

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. 7,384,177

Issue Date: June 10, 2008

Patent Title: Light Emitting Panel Assemblies

IPR Case No.: *To Be Assigned*

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

Scott T. Weingaertner
Registration No. 37,756
King & Spalding LLP
1185 Avenue of the Americas
New York, NY 10036-2601
Tel.: (212) 556-2227
Fax: (212) 556-2222
Email: sweingaertner@kslaw.com

Natasha H. Moffitt
Registration No. 53,340
King & Spalding LLP
1180 Peachtree Street, NE
Atlanta, GA 30309
Tel.: (404) 572-2783
Fax: (404) 572-5134
Email: nmoffitt@kslaw.com

TABLE OF CONTENTS

I.	MANDATORY NOTICES.....	1
II.	PAYMENT OF FEES	4
III.	STANDING	4
IV.	REQUEST FOR <i>INTER PARTES</i> REVIEW OF CLAIMS 1-3, 5-7, 9-10, 13-15, 19, 21, and 23-27 OF THE '177 PATENT	4
	A. Technology Background	5
	B. The Alleged Invention Of The '177 Patent.....	6
	C. The Prosecution History Of The '177 Patent	7
	D. The Independent Claims Of The '177 Patent.....	7
V.	CLAIM CONSTRUCTION	8
	A. Standards For Claim Construction	8
	B. “deformities” (Claim 14, 23-27)	9
VI.	SUMMARY OF PRIOR ART TO THE '177 PATENT FORMING THE BASIS FOR THIS PETITION	9
	A. Admitted Prior Art.....	9
	A. U.S. Patent No. 5,054,885 (“Melby”) (Ex. 1006).....	10
	B. U.S. Patent No. 5,453,855 (“Nakamura”) (Ex. 1007).....	10
	C. U.S. Patent No. 4,142,781 (“Baur”) (Ex. 1008)	10
	D. U.S. Patent No. 5,432,626 (“Sasuga”) (Ex. 1009).....	11
	E. U.S. Patent No. 5,005,108 (“Pristash”) (Ex. 1010).....	11
	F. U.S. Patent No. 5,567,042 (“Farchmin”) (Ex. 1011).....	11
VII.	GROUND FOR UNPATENTABILITY OF EACH CLAIM.....	12
	A. Ground 1: Claims 1-3, 5-7, 9-10, 13-15, 19, 21, And 23-25, 27 Are Unpatentable Under 35 U.S.C. §103(a) As Being Obvious Over Melby.....	12
	B. Ground 2: Claims 1, 2, 6, 7, 9, 10, 13, 14, 15, 19, 21, 23-24, And 26 Are Unpatentable Under 35 U.S.C. §102 As Being Anticipated By Nakamura.....	22
	C. Ground 3: Claims 1, 2, 13, And 14 Are Unpatentable Under 35 U.S.C. §103(a) As Being Obvious Over Baur.....	32
	D. Ground 4: Claims 6, 9, 10, 15, 19, 21, And 23 Are Unpatentable Under 35 U.S.C. §103 As Being Obvious Over Baur In View Of Nakamura .	37
	E. Ground 5: Claims 1, 2, 6, 7, 9, 10, 13, 15, And 21 Are Unpatentable Under 35 U.S.C. §103(a) As Obvious Over Sasuga In View Of Farchmin	43
	F. Ground 6: Claims 14 And 19 Are Unpatentable Under 35 U.S.C. §103(a) As Obvious Over Sasuga In View Of Farchmin In View Of Nakamura.....	53
	G. Ground 7: Claims 23, 25, And 26 Are Unpatentable Under 35 U.S.C. §103(a) As Obvious Over Sasuga In View Of Farchmin In View Of	

Pristash 55
VIII. CONCLUSION.....58

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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