

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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LG DISPLAY CO., LTD.  
Petitioner,

v.

SURPASS TECH INNOVATION LLC  
Patent Owner.

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Case IPR2015-00885  
Patent 7,202,843 B2

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**DECLARATION OF WILLIAM K. BOHANNON  
IN RESPONSE TO PETITION OF LG DISPLAY CO., LTD.**

I, William K. Bohannon, hereby declare as follows:

I have been retained by Patent Owner Surpass Tech Innovation LLC to provide my opinions in support of its Response to the Petition for *Inter Partes* Review of Patent No. 7,202,843 (the '843 patent). I am being compensated for my time at the rate of \$250 per hour. I have no interest in the outcome of this proceeding.

## **I. BACKGROUND AND QUALIFICATIONS**

1. I am currently employed as an independent electronics and display technologies expert and consultant. My background and qualifications are set forth in my *curriculum vitae*, attached as Appendix A.

2. As set forth in my *curriculum vitae*, I have an undergraduate degree in Mathematics, graduate work in mathematics, physics, and computer science, and over thirty years of professional experience in the areas of displays and electronics.

3. During this time, I have worked as a consultant, as an expert, as a named inventor on seven patents, and as a company founder and executive. Specific display technologies that I have worked with include all aspects of LCD projector design, LCD control electronics including various LCD drive electronics circuits, and testing equipment for LCD drive electronics and display performance. I have invented and designed LCD projection systems and their associated control

electronics and in addition I have worked with various LC device and component manufacturers to develop custom LCD components.

4. My experience includes decades of electronics and display product development. It also includes consulting and providing expert experience in many aspects of the display electronics field. I have experience as a design engineer, systems architect, principal engineer, project manager, and company executive, as well as experience in reverse engineering.

5. I have many years of experience in designing, developing, manufacturing and testing electronic display systems. As an independent consultant and analyst, I also acquired, analyzed, tested and then published the test results for over one hundred different display systems produced by major electronics manufacturers. The company I helped to found, Planet ATE, developed many unique electronic test technologies that were used by major, worldwide electronics companies to test various electronics circuits including LCD drivers.

6. My additional experience is listed in my *curriculum vitae*, attached as an Appendix to this declaration.

## **II. MATERIALS CONSIDERED**

7. In forming my opinions, in addition to my knowledge and experience, I have considered the following documents and things that I have obtained, or that

have been provided to me, as well as any other references cited herein that may not be listed below:

- U.S. Patent No. 7,202,843 to Shen *et al.*, (Ex. 1001) along with aspects of its prosecution history before the U.S. Patent & Trademark Office (Ex. 1005)
- English Translation of Korean Patent Application No. 2000-0073673 (“Lee”) (Ex. 1010)
- The Petition for *Inter Partes* Review filed by the Petitioners against the ‘843 patent (IPR2015-00885), focusing on the instituted ground based on Lee alone
- Declaration of Richard Zech, Ph.D. (Ex. 1011)
- Transcript for Deposition of Richard Zech, Ph.D. dated November 13, 2015 (Ex. 2007)

### **III. THE PERSON OF ORDINARY SKILL IN THE ART AND LEGAL STANDARD IN *INTER PARTES* REVIEW**

8. The ‘843 patent relates to methods and circuitry for driving an LCD panel. I understand that the factors considered in determining the level of ordinary skill in the art include education and experience of persons working in the art, and the types of problems encountered in the art. Based on these factors, in my opinion,

a person of ordinary skill in the relevant art of the '843 patent has at least a bachelor's degree in electrical engineering, mathematics, or computer science with two or more years of experience in designing electronics and displays. For example, a person of ordinary skill in the art would have education and experience sufficient to understand both the disclosures of Lee and the background of the '843 patent's specification. This includes the ability to understand the overdriving concept as it is discussed in the '843 patent. I would expect this background to include experience in LCD control electronics. A person having this background would understand factors associated with driving electronic impulses, and would also understand the concepts of pixel voltage versus light transmission and pixel response time.

9. My opinions contained in this declaration are given from the perspective of a person of ordinary skill in the art at the time of the November 17, 2003 filing of the Taiwanese application No. 92132122 A upon which the '843 patent is based, unless specifically stated, even if my opinion is expressed in the present tense. As of November 17, 2003, I satisfied the standard of a person of ordinary skill in the art described above in ¶8.

10. In an *inter partes* review (IPR) proceeding before the Patent Trial and Appeal Board, I understand that a petitioner has the burden to prove patent invalidity by a "preponderance of the evidence" standard. I have evaluated the

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