

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

<b>INNOVATIVE DISPLAY TECHNOLOGIES LLC,</b>	§	
<b>Plaintiff,</b>	§	<b>Civil Action No. 14-849-RGA</b>
v.	§	<b>JURY TRIAL DEMANDED</b>
<b>FORD MOTOR COMPANY,</b>	§	
<b>Defendant.</b>	§	

<b>INNOVATIVE DISPLAY TECHNOLOGIES LLC,</b>	§	
<b>Plaintiff,</b>	§	<b>Civil Action No. 14-850-RGA</b>
v.	§	<b>JURY TRIAL DEMANDED</b>
<b>GENERAL MOTORS LLC,</b>	§	
<b>Defendant.</b>	§	

**JOINT CLAIM CONSTRUCTION CHART**

Pursuant to paragraph 8(c) of the Court’s Scheduling Order of November 10, 2014, Plaintiff Innovative Display Technologies LLC (“IDT”) and Defendants Ford Motor Company (“Ford”) and General Motors LLC (“GM”) (collectively the “Parties”) submit this Joint Claim Construction Chart of terms and phrases from U.S. Patent No. 6,886,956 (“the ‘956 Patent”) for construction in the above-captioned cases.

**A. AGREED CONSTRUCTION**

The following construction has been agreed by the Parties:

<b>’956 Patent Term or Phrase</b>	<b>Agreed Construction</b>
“light extracting deformities”  (claim 1)	“any change in the shape or geometry of a surface and/or coating or surface treatment that causes a portion of the light to be emitted”

**B. DISPUTED CONSTRUCTIONS**

The Parties submit the following proposed constructions for other terms and phrases. The Exhibits cited in this chart are described more fully in part C of this submission. In addition to the intrinsic evidence indicated in this chart, each Party reserves the right to rely on evidence cited by any other Party.

<b>'956 Patent Term or Phrase</b>	<b>IDT's Proposed Construction and Intrinsic Evidence</b>	<b>Ford's Proposed Construction and Intrinsic Evidence</b>	<b>GM's Proposed Construction and Intrinsic Evidence</b>
<p>“one or more light emitting diodes along said light input surface for receiving light from said light emitting diodes and conducting the light from said edge for emission of the light from at least one of said sides”</p> <p>(claim 1)</p>	<p>Not indefinite. However, should the Court determine that construction is needed, IDT proposes:</p> <p>“one or more light emitting diodes along said light input surface, wherein said light input surface receives light from said light emitting diodes and said light guide conducts the light from said edge for emission of the light from at least one of said sides”</p> <p><b><u>Intrinsic Evidence</u></b></p> <p><b>Exhibit A ('956 patent) at:</b> Figs. 3-4 2:10-13 4:51 – 5:17 8:51 – 9:22</p> <p><b>Exhibit E at:</b> Reply to Office Action p. 2 (IDTFH00000441) <i>Id.</i> pp. 8-9 (IDTFH00000447 to -448)</p> <p><b>Exhibit F:</b> Notice of Allowability p. 3 (IDTFH00000534)</p> <p><b>Exhibit J (Pristash) a:</b> Figs. 11-14 6:20-53</p>		<p>Indefinite under 35 U.S.C. § 112 ¶ 2.</p> <p><b><u>Intrinsic Evidence:</u></b></p> <p><b>Exh. A ('956 patent) at:</b> Col. 1:27:32 Col. 2:10-20 Col. 4:51- Col. 5:24 Col. 9:23-34 Figs. 1-5 and 7</p> <p><b>Exh. D:</b> <i>See e.g.</i>, February 12, 2004 Office Action at pages 1 – 4 [IDTFH00000397-400], and June 11, 2004 Reply to Office Action of February 12, 2004 [IDTFH00000418-427]; cited reference <b>Exh. K</b></p> <p><b>Exh. E:</b> <i>See e.g.</i>, June 29, 2004 Office Action at pages 2 – 5 [IDTFH00000432-435], and Sept. 29, 2004 Reply to Office Action of June 29, 2004 [IDTFH00000440-450]; cited reference <b>Exh. L</b></p>

'956 Patent Term or Phrase	IDT's Proposed Construction and Intrinsic Evidence	Ford's Proposed Construction and Intrinsic Evidence	GM's Proposed Construction and Intrinsic Evidence
<p>“having shapes for controlling an output ray angle distribution of emitted light to suit a particular application”  (claim 1)</p>	<p>Plain meaning.</p> <p><b><u>Intrinsic Evidence</u></b></p> <p><b>Exhibit A ('956 patent) at:</b> Figs. 1-4, 8-10 1:24-32 1:64 – 2:9 4:51-65 5:38 – 7:15 8:30 – 9:45 10:27 – 11:9 Claims 8, 14, 16, 26</p> <p><b>Exhibit D at:</b> Detailed Action pp. 2-4 (IDTFH00000398 to -400)</p> <p><b>Exhibit E at:</b> Detailed Action pp. 3-5 (IDTFH00000433 to -435)</p> <p><b>Exhibit I (Blazina) at:</b> 4:7-27 6:10-21 8:30 – 9:21 10:5-22 11:3 – 12:6 12:24 – 32 Figs. 1 – 4(b)</p> <p><b>Exhibit J (Pristash) at:</b> Fig. 1 1:30-37 2:39-48 4:23-56 6:20-53</p> <p><b>Exhibit K (Nakamura) at:</b> Figs. 3 – 8(b) <i>Passim</i></p> <p><b>Exhibit L (Serizawa) at:</b> Figs. 2, 4, 10-11 4:19-26</p>	<p>Indefinite under 35 U.S.C. § 112 ¶ 2.</p> <p><b><u>Intrinsic Evidence</u></b></p> <p><b>Exhibit A ('956 patent) at:</b> Claim 1 1:35-2:9 6:23-30 6:44-54 7:42-50 8:30-9:12 9:22-45 10:28-34 Fig. 3 Fig. 4 Fig. 8</p> <p><b>Exhibit E at:</b> Reply to Office Action pp. 9-10. (IDTFH00000448-449)</p>	

