

UNITED STATES PATENT AND TRADEMARK OFFICE

---

**BEFORE THE PATENT TRIAL AND APPEAL BOARD**

---

LG DISPLAY CO., LTD.  
Petitioner

v.

SURPASS TECH INNOVATION LLC  
Patent Owner

---

**Case: IPR2015-00885**

**Patent 7,202,843**

---

**PETITION FOR *INTER PARTES* REVIEW  
OF U.S. PATENT NO. 7,202,843**

**TABLE OF CONTENTS**

	<b>Page</b>
I. MANDATORY NOTICES.....	1
II. PAYMENT OF FEES.....	2
III. STANDING.....	3
IV. REQUEST FOR INTER PARTES REVIEW OF CLAIMS 1, 4, 8, AND 9 OF THE '843 PATENT .....	3
A. Specification Of The '843 Patent .....	3
B. Claims 1, 4, 8, and 9 of the '843 Patent .....	9
V. CLAIM CONSTRUCTION.....	10
VI. SUMMARY OF PRIOR ART TO THE '843 PATENT FORMING THE BASES FOR THIS PETITION .....	11
A. Korean Patent Application No. 2002-0073673 (“Lee”).....	11
B. U.S. Patent Application Publication No. 2002/0044115 (“Jinda”).....	13
1. Summary of Jinda.....	13
2. The European Counterpart of the '843 Patent Was Rejected In View of Jinda .....	17
C. Miyai.....	20
VII. TERMINOLOGY.....	21
VIII. GROUNDS FOR UNPATENTABILITY FOR EACH CLAIM.....	22
A. Ground 1: Claims 1, 4, 8, and 9 Are Anticipated By Lee.....	22
B. Ground 2: Claims 1, 4, 8, And 9 Are Obvious Over Jinda In View Of Miyai.....	40
1. Disclosure in Jinda and Miyai.....	40
2. Motivation to Combine.....	45
C. Ground 3: Claims 1, 4, 8, And 9 Are Anticipated By Jinda .....	56
B. Ground 4: Claims 1, 4, 8, And 9 Are Obvious Over Jinda.....	59
IX. CONCLUSION.....	60

**PETITIONER'S EXHIBIT LIST**

<b>Description</b>	<b>Exhibit #</b>
U.S. Patent No. 7,202,843	1001
Complaint filed in District Court Case No. 1:14-cv-00336 (D. Del.)	1002
Complaints filed in Related District Court Cases	1003
Petition filed in IPR2015-00021	1004
U.S. Prosecution History of U.S. Patent No. 7,202,843	1005
Selected Documents from Prosecution History of European Patent Application No. 03029643.8	1006
Selected Documents from Prosecution History of Japanese Laid-Open Patent Publication No. 4199655 and Certified English Translation Thereof History of Thereof	1007
U.S. Patent Application Publication No. 2002/0044115 ("Jinda")	1008
Japanese Laid Open Application Publication JPH0662355A ("Miyai") and Certified English Translation Thereof	1009
Korean Patent Application No. 2000-0073673 ("Lee") and Certified English Translation Thereof	1010
Declaration of Richard Zech, Ph.D.	1011

Pursuant to 35 U.S.C. § 311, Petitioner hereby respectfully requests *inter partes* review of Claims 1, 4, 8, and 9 of U.S. Patent No. 7,202,843 (“the ’843 Patent”)(Ex. 1001), which issued on April 10, 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 (the “Petition”).

## **I. MANDATORY NOTICES**

Pursuant to 37 C.F.R. §42.8, Petitioner discloses the following:

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 ’843 Patent is the subject of a patent infringement lawsuit brought by the Patent Owner, Surpass Tech Innovation LLC (“Surpass”) (*see* Ex. 1002), against Petitioner in the United States District Court for the District of Delaware, Case No. 1:14-cv-00336, captioned *Surpass Tech Innovation LLC v. LG Display Co. Ltd. and LG Display America, Inc.* The ’843 Patent has also been asserted in *Surpass Tech Innovation LLC v. Samsung Display Co., Ltd., et al.*, Case No. 1:14-cv-337 (D. Del.) and *Surpass Tech Innovation LLC v. Sharp Corporation, et al.*, Case No. 1:14-cv-338 (D. Del.). *See* Ex. 1003 (Complaints filed in related district court actions). All of the foregoing cases are currently stayed. The ’843 Patent is also the subject of IPR2015-00021, which was filed October 3, 2014. *See* Ex. 1004 (Petition).

C. Lead and Back-up Counsel.

Petitioner provides the following designation of counsel:

LEAD COUNSEL	BACK-UP COUNSEL
Robert G. Pluta Registration No. 50,970 MAYER BROWN LLP 71 S. Wacker Drive Chicago, IL 60606 Telephone: 312-701-8641 Facsimile: 312-701-7711 rpluta@mayerbrown.com	William J. Barrow Registration No. 62,813 MAYER BROWN LLP 1999 K Street, N.W. Washington, DC 20006 Telephone: 202.263.3000 Facsimile: 202.263.3300 wbarrow@mayerbrown.com  Amanda K. Streff Registration No. 65,224 MAYER BROWN LLP 71 S. Wacker Drive Chicago, IL 60606 Telephone: 312-701-8645 Facsimile: 312-701-7711 <a href="mailto:astreff@mayerbrown.com">astreff@mayerbrown.com</a>

D. Service Information. Pursuant to 37 C.F.R. §42.8(b)(4), Petitioner identifies the following service information: Please direct all correspondence regarding this proceeding to lead counsel at the address identified above. Petitioner consents to electronic service by email to rpluta@mayerbrown.com, wbarrow@mayerbrown.com, and astreff@mayerbrown.com, with a courtesy copy sent to SURPASSIPR843@mayerbrown.com.

**II. PAYMENT OF FEES**

Pursuant to 37 C.F.R. § 42.103, \$23,000 is being paid at the time of filing this

# 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.