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

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, *Handbook of Display Technology,* 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,

DOCKET ALARM

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.