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

# TOYOTA MOTOR CORPORATION Petitioner

# v. INNOVATIVE DISPLAY TECHNOLOGIES LLC Patent Owner

Case IPR2015-00831 U.S. Patent No. 7,434,974

# PATENT OWNER MANDATORY NOTICES PURSUANT TO 37 C.F.R. §§ 42.8(a)(2) and 42.8(b)

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Patent Owner Innovative Display Technologies ("IDT") hereby files its mandatory notices pursuant to 37 C.F.R. §§ 42.8(a)(2) and 42.8(b):

## A. Section 42.8(b)(1) – Real Party-In-Interest

Patent Owner identifies Acacia Research Group LLC and Acacia Research Corporation as its real parties-in-interest.

### B. Section 42.8(b)(2) – Related Matters

### 1. Litigation

Patent Owner asserts that Petitioner infringes the patent at issue in this *inter* partes review petition in the following lawsuit: *Innovative Display Technologies* LLC v. Toyota Motor Corp. et al., No. 2:14-cv-00200 (E.D. Tex., filed Mar. 10, 2014). In addition to that lawsuit, Patent Owner has alleged infringement of the patent at issue in this *inter partes* review petition in the following matters:

- 1. Innovative Display Technologies LLC v. Acer Inc., et al., No. 2:13-cv-00522 (E.D. Tex., filed June 28, 2013);
- 2. Innovative Display Technologies LLC v. Dell Inc., No. 2:13-cv-00523 (E.D. Tex., filed June 28, 2013);
- 3. Innovative Display Technologies LLC v. Hewlett-Packard Company, No. 2:13-cv-00524 (E.D. Tex., filed June 28, 2013);
- 4. Innovative Display Technologies LLC v. Huawei Investment and Holding Co., Ltd. et al., No. 2:13-cv-00525 (E.D. Tex., filed June 28, 2013);



- 5. Innovative Display Technologies LLC v. Blackberry Ltd. et al., No. 2:13-cv-00526 (E.D. Tex., filed June 28, 2013);
- 6. *Innovative Display Technologies LLC v. ZTE Corporation et al.*, No. 2:13-cv-00527 (E.D. Tex., filed June 28, 2013);
- 7. Innovative Display Technologies LLC v. Microsoft Corp., No. 2:13-cv-00783 (E.D. Tex., filed Oct. 1, 2013);
- 8. Innovative Display Technologies LLC v. Nokia Corp. et al., No. 2:13-cv-00784 (E.D. Tex., filed Oct. 1, 2013);
- 9. Innovative Display Technologies LLC v. Apple Inc., No. 2:14-cv-00030 (E.D. Tex., filed Jan. 17, 2014);
- 10. Innovative Display Technologies LLC v. BMW of North America, LLC et al., No. 2:14-cv-00106 (E.D. Tex., filed Feb. 21, 2014);
- 11. Innovative Display Technologies LLC v. Canon U.S.A. Inc. et al., No. 2:14-cv-00142 (E.D. Tex., filed Feb. 26, 2014);
- 12. Innovative Display Technologies LLC v. Garmin International, Inc. et al., No. 2:14-cv-00143 (E.D. Tex., filed Feb. 26, 2014);
- 13.Innovative Display Technologies LLC v. MiTAC Digital Corporation et al., No. 2:14-cv-00144 (E.D. Tex., filed Feb. 26, 2014);
- 14. Innovative Display Technologies LLC v. Nikon, Inc. et al., No. 2:14-cv-00145 (E.D. Tex., filed Feb. 27, 2014);



- 15.Innovative Display Technologies LLC v. TomTom North America Inc. et al., No. 2:14-cv-00146 (E.D. Tex., filed Feb. 27, 2014);
- 16. *Innovative Display Technologies LLC v. Hyundai Motor Group et al.*, No. 2:14-cv-00201 (E.D. Tex., filed Mar. 10, 2014);
- 17. Innovative Display Technologies LLC v. Nissan Motor Co., Ltd. et al., No. 2:14-cv-00202 (E.D. Tex., filed Mar. 10, 2014);
- 18. Innovative Display Technologies LLC v. Volkswagen AG et al., No. 2:14-cv-00300 (E.D. Tex., filed Apr. 7, 2014);
- 19. Innovative Display Technologies LLC et al. v. Apple Inc., No. 2:14-cv-00301 (E.D. Tex., filed Apr. 8, 2014);
- 20. Innovative Display Technologies LLC v. Google Inc., et al., No. 2:14-cv-00302 (E.D. Tex., filed Apr. 8, 2014);
- 21. Innovative Display Technologies LLC v. Best Buy Co., Inc. et al., No. 2:14-cv-00532 (E.D. Tex., filed Apr. 24, 2014);
- 22.Innovative Display Technologies LLC v. Mercedes-Benz U.S. International, Inc. et al., No. 2:14-cv-00535 (E.D. Tex., filed Apr. 24, 2014).
- 23. Innovative Display Technologies LLC v. Mazda Motor Corporation et al., No. 2:14-cv-00624 (E.D. Tex., filed May 13, 2014);



- 24. Innovative Display Technologies LLC et al. v. AT&T Inc. et al., No. 2:14-cv-00720 (E.D. Tex., filed June 25, 2014);
- 25.Innovative Display Technologies LLC et al. v. Sprint Corporation et al., No. 2:14-cv-00721 (E.D. Tex., filed June 25, 2014);
- 26.Innovative Display Technologies LLC et al. v. Verizon Communications, Inc. et al., No. 2:14-cv-00722 (E.D. Tex., filed June 25, 2014);
- 27. Innovative Display Technologies LLC et al. v. T-Mobile US, Inc. et al., No. 2:14-cv-00723 (E.D. Tex., filed June 25, 2014);
- 28. Delaware Display Group LLC et al. v. Amazon.com Inc., No. 1:13-cv-02106 (D. Del., filed Dec. 31, 2013);
- 29. Delaware Display Group LLC et al. v. HTC Corporation et al., No. 1:13-cv-02107 (D. Del., filed Dec. 31, 2013);
- 30. Delaware Display Group LLC et al. v. Lenovo Holding Company Inc. et al., No. 1:13-cv-02108 (D. Del., filed Dec. 31, 2013);
- 31. Delaware Display Group LLC et al. v. Pantech Co. Ltd. et al., No. 1:13-cv-02110 (D. Del., filed Dec. 31, 2013);
- 32. Delaware Display Group LLC et al. v. LG Electronics Inc. et al., No. 1:13-cv-02109 (D. Del., filed Dec. 31, 2013);
- 33. Delaware Display Group LLC et al. v. Sony Corp. et al., No. 1:13-cv-02111 (D. Del., filed Dec. 31, 2013);



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