complaints filed in Related District Court Cases	1003
Declaration of Michael J. Escuti, Ph.D. ("Escuti Decl.")	1004
U.S. Patent No. 5,461,547 ("Ciupke")	1005
U.S. Patent No. 5,005,108 ("Pristash")	1006
U.S. Patent No. 5,619,351 ("Funamoto")	1007
U.S. Patent No. 5,548,271 ("Tsuchiyama")	1008
U.S. Patent No. 5,654,779 ("Nakayama")	1009
U.S. Patent No. 6,108,060 ("the '060 Patent") and corresponding file history	1010
U.S. Patent No. 5,160,195 ("Miller")	1011
J. A. Castellano, <i>Handbook of Display Technology</i> , Academic Press Inc., San Diego, 1992, at pp. 9-13 and Ch. 8	1012
U.S. Patent No. 5,598,280 ("Nishio")	1013
U.S. Patent No. 5,384,658 ("Ohtake")	1014
U.S. Patent No. 5,303,322 ("Winston")	1015
U.S. Patent No. 5,050,946 ("Hathaway")	1016
EP500960 ("Ohe")	1017
U.S. Patent No. 5,828,488 ("Ouderkirk")	1018
3M product brochure 75-0500-0403-7, "Brightness Enhancement Film (BEF)", 2 pages (1993)	1019
U.S. Patent No. 5,706,134 ("Konno")	1020
U.S. Patent No. 5,944,405 ("Takeuchi")	1021
U.S. Patent No. 5,381,309 ("Borchardt")	1022
U.S. Patent No. 4,915,478 ("Lenko")	1023

Pursuant to 35 U.S.C. §311, Petitioner hereby respectfully request *inter partes* review of Claims 1, 3-5, 7-11, 13, and 17 of Ex. 1001, U.S. Patent No. 7,434,974 (“the ’974 Patent”) which issued on October 14, 2008. The challenged claims are unpatentable under 35 U.S.C. § 103 over the prior art publications identified and applied in this Petition.

I. MANDATORY NOTICES

Pursuant to 37 C.F.R. §42.8, Petitioner provides the following mandatory disclosures:

A. Real Parties-In-Interest. Mercedes-Benz USA, LLC, a Delaware limited liability company with its principal place of business at 1 Mercedes Drive, Montvale, New Jersey 07465, and Mercedes-Benz U.S. International, Inc., an Alabama corporation with its principal place of business at 1 Mercedes Drive, Vance, Alabama 35490, are real parties-in-interest.

B. Related Matters. Pursuant to 37 C.F.R. §42.8(b)(2), Petitioner submits that the ’974 Patent is the subject of a patent infringement lawsuit brought by the Patent Owner, Innovative Display Technologies LLC (*see* Ex. 1003), against Petitioner in the United States District Court for the Eastern District of Texas: *Innovative Display Technologies LLC v. Mercedes-Benz U.S. International, Inc. and Mercedes-Benz USA, LLC*, Case No. 2:14-cv-535. In addition, the ’974 Patent is the subject of another IPR,

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