

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

LG DISPLAY CO., LTD.
Petitioners

v.

SURPASS TECH INNOVATION LLC
Patent Owner

Case IPR2015-00885
Patent 7,202,843

**PATENT OWNER SURPASS TECH INNOVATION LLC'S
RESPONSE UNDER 37 C.F.R. § 42.120**

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LIST OF PATENT OWNER'S EXHIBITS

<u>Exhibit</u>	<u>Description</u>
2001	“Petitioner and His Money are Soon Parted: Separate Fee Payments Do Not Reduce Risk of Non-Institution of Redundant Grounds”; Authored by M. Carniaux and M. Sander; interpartesreviewblog.com, dated November 13, 2014 (accessed June 1, 2015)
2002	Joint Stipulation to Stay Cases Pending <i>Inter Partes</i> Review, filed November 20, 2014
2003	Order Granting Joint Stipulation to Stay Cases Pending <i>Inter Partes</i> Review, entered November 21, 2014
2004	Transcript for the Deposition of Thomas Credelle dated October 28, 2015, in IPR2015-00863
2005-2006	Reserved
2007	Transcript for the Deposition of Richard Zech, Ph.D. dated November 13, 2015, in IPR2015-00885
2008 – 2016	Reserved
2017	Declaration of William K. Bohannon in Response to Petition of LG Display Co., Ltd.

I. Introduction

a. The Petition's Analysis of the Asserted Art is Fundamentally Flawed

LG Display Co., Ltd. ("LG") filed the current Petition (Paper 2, "Pet.") for *inter partes* review of claims 1, 4, 8, and 9 of U.S. Patent No. 7,202,843 ("the '843 patent") on March 17, 2015. Of the four grounds presented in the Petition, only one ground was instituted. *See* Paper 9 at 12. Specifically, the only instituted challenge raises the question of whether claims 4, 8, and 9 of the '843 patent are anticipated by Korean Patent Application No. 2000-0073673 to Lee ("Lee") (Ex. 1010).

However, the Petition includes a fatal defect in its interpretation of Lee. Both the Petition and the Petition's supporting technical declaration of Richard G. Zech ("Zech") rely on Lee's Fig. 12 for technical interpretation of Lee's disclosure. According to Lee, "an overshoot driving is conducted in a first sub frame $n+$ out of the divided picture frame, and *a driving with the overshoot value rolled back to an originally desired target value* is conducted *in a second sub frame $n-$* ." Lee at 25:10-13 (emphasis added). Zech relies on this disclosure when interpreting Lee's Fig. 12 (an annotated version of which is shown below).

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