

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAMSUNG ELECTRONICS CO., LTD., SAMSUNG DISPLAY CO., LTD;
AND SONY CORPORATION,
Petitioners

v.

SURPASS TECH INNOVATION LLC
Patent Owner

Case IPR2015-00887
Patent 7,420,550

**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, IPR2015-00863
2005	Transcript for the Deposition of Tsu-Jae King Liu dated October 30, 2015, in IPR2015-00887
2006	Transcript for the Deposition of Michael J. Marentic dated November 11, 2015, in IPR2015-00913
2007	Transcript for the Deposition of Richard Zech, Ph.D. dated November 13, 2015, in IPR2015-00885
2008	U.S. Patent No. 3,528,350 to Schmitt
2009	U.S. Patent No. 4,467,325 to Lustig
2010	U.S. Patent No. 4,771,278 to Pooley
2011	U.S. Patent No. RE34,135 to Madsen <i>et al.</i>
2012	U.S. Patent No. 4,894,645 to Odlen
2013	Petition for <i>Inter Partes</i> Review in IPR2015-00022
2014	U.S. Patent No. 6,961,167 to Prins <i>et al.</i>
2015	U.S. Patent No. 5,047,694 to Nuckolls <i>et al.</i>
2016	U.S. Patent No. 5,962,988 to Nuckolls <i>et al.</i>
2017-2022	Reserved
2023	Modern Dictionary of Electronics
2024	Chapter 3. Introduction to Electronics (available at http://users.ece.utexas.edu/~valvano/Volume1/E-Book/C3_Electronics.htm)

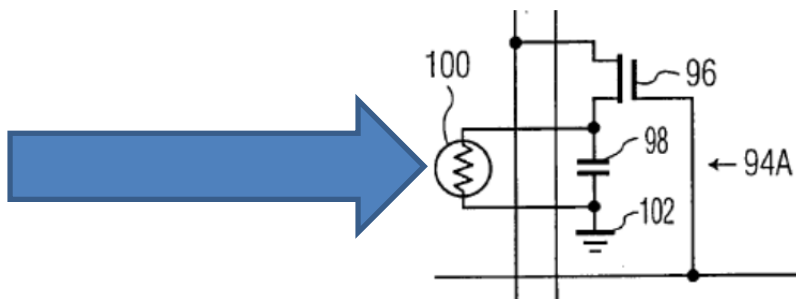
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I. Introduction

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

Samsung Electronics Co., Ltd., Samsung Display Co., Ltd. (collectively, “Samsung”), and Sony Corporation (“Sony”) (Sony and Samsung are collectively referred to as the “Petitioners”) filed the current Petition for *inter partes* review of claims 1-5 of U.S. Patent No. 7,420,550 (“the ‘550 patent”) on March 16, 2015. Of the seven grounds presented in the Petition, four were instituted. *See* Paper 9 at 16-17. Each of these four instituted grounds include obviousness challenges of claims 1-5 of the ‘550 patent, based on primary reference International Publication No. WO 02/075708 to Janssen *et al.* (“Janssen ‘708”). *Id.*

The fatal defect in the Petition is that Janssen ‘708 is not directed to liquid crystal device (“LCD”) display technology at all. Rather, Janssen ‘708 discloses a matrix-style display that includes a lamp symbol in each pixel 100. The representative pixel from Janssen ‘708’s Fig. 3 is shown below:



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