

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

LG ELECTRONICS, INC.
Petitioner

v.

INNOVATIVE DISPLAY TECHNOLOGIES LLC
Patent Owner

Case: IPR2015-00489

Patent 7,384,177

**PETITION FOR *INTER PARTES* REVIEW
OF U.S. PATENT NO. 7,384,177**

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| | A. U.S. Patent No. 5,054,885 (“Melby”) (Ex. 1006) | 9 |
| | 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)..... | 10 |
| | E. U.S. Patent No. 5,005,108 (“Pristash”) (Ex. 1010) | 11 |
| | F. U.S. Patent No. 5,567,042 (“Farchmin”) (Ex. 1011) | 11 |
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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. LG Electronics U.S.A., Inc. is a real party-in-interest with Petitioner, LG Electronics, Inc.

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 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 ’177 Patent is also asserted in at least the actions listed in the chart below.

| Description | Docket Number |
|---|---------------------|
| <i>IDT v. American Honda Motor Co., et al.</i> | 2:14-cv-00222, EDTX |
| <i>IDT v. AT&T Inc., et al.</i> | 2:14-cv-00720, EDTX |
| <i>IDT v. BMW of North America, LLC, et al.</i> | 2:14-cv-00106, EDTX |

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