

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

**INNOVATIVE DISPLAY  
TECHNOLOGIES LLC,**

**Plaintiff,**

v.

**FORD MOTOR COMPANY,**

**Defendant.**

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C.A. No. \_\_\_\_\_

**JURY TRIAL DEMANDED**

**PLAINTIFF’S ORIGINAL COMPLAINT**

Plaintiff Innovative Display Technologies LLC, by and through its undersigned counsel, files this Original Complaint for patent infringement against Defendant Ford Motor Company.

**THE PARTIES**

1. Plaintiff Innovative Display Technologies LLC (“IDT”) is a Texas limited liability company with a place of business at 2400 Dallas Parkway, Suite 200, Plano, Texas 75093.

2. Defendant Ford Motor Company (“Ford”) is a Delaware corporation having a principal place of business at 1 American Road, Dearborn, MI 48126. Ford makes and sells automobile brands including Ford and Lincoln.

**JURISDICTION AND VENUE**

3. This action arises under the Patent Laws of the United States, 35 U.S.C. § 271 *et seq.*

4. This Court has subject matter jurisdiction over this case for patent infringement under 28 U.S.C. §§ 1331 and 1338(a).

5. This Court has personal jurisdiction over Ford. Ford is incorporated in the State of Delaware. Additionally, on information and belief, Ford, either directly or through intermediaries, regularly manufactures, imports and sells vehicles, including vehicles with infringing components, intended to be sold and in fact sold into and within this state and this judicial district.

6. Venue is proper in this judicial district under 28 U.S.C. §§ 1391(b) and 1400 (b).

### **PATENTS IN SUIT**

7. U.S. Patent No. 6,755,547 titled “Light Emitting Panel Assemblies” (“the ’547 Patent”) was duly and legally issued by the U.S. Patent & Trademark Office on June 29, 2004, after full and fair examination. Jeffery R. Parker is the named inventor of the ’547 Patent. IDT owns the ’547 Patent and holds the right to sue and recover damages for infringement thereof. A true and correct copy of the ’547 Patent is attached as **Exhibit 1**.

8. U.S. Patent No. 7,300,194 titled “Light Emitting Panel Assemblies” (“the ’194 Patent”) was duly and legally issued by the U.S. Patent & Trademark Office on November 27, 2007, after full and fair examination. Jeffery R. Parker is the named inventor of the ’194 Patent. IDT owns the ’194 Patent and holds the right to sue and recover damages for infringement thereof. A true and correct copy of the ’194 Patent is attached as **Exhibit 2**.

9. U.S. Patent No. 7,384,177 titled “Light Emitting Panel Assemblies” (“the ’177 Patent”) was duly and legally issued by the U.S. Patent & Trademark Office on June 10, 2008,

after full and fair examination. Jeffery R. Parker is the named inventor of the '177 Patent. IDT owns the '177 Patent and holds the right to sue and recover damages for infringement thereof. A true and correct copy of the '177 Patent is attached as **Exhibit 3**.

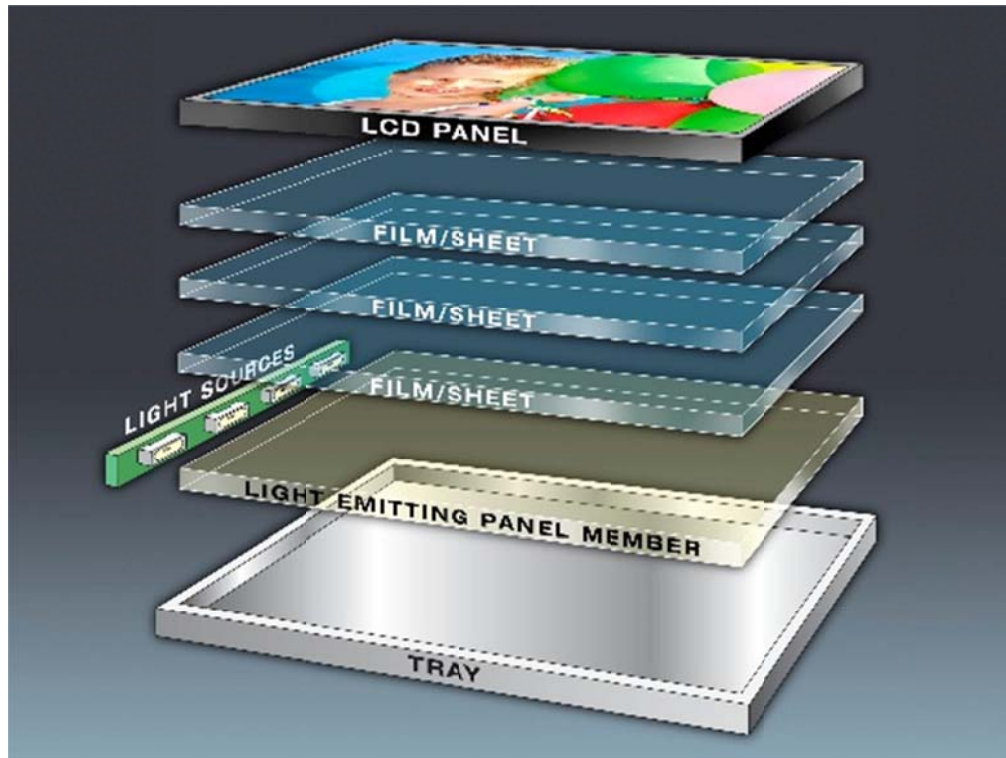
10. U.S. Patent No. 7,404,660 titled "Light Emitting Panel Assemblies" ("the '660 Patent") was duly and legally issued by the U.S. Patent & Trademark Office on July 29, 2008, after full and fair examination. Jeffery R. Parker is the named inventor of the '660 Patent. IDT owns the '660 Patent and holds the right to sue and recover damages for infringement thereof. A true and correct copy of the '660 Patent is attached as **Exhibit 4**.

