

UNITED STATES PATENT AND TRADEMARK OFFICE

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**BEFORE THE PATENT TRIAL AND APPEAL BOARD**

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K.J. PRETECH CO., LTD.  
Petitioner

v.

INNOVATIVE DISPLAY TECHNOLOGIES LLC  
Patent Owner

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**Case: IPR2015-01867**

**Patent 7,537,370**

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**PETITION FOR *INTER PARTES* REVIEW  
OF U.S. PATENT NO. 7,537,370**

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**PETITIONERS' EXHIBIT LIST**

Description	Exhibit #
U.S. Patent No. 7,537,370	1001
Prosecution History of U.S. Patent No. 7,537,370	1002
Complaints filed in Related District Court Cases	1003
Declaration of Credelle (“Credelle Decl.”)	1004
U.S. Patent No. 5,461,547 (“Ciupke”)	1005
U.S. Patent No. 5,408,388 (“Kobayashi”)	1006
U.S. Patent No. 5,005,108 (“Pristash”)	1007
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U.S. Patent No. 4,929,866 (“Murata”)	1011
Claim Construction Order, <i>Innovative Display Technologies LLC v. Acer, Inc., et al.</i> , No. 2:13-cv-00522 (E.D. Tex. Aug. 26, 2014), ECF No. 101	1012
Plaintiff's Opening Claim Construction Brief, <i>Innovative Display Technologies LLC v. Acer, Inc., et al.</i> , No. 2:13-cv-00522 (E.D. Tex. June 16, 2014), ECF No. 69	1013
U.S. Patent No. 5,160,195 (“Miller”)	1014
J. A. Castellano, <i>Handbook of Display Technology</i> , Academic Press Inc., San Diego (1992)	1015
U.S. Patent No. 5,598,280 (“Nishio”)	1016
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U.S. Patent No. 5,303,322 (“Winston”)	1018
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Pursuant to 35 U.S.C. § 311, Petitioner hereby respectfully requests *inter partes* review of claims 1, 4-6, 9, 13, 29, and 47 of Ex. 1001, U.S. Patent No. 7,537,370 (“the ’370 Patent”) (“Ex. 1001”) which issued on May 26, 2009. The challenged claims are unpatentable under 35 U.S.C. § 103 over the prior art publications identified and applied in this Petition.

**I. MANDATORY NOTICES**

Pursuant to 37 C.F.R. § 42.8, Petitioner provides the following mandatory disclosures:

A. Real Parties-In-Interest. There are no real parties-in-interest with Petitioner K.J. Pretech Co., Ltd.

B. Related Matters. Pursuant to 37 C.F.R. § 42.8(b)(2), Petitioner submits that the ’370 Patent is the subject of patent infringement lawsuits brought by the Patent Owner, Innovative Display Technologies LLC (*see* Ex. 1003), and an IPR brought by LG Display Co. Ltd., which are listed in the chart below.

Description	Docket Number
<i>DDG and IDT v. Lenovo Group Ltd., et al.</i>	1:13-cv-02108, D.Del.
<i>DDG and IDT v. LG Electronics Inc., et al.</i>	1:13-cv-02109, D.Del.
<i>DDG and IDT v. Vizio, Inc.</i>	1:13-cv-02112, D.Del.
<i>LG Display Co. Ltd, v. Innovative Display Technologies, Ltd.</i>	IPR2014-01096

Petitioner is concurrently filing petitions to review U.S. Patent Nos.

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