UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BORAD

FORD MOTOR COMPANY. Petitioner,

v.

INNOVATIVE DISPLAY TECHNOLOGIES, LLC, Patent Owner.

Case IPR2015-01540 Patent No. 6,886,956

PATENT OWNER'S WAIVER OF PRELIMINARY RESPONSE TO PETITION FOR *INTER PARTES* REVIEW OF U.S. PATENT NO. 6,886,956 PURSUANT TO 37 C. F. R. § 42.107(b)

Innovative Display Technologies LLC ("IDT") waives its right, pursuant to 37 C.F.R. § 42.107(b), to present a preliminary response. As indicated in the Trial Practice Guide, no adverse inference should be taken by this election. *See* Office Patent Trial Practice Guide, Fed. Reg. Vol. 77, No. 157 (2012) at Section II.C. IDT reserves all rights to submit a Patent Owner Response and/or Amendment of the Patent pursuant to 37 C.F.R. §§ 42.120 and 42.121, respectively, should the



PATENT OWNER'S WAIVER OF PRELIMINARY RESPONSE IPR2015-01540

Board institute an *inter partes* review. This election should not be deemed a waiver or admission on the part of IDT of any material presented in the Petition.

Respectfully submitted,

Dated: October 14, 2015 By: /s/ George W. Webb III

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CERTIFICATE OF SERVICE

I hereby certify that Patent Owner's Waiver Of Preliminary Response To Petition For *Inter Partes* Review of U.S. Patent No. 6,886,956 Pursuant To 37 C.F.R. § 42.107(b) was served on 14th day of October by electronic mail to the following:

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