

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

LG DISPLAY CO., LTD.
Petitioner

v.

INNOVATIVE DISPLAY TECHNOLOGIES LLC
Patent Owner

Case: IPR2014-01097

Patent 7,300,194

**PETITION FOR *INTER PARTES* REVIEW
OF U.S. PATENT NO. 7,300,194**

TABLE OF CONTENTS

I.	MANDATORY NOTICES.....	1
II.	PAYMENT OF FEES.....	3
III.	STANDING.....	4
IV.	REQUEST FOR <i>INTER PARTES</i> REVIEW OF CLAIMS 1, 4-6, 16, 22, 23, 27, 28, AND 31 OF THE '194 PATENT	4
	A. Technology Background	4
	B. The Alleged Invention Of The '194 Patent.....	5
V.	CLAIM CONSTRUCTION	7
	A. Standards For Claim Construction	7
	1. Broadest Reasonable Construction.....	7
	B. “deformities” (claims 1, 16, 28, 31).....	7
VI.	SUMMARY OF PRIOR ART TO THE '194 PATENT FORMING THE BASIS FOR THIS PETITION	8
	A. Admitted Prior Art.....	8
	B. U.S. Patent No. 5,005,108 (“Pristash”) (Ex. 1006).....	8
	C. U.S. Patent No. 5,619,351 (“Funamoto”) (Ex. 1007).....	9
	D. JP H06-273756 (“Gyoko”) (Ex. 1008)	9
	E. U.S. Patent No. 5,408,388 (“Kobayashi”) (Ex. 1011)	10
	F. U.S. Patent No. 5,598,280 (“Nishio”) (Ex. 1012)	10
VII.	GROUND FOR UNPATENTABILITY FOR EACH CLAIM	10
	A. Ground 1: Claims 1, 4-6, And 28 Are Unpatentable Under 35 U.S.C. §103(a) As Being Obvious Over Pristash	11

Patent No. 7,300,194
Petition for *Inter Partes* Review

B.	Ground 2: Claims 1, 16, 22, 23, 27, And 31 Are Unpatentable Under 35 U.S.C. §102(e) As Being Anticipated By Funamoto.....	19
C.	Ground 3: Claims 4, 5, And 6 Are Unpatentable Under 35 U.S.C. §103 As Obvious Over Funamoto.....	29
D.	Ground 4: Claims 16, 22, 23, 27, And 31 Are Unpatentable Under 35 U.S.C. §102(a) As Being Anticipated By Gyoko.....	30
E.	Ground 5: Claim 28 Is Unpatentable Under 35 U.S.C. §102(b) As Being Anticipated By Kobayashi.....	37
F.	Ground 6: Claims 1, 4-6, And 28 Are Unpatentable Under 35 U.S.C. §102(e) As Being Anticipated By Nishio.....	41
G.	Ground 7: Claims 16, 22, 23, 27, And 31 Are Unpatentable Under 35 U.S.C. §103 As Obvious Over Nishio, Alone, Or In The Alternative, In View Of Funamoto.....	48
VIII.	CONCLUSION.....	56

PETITIONER'S EXHIBIT LIST

Description	Exhibit #
U.S. Patent No. 7,300,194	1001
Prosecution History of U.S. Patent No. 7,300,194	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
JP H06-273756 ("Gyoko") (English)	1008
JP H06-273756 ("Gyoko") (Japanese)	1009
JP H06-273756 ("Gyoko") (Certification)	1010
U.S. Patent No. 5,408,388 ("Kobayashi")	1011
U.S. Patent No. 5,598,280 ("Nishio")	1012
U.S. Patent No. 6,108,060 ("the '060 Patent") and corresponding file history	1013
U.S. Patent No. 5,160,195 ("Miller")	1014
J. A. Castellano, <i>Handbook of Display Technology</i> , Academic Press Inc., San Diego, 1992, at pp. 9-13 and Ch. 8	1015
U.S. Patent No. 5,384,658 ("Ohtake")	1016
U.S. Patent No. 5,303,322 ("Winston")	1017
U.S. Patent No. 5,050,946 ("Hathaway")	1018
EP500960 ("Ohe")	1019
U.S. Patent No. 5,828,488 ("Ouderkirk")	1020
3M product brochure 75-0500-0403-7, "Brightness Enhancement Film (BEF)", 2 pages (1993)	1021
U.S. Patent No. 5,706,134 ("Konno")	1022
U.S. Patent No. 5,944,405 ("Takeuchi")	1023
U.S. Patent No. 5,381,309 ("Borchardt")	1024

Pursuant to 35 U.S.C. §311, Petitioner hereby respectfully requests *inter partes* review of Claims 1, 4-6, 16, 22, 23, 27, 28, and 31 of Ex. 1001, U.S. Patent No. 7,300,194 (“the ’194 Patent”) (“Ex. 1001”) which issued on November 27, 2007. 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. LG Display America, Inc. is a real party-in-interest with Petitioner, LG Display Co., Ltd.

B. Related Matters. Pursuant to 37 C.F.R. §42.8(b)(2), Petitioner submits that the ’194 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 ’194 Patent is also asserted in at least the actions listed in the chart below.

Description	Docket Number
<i>Innovative Display Technologies LLC (“IDT”) v. Acer Inc. et al.</i>	2:13-cv-522, EDTX
<i>IDT v. Apple Inc.</i>	2:14-cv-00030, EDTX

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.