

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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MERCEDES-BENZ USA, LLC,  
*Petitioner*

v.

INNOVATIVE DISPLAY TECHNOLOGIES LLC,  
*Patent Owner*

Patent No. 7,434,974

Issue Date: October 14, 2008

Title: LIGHT EMITTING PANEL ASSEMBLIES

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**PETITION FOR *INTER PARTES* REVIEW  
OF U.S. PATENT NO. 7,434,974  
PURSUANT TO 35 U.S.C. § 312 and 37 C.F.R. § 42.104**

Case No. IPR2015-01115

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## LISTING OF EXHIBITS

Exhibit 1001	U.S. Patent No. 7,434,974 to Jeffery R. Parker
Exhibit 1002	Japanese Published Patent Application JP H5-45651(U) to Niizuma – Certified English Translation and Japanese Original (“Niizuma”)
Exhibit 1003	Japanese Unexamined Patent Application Publication JP H7-064078A to Kisou et al. – Certified English Translation and Japanese Original (“Kisou”)
Exhibit 1004	Declaration of Thomas L. Credelle (“Credelle Decl.”)

Pursuant to 35 U.S.C. §§ 311–319 and 37 C.F.R. Part 42, Mercedes-Benz USA, LLC (“Petitioner”) respectfully requests *inter partes* review of claims 1, 3, 4, 5, 7, 8, 9, and 13 of U.S. Patent No. 7,434,974 (“the ’974 patent”). According to U.S. Patent and Trademark Office records, the ’974 patent is currently assigned to Innovative Display Technologies LLC (“IDT” or the “Patent Owner”).

## I. MANDATORY NOTICES

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

Pursuant to 37 C.F.R. § 42.8(b)(1), Petitioner provides notice that real parties-in-interest include Petitioner, Mercedes-Benz U.S. International, Inc. (“MBUSI”), Daimler North America Corp. (“DNAC”), and Daimler AG (“DAG”).

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

Pursuant to 37 C.F.R. § 42.8(b)(2), Petitioner provides notice that the ’974 patent is the subject of a patent infringement lawsuit brought by the Patent Owner, against Petitioner in the United States District Court for the Eastern District of Texas: *Innovative Display Technologies LLC v. Mercedes-Benz U.S. International, Inc. and Mercedes-Benz USA, LLC*, Case No. 2:14-cv-535 (“-535 Litigation”), presently consolidated in Lead Case No. 2:14-cv-201. Petitioner and MBUSI were named as defendants in the -535 Litigation and were served with a Summons and Complaint in that action on April 28, 2014 and April 30, 2014, respectively. Neither DNAC nor DAG have been named as a party in litigation concerning the ’974 patent.

The ’974 patent has also been asserted in the actions listed in the chart below.

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