

UNITED STATES PATENT AND TRADEMARK OFFICE

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**BEFORE THE PATENT TRIAL AND APPEAL BOARD**

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LG ELECTRONICS, INC.  
Petitioner

v.

INNOVATIVE DISPLAY TECHNOLOGIES LLC  
Patent Owner

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**Case: IPR2015-00497**

**Patent 7,434,974**

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**PETITION FOR *INTER PARTES* REVIEW  
OF U.S. PATENT NO. 7,434,974**

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**PETITIONER'S EXHIBIT LIST**

<b>Description</b>	<b>Exhibit #</b>
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. LG Electronics U.S.A., Inc. is a real party-in-interest with Petitioner, LG Electronics, Inc.

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 District of Delaware: *Delaware Display Group LLC and Innovative Display Technologies LLC v. LG Electronics, Inc., LG Electronics U.S.A., Inc., LG Display Co., Ltd., and LG Display America, Inc.*, Case No. 1:13-cv-02109. The ’974 Patent is also asserted in at least the actions listed in the chart below.

Description	Docket Number
<i>IDT v. AT&amp;T Inc., et. al.</i>	2:14-cv-00720, EDTX
<i>IDT v. BMW of North America, LLC, et. al.</i>	2:14-cv-00106, EDTX
<i>IDT v. Dell Inc.</i>	2:13-cv-00523, EDTX

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