

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

BMW OF NORTH AMERICA, LLC and
BMW MANUFACTURING CO., LLC

Petitioners,

v.

INNOVATIVE DISPLAY TECHNOLOGIES LLC,

Patent Owner.

Case IPR2015-00934

Patent 6,886,956

**INNOVATIVE DISPLAY TECHNOLOGIES LLC'S
MANDATORY NOTICES UNDER 37 C.F.R. 42.8(a)(2)**

Patent Owner, Innovative Display Technologies LLC, hereby files
mandatory notices pursuant to 37 C.F.R. § 42.8(a)(2).

A. Real Party-In-Interest (37 C.F.R. § 42.8 (b)(1))

Innovative Display Technologies LLC is the owner of the entire interest in
U.S. Patent No. 6,886,956 (“the ‘956 Patent”), and thus is a real-party-in-interest.

B. Related Matters (37 C.F.R. § 42.8(b)(2))

The Patent Owner identifies the following judicial and/or administrative matters that may affect, or may be affected by, a decision in this *Inter Partes* Review:

The '956 Patent is asserted by the Patent Owner in the following pending litigations in the U.S. District Court for the Eastern District of Texas: *Innovative Display Technologies LLC v. BMW of North America, LLC and BMW Manufacturing Co., LLC*, Civil Action No. 2:14-cv-106-JRG, filed February 28, 2014; *Innovative Display Technologies LLC v. Toyota Motor Corp. et al.*, Civil Action No. 2:14-cv-200-JRG, filed March 10, 2014; *Innovative Display Technologies LLC v. Nissan Motor Co., Ltd. and Nissan North America, Inc.*, Civil Action No. 2:14-cv-202-JRG, filed March 10, 2014; *Innovative Display Technologies LLC v. American Honda Motor Co., Inc. et al.*, Civil Action No. 2:14-cv-222-JRG, filed March 13, 2014; *Innovative Display Technologies LLC v. Volkswagen AG et al.*, Civil Action No. 2:14-cv-300-JRG, filed April 7, 2014; and *Innovative Display Technologies LLC v. Mercedes-Benz U.S. International, Inc. et al.*, Civil Action No. 2:14-cv-535, filed April 24, 2014.

The '956 Patent is also asserted in the following pending litigations in the U.S. District Court of Delaware: *Innovative Display Technologies LLC v. Ford Motor Company*, Civil Action No. 1:14-cv-849, filed June 30, 2014; and

Innovative Display Technologies LLC v. GM, Civil Action No. 1:14-cv-850, filed June 30, 2014.

Lead and Back-Up Counsel (37 C.F.R. § 42.8(b)(3))

Patent Owner designates the following counsel:

Lead Counsel	Back-Up Counsel
George W. Webb III Registration No. 60,737 (gwebb@azalaw.com) Telephone: 713-655-1101	Amir Alavi Pending <i>Pro Hac Vice</i> Motion (aalavi@azalaw.com) Brian Simmons Pending <i>Pro Hac Vice</i> Motion (bsimmons@azalaw.com)

Address: AHMAD, ZAVITSANOS, ANAIPAKOS, ALAVI
& MENSING P.C.
1221 McKinney, Suite 3460
Houston, TX 77010
(713) 655-1101 (Reception)
(713) 655-0062 (Facsimile)

C. Service Information (37 C.F.R. § 42.8(b)(4))

Please direct all correspondence regarding this proceeding to the counsel at the address listed above. Patent owner also consents to electronic service by email to the e-mail address listed above.

Dated: April 10, 2015

Respectfully Submitted,

By: /s/ George W. Webb III
George W. Webb III
Reg. No. 60,737
Attorney for Patent Owner
Innovative Display Technologies LLC

**AHMAD, ZAVITSANOS, ANAIPAKOS,
ALAVI & MENSING, P.C.**
1221 McKinney Street, Suite 3460
Houston, TX 77010
Telephone: 713-655-1101

CERTIFICATE OF SERVICE

I hereby certify that Innovative Display Technologies LLC's Mandatory Notices Under 37 C.F.R. 42.8(a)(2) were served on this 10th day of April by electronic mail to the following:

Lead Counsel	Back-up Counsel
Jeffrey D. Sanok Reg. No. 32169 CROWELL & MORING LLP 1001 Pennsylvania Avenue NW Washington, DC 20004-2595 Tel.: (202) 624-2500 Fax.: (202) 628-5116 jsanok@crowell.com	Jonathan M. Lindsay Reg. No. 45810 CROWELL & MORING LLP 1001 Pennsylvania Avenue NW Washington, DC 20004-2595 Tel.: (949) 263-8400 Fax.: (949) 263-8414 jlindsay@crowell.com

Dated: April 10, 2015

By: /s/ George W. Webb III
George W. Webb III
Reg. No. 60,737
Attorney for Patent Owner
Innovative Display Technologies LLC

**AHMAD, ZAVITSANOS, ANAIPAKOS,
ALAVI & MENSING, P.C.**
1221 McKinney Street, Suite 3460
Houston, TX 77010
Telephone: 713-655-1101