11. U.S. Patent No. 7,434,974 titled "Light Emitting Panel Assemblies" ("the '974 Patent") was duly and legally issued by the U.S. Patent & Trademark Office on October 14, 2008, after full and fair examination. Jeffery R. Parker is the named inventor of the '974 Patent. IDT owns the '974 Patent and holds the right to sue and recover damages for infringement thereof. A true and correct copy of the '974 Patent is attached as **Exhibit 5**.

12. U.S. Patent No. 8,215,816 titled "Light Emitting Panel Assemblies" ("the '816 Patent") was duly and legally issued by the U.S. Patent & Trademark Office on July 10, 2012, after full and fair examination. Jeffery R. Parker is the named inventor of the '816 Patent. IDT owns the '816 Patent and holds the right to sue and recover damages for infringement thereof. A true and correct copy of the '816 Patent is attached as **Exhibit 6**.

13. The '547, '194, '177, '660, '974 and '816 patents relate to back-lighting assemblies as used in LCD display units. A typical LCD display unit includes a liquid crystal display, behind which is a panel assembly for back-lighting the LCD. Elements of the back-lighting assembly include a light-conducting panel that acts as a light guide; light sources located

around the perimeter of the panel; optical sheets or films placed between the light-conducting panel and the LCD screen; and a tray or housing for the assembly. Light enters the panel from a light source or sources located on the perimeter of the panel. Optical elements within the panel cause the light to be emitted outward from the panel toward and through the LCD screen overlying the panel. For illustration only, a simplified abstract representation is provided below:



14. As further detailed below, the inventions of the '547, '194, '177, '660, '974 and '816 patents are directed to several different light emitting panel assembly configurations which provide for better distribution of the light output from the panel assembly and more efficient utilization of light.

15. U.S. Patent No. 6,886,956 titled "Light Emitting Panel Assemblies for Use in Automotive Applications and the Like" ("the '956 Patent") was duly and legally issued by the U.S. Patent & Trademark Office on May 3, 2005, after full and fair examination. Jeffery R.

Parker, Mark D. Miller and Thomas A. Hough are the named inventors of the '956 Patent. IDT owns the '956 Patent and holds the right to sue and recover damages for infringement thereof. A true and correct copy of the '956 Patent is attached as **Exhibit 7**.

16. The '956 Patent relates to light-emitting assemblies used in exterior components of automobiles, such as head lights and tail lights.

17. As further detailed below, the invention of the '956 Patent is directed to a light-emitting assembly that includes a light guide which receives light from an LED at one end. The light guide contains optical elements that cause the light to be directed outward through the side of the light guide in a desired manner, thereby illuminating a portion of the head light or tail light.

**COUNT 1: Infringement of U.S. Patent No. 6,755,547**

18. Plaintiff repeats and re-alleges each and every allegation of paragraphs 1-17 as though fully set forth herein.

19. On information and belief, LCD navigation display units found in Ford automobiles practice one or more claims of the '547 Patent. In particular, infringing Ford LCD navigation display units include a light emitting assembly containing 1) a light emitting member having a light emitting area emitting light that is internally reflected, 2) a transparent sheet or film overlying the light emitting area with an air gap in between, 3) a pattern of deformities on one side of the sheet or film whose width and length are much smaller than the sheet or film. Furthermore, the deformities vary at different locations on the sheet or film to direct light from the light emitting member in different directions to produce a desired light output distribution,

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