

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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

v.

INNOVATIVE DISPLAY TECHNOLOGIES LLC,  
*Patent Owner.*

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*Inter Partes* Review of U.S. Patent No. 7,384,177

Issue Date: June 10, 2008

Patent Title: Light Emitting Panel Assemblies

IPR Case No.: *To Be Assigned*

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PETITION FOR *INTER PARTES* REVIEW OF CLAIMS 1-3,5-7, 9-10, 13-15, 19,  
21, and 23-27 OF U.S. PATENT NO. 7,384,177

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## PETITIONER'S EXHIBIT LIST

Description	Exhibit #
U.S. Patent No. 7,384,177	1001
Prosecution History of U.S. Patent No. 7,384,177	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. 5,054,885 ("Melby")	1006
U.S. Patent No. 5,453,855 ("Nakamura")	1007
U.S. Patent No. 4,142,781 ("Baur")	1008
U.S. Patent No. 5,432,626 ("Sasuga")	1009
U.S. Patent No. 5,005,108 ("Pristash")	1010
U.S. Patent No. 5,567,042 ("Farchmin")	1011
U.S. Patent No. 5,160,195 ("Miller")	1012
J. A. Castellano, <i>Handbook of Display Technology</i> , Academic Press Inc., San Diego, 1992, at pp. 9-13 and Ch. 8	1013
U.S. Patent No. 5,598,280 ("Nishio")	1014
U.S. Patent No. 5,384,658 ("Ohtake")	1015
U.S. Patent No. 5,303,322 ("Winston")	1016
U.S. Patent No. 5,050,946 ("Hathaway")	1017
European Patent Application Publication No. EP500960 ("Ohe")	1018
U.S. Patent No. 5,828,488 ("Ouderkirk")	1019
3M product brochure 75-0500-0403-7, "Brightness Enhancement Film (BEF)." 2 pages (1993)	1020
U.S. Patent No. 5,706,134 ("Konno")	1021
U.S. Patent No. 5,944,405 ("Takeuchi")	1022
U.S. Patent No. 5,381,309 ("Borchardt")	1023

Pursuant to 35 U.S.C. §311, Petitioner hereby respectfully requests *inter partes* review of Claims 1-3, 5-7, 9-10, 13-15, 19, 21, and 23-27 of Ex. 1001, U.S. Patent No. 7,384,177 (“the ‘177 Patent”) which issued on June 10, 2008. The challenged claims are unpatentable under 35 U.S.C. §§102 and 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 ‘177 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 ‘177 Patent is the subject of another IPR,

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