

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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FORD MOTOR COMPANY  
Petitioner

v.

INNOVATIVE DISPLAY TECHNOLOGIES LLC  
Patent Owner

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Case No. TBD  
U.S. Patent No. 6,886,956

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**PETITION FOR *INTER PARTES* REVIEW  
OF U.S. PATENT NO. 6,886,956**

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            (a) “light extracting deformities” means “any change in the shape or  
            geometry of the panel surface and/or coating or surface treatment that causes  
            a portion of the light to be emitted” ..... 7

            (b) “overlying at least one of said sides” means “attached to or positioned  
            against one or more of the sides” ..... 8

            (c) “attached to a circuit” means “electrically coupled to a network of  
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## I. INTRODUCTION

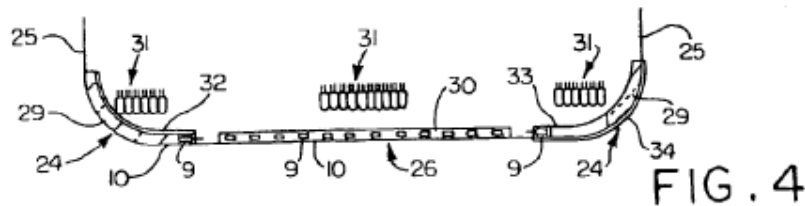
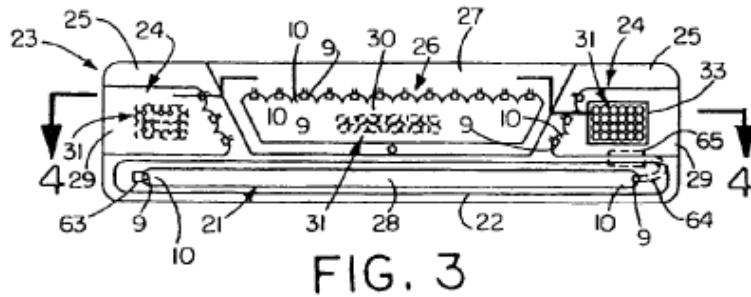
Petitioner Ford Motor Company (“Petitioner”) requests an *Inter Partes* Review (“IPR”) of claims 1, 4-6, 9, and 31 (collectively, the “Challenged Claims”) of U.S. Patent No. 6,886,956 (“the ‘956 Patent”) issued on May 3, 2005 to Jeffrey R. Parker, et al. (“Applicants”). **Exhibit 1001**, ‘956 Patent. As demonstrated by Petitioner below, the purportedly patentable feature of the ‘956 Patent of a light emitting assembly for vehicle illumination with a light guide, light emitting diodes (LEDs), and a substrate providing an exterior portion of a vehicle was present in the prior art. This concept was also not new when considered in light of the state of the art of vehicle illumination assemblies at the time. *See*, **Ex. 1005**, *York Declaration* at ¶ 41.

## II. SUMMARY OF THE ‘956 PATENT

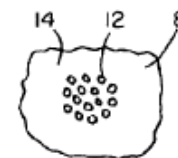
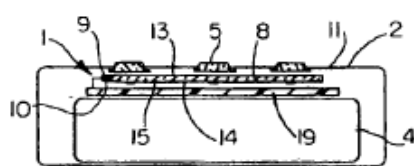
### A. Description of the Alleged Invention of the ‘956 Patent

The ‘956 Patent is generally directed to a light emitting panel assembly including a light guide for use in automobile applications. *See* **Ex. 1001** at 1:35-46. For example, as shown in Figs. 3 and 4 below, the alleged invention described in the ‘956 Patent includes transparent light emitting panel members 28-30 with one or more light transition areas 10 at one or both ends. *See* **Ex. 1001** at Figs. 3, 4; 8:30-63. Light sources 9 are mounted within the light transition areas 10. *See* **Ex. 1001** at Figs. 3, 4; 8:30-63. The light from the light sources 9 enters the transparent light emitting panel members 28-30 from the light transition areas 10

and is “emitted along the entire length of the panel members or from one or more light output surface areas along their length... to produce a desired light output distribution to fit a particular application.” **Ex. 1001** at 4:59-65.



The panel members 28-30 may also have a pattern of light extracting deformities or disruptions 12 (see Fig. 2A below) on one or both sides 13, 14 (as show in Fig. 2). **Ex. 1001** at 5:38-41.



The pattern of deformities may include a variable pattern which breaks up the light rays such that the internal angle of reflection of a portion of the light rays

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