'956 Patent Term or Phrase	IDT's Proposed Construction and Intrinsic Evidence	Ford's Proposed Construction and Intrinsic Evidence	GM's Proposed Construction and Intrinsic Evidence
	4:64 – 5:6 8:67 – 9:30 9:49 – 10:2 10:49-59		
<p>“substrate”  (claims 1, 4, 5, 31)</p>	<p>Plain meaning.</p> <p><b><u>Intrinsic Evidence</u></b></p> <p><b>Exhibit A ('956 patent) at:</b> Figs. 3-4 8:38-50 9:8-12 Claims 2-5, 13-16, 18-23, 26, 29, 31</p> <p><b>Exhibit D at:</b> Detailed Action pp. 2-3 (IDTFH00000398 to -399)</p> <p><b>Exhibit E at:</b> Detailed Action pp. 3-4 (IDTFH00000433 to -434) Reply to Office Action p. 8 (IDTFH00000447)</p> <p><b>Exhibit J (Pristash) at:</b> Fig.7 5:22-33</p> <p><b>Exhibit K (Nakamura) at:</b> Fig. 1-4, 6, 8(a)-(b) 1:36-57 3:1-37 4:57 – 5:5 5:23-31</p> <p><b>Exhibit L (Serizawa) at:</b> Figs. 2, 4, 6-8, 11 6:39-49 7:55-65 8:22-32 9:4-16 10:8-25</p>		<p>“a layer that underlies something such as a deformity or disruption, and that contacts a light guide”</p> <p><b><u>Intrinsic Evidence</u></b></p> <p>The term “substrate” does not appear in the abstract or specification of the '956 patent.</p> <p><b>Exh. A ('956 patent) at:</b> Claim 2 Claim 18 Col. 5:61-67 Col. 7:37-41 Figure 4 and Col. 9:8-12</p> <p><b>Exh. D:</b> <i>See e.g.</i>, February 12, 2004 Office Action at pages 1 – 4 [IDTFH00000397-400], and June 11, 2004 Reply to Office Action of February 12, 2004 [IDTFH00000418-427]; cited reference <b>Exh. K</b></p> <p><b>Exh. E:</b> <i>See e.g.</i>, June 29, 2004 Office Action at pages 2 – 5 [IDTFH00000432-435], and Sept. 29, 2004 Reply to Office Action of June 29, 2004 [IDTFH00000440-450]; cited reference <b>Exh. L</b></p>

'956 Patent Term or Phrase	IDT's Proposed Construction and Intrinsic Evidence	Ford's Proposed Construction and Intrinsic Evidence	GM's Proposed Construction and Intrinsic Evidence
<p>“overlying at least one of said sides”</p> <p>(claim 1)</p>	<p>Plain meaning.</p> <p><b><u>Intrinsic Evidence</u></b></p> <p><b>Exhibit A ('956 patent) at:</b>  Figs. 1-4, 12-19  2:66 – 3:15  7:16-50  8:30 – 9:12  11:21 – 12:51  Claim 3- 4, 15, 21, 31</p> <p><b>Exhibit D at:</b>  Detailed Action p. 2  (IDTFH00000398)</p> <p><b>Exhibit E at:</b>  Detailed Action pp. 3-4  (IDTFH00000433 to -434)</p> <p><b>Exhibit J (Pristash) at:</b>  Fig. 7  5:22-33</p> <p><b>Exhibit K (Nakamura) at:</b>  Figs. 1-2  3:1-37  4:57 – 5:5</p> <p><b>Exhibit L (Serizawa) at:</b>  Figs. 4, 6-7  10:8-15</p>	<p>“attached to or positioned against one or more of the sides”</p> <p><b><u>Intrinsic Evidence</u></b></p> <p><b>Exhibit A ('956 patent) at:</b>  Claim 1  Claim 3  Claim 4  5:53-67  7:30-50  9:8-12  Fig. 4</p>	
<p>“attached to a circuit”</p> <p>(claim 9)</p>	<p>Plain meaning.</p> <p><b><u>Intrinsic Evidence</u></b></p> <p><b>Exhibit A ('956 patent) at:</b>  Figs. 2, 6-10, 12  8:9-16  9:46 – 11-9  11:49-60</p>	<p>“electrically coupled to a network of circuit elements such as resistors, inductors, capacitors, and semiconductors”</p> <p><b><u>Intrinsic Evidence:</u></b></p> <p><b>Exhibit A ('956 patent) at:</b></p>	

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