

Filed on behalf of Innovative Display Technologies LLC
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UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

K.J. PRETECH CO., LTD.
Petitioner,

v.

INNOVATIVE DISPLAY TECHNOLOGIES LLC,
Patent Owner.

Case IPR2015-01867
U.S. Patent No. 7,537,370

DECLARATION OF KENNETH WERNER

Mail Stop PATENT BOARD
Patent Trial and Appeal Board
U.S. Patent & Trademark Office
P.O. Box 1450

Petition for Inter Partes Review of U.S. Patent No. 7,537,370

Declaration of Kenneth Werner

I, Kenneth Werner, do hereby declare and state, that all statements made herein of my own knowledge are true and that all statements made on information and belief are believed to be true; and further that these statements were made with the knowledge that willful false statements and the like so made are punishable by fine or imprisonment, or both, under Section 1001 of Title 18 of the United States Code.

Executed July 1, 2016, in Norwalk, Connecticut, United States of America.



Mr. Kenneth Werner

I. INTRODUCTION

1. The facts set forth below are known to me personally and I have firsthand knowledge of them. I am a United States citizen over eighteen years of age. I am fully competent to testify on the matters in this Declaration. I understand that this Declaration is being submitted along with the Patent Owner's response to the Decision in the Institution of Inter Partes Review ("IPR") by the Patent Trial and Appeal Board ("Board") for U.S. Patent No. 7,537,370 (or, the "'370 patent") in IPR2015-01867.

A. Engagement

2. I have been hired as a technical expert by the owner of the '370 patent to study it and certain prior art and provide my opinions on whether that prior art discloses the limitations of the claims of the '370 patent at issue in this IPR proceeding. In particular, I have been asked to review the Declaration of Thomas L. Credelle ("Credelle Declaration") and provide my opinions about that declaration. Further, I have read the Institution Decision and understand that the Board has only instituted this IPR on two grounds: whether claim 29 of the '370 patent is obvious in light of JP H03-189679 ("Suzuki") and whether claim 47 of the '370 patent is obvious in light of Suzuki and US 5,005,108 ("Pristash").

B. Background and Qualifications

3. In this section, I discuss my educational background, work experience, and other relevant qualifications. My curriculum vitae is attached as Appendix A,

which also includes a list of all other cases in which I have testified as an expert at trial or by deposition.

4. I have over twenty-seven years of experience in the electronic display industry. I am currently founder and Principal of Nutmeg Consultants. In my current role I regularly address technical and trade organizations in the Americas and Asia, and I am routinely consulted by financial advisors, analysts, attorneys, members of the international press corps, and by companies entering or repositioning themselves in the display industry. I speak frequently with senior executives of large, mid-sized, and small display-related companies in Asia, Europe, and the Americas, as well as government officials and academic researchers. At BRDisplay II (July 2004, Recife, Brazil), I served as a consultant to the working groups developing a national strategy for the growth of a display-related industry in Brazil and wrote the introduction to their report.

5. I also serve as Senior Analyst for Meko, Ltd. Until recently I served as Marketing Director for Tannas Displays (Orange, California). In that position, I did extensive research on markets for custom-sized and bar-type displays, particularly for signage applications. I am a founding co-editor of MEKO's Display Daily, and a regular contributor to HDTVexpert.com.

6. I began my career as a semiconductor device design engineer for RCA. I hold a B.A. in physics from Rutgers University and an M.S. in solid-state physics

from the University of North Carolina at Chapel Hill. And I have taken graduate management courses at the University of Connecticut.

7. I have been an active participant in the display industry since 1987. From 1987-2005, I was the Editor of Information Display Magazine. I have given keynote presentations at LCD/PDP International 2001 (Yokohama, Japan), InfoDisplay VI (2003, Fortaleza, Brazil), and invited presentations at the Consumer Electronics Show 2002 (Las Vegas), the International Display Manufacturing Conference 2002 (Seoul), the Liquid Crystal Institute (2002, Kent, Ohio), IMID 2005 (Seoul), the Signage and Graphics Summit (2007, Tucson), LatinDisplay 2007 and 2008 (Campinas, Brazil), LatinDisplay 2009 (Sao Paulo), and Technologies for Custom Display Modules (SID-LA, 2010). I was a referee for the Display Invention Competition held in August 2003 in Korolev, Russia.

8. Recently, I have delivered invited papers at CVCE 2010 (Asan, Korea); LatinDisplay 2010 (Sao Paulo, Brazil); and Organic Displays, Lighting, and Electronics (SID-LA, 2011). I delivered keynote addresses on OLED displays at the Nomura Pan-Asia Technology Forum (2011 and 2012, Hong Kong) and an invited presentation on 3D displays at Display Taiwan (June 2011, Taipei). I delivered a presentation on OLED displays at CVCE 2012 (Sept. 2012, Cheonan, Korea), one on Internet TV at LatinDisplay/IDRC (Nov. 2012, Sao Paulo), and one on

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