

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

**PATENT OWNER'S MANDATORY NOTICES PURSUANT TO
37 C.F.R. §§ 42.8(a)(2) and 42.8(b)**

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Patent Owner Innovative Display Technologies (“IDT”) hereby files its mandatory notices pursuant to 37 C.F.R. §§ 42.8(a)(2) and 42.8(b):

A. Section 42.8(b)(1) – Real Party-In-Interest

Patent Owner identifies Acacia Research Group LLC and Acacia Research Corporation as its real parties-in-interest.

B. Section 42.8(b)(2) – Related Matters

Patent Owner has alleged infringement of the patent at issue in this *inter partes* review in the following matters:

1. *Delaware Display Group LLC et al. v. LG Electronics Inc. et al.*, No. 1:13-cv-02109 (D. Del., filed Dec. 31, 2013)
2. *Innovative Display Technologies LLC v. Acer Inc., et al.*, No. 2:13-cv-00522 (E.D. Tex., filed June 28, 2013);
3. *Innovative Display Technologies LLC v. Dell Inc.*, No. 2:13-cv-00523 (E.D. Tex., filed June 28, 2013);
4. *Innovative Display Technologies LLC v. Hewlett-Packard Company*, No. 2:13-cv-00524 (E.D. Tex., filed June 28, 2013);
5. *Innovative Display Technologies LLC v. Huawei Investment and Holding Co., Ltd. et al.*, No. 2:13-cv-00525 (E.D. Tex., filed June 28, 2013);
6. *Innovative Display Technologies LLC v. Blackberry Ltd. et al.*, No. 2:13-cv-00526 (E.D. Tex., filed June 28, 2013);

7. *Innovative Display Technologies LLC v. ZTE Corporation et al.*, No. 2:13-cv-00527 (E.D. Tex., filed June 28, 2013);
8. *Innovative Display Technologies LLC v. Microsoft Corp.*, No. 2:13-cv-00783 (E.D. Tex., filed Oct. 1, 2013);
9. *Innovative Display Technologies LLC v. Nokia Corp. et al.*, No. 2:13-cv-00784 (E.D. Tex., filed Oct. 1, 2013);
10. *Innovative Display Technologies LLC v. Apple Inc.*, No. 2:14-cv-00030 (E.D. Tex., filed Jan. 17, 2014);
11. *Innovative Display Technologies LLC v. BMW of North America, LLC et al.*, No. 2:14-cv-00106 (E.D. Tex., filed Feb. 21, 2014);
12. *Innovative Display Technologies LLC v. Canon U.S.A. Inc. et al.*, No. 2:14-cv-00142 (E.D. Tex., filed Feb. 26, 2014);
13. *Innovative Display Technologies LLC v. MiTAC Digital Corporation et al.*, No. 2:14-cv-00144 (E.D. Tex., filed Feb. 26, 2014);
14. *Innovative Display Technologies LLC v. Nikon, Inc. et al.*, No. 2:14-cv-00145 (E.D. Tex., filed Feb. 27, 2014);
15. *Innovative Display Technologies LLC v. TomTom North America Inc. et al.*, No. 2:14-cv-00146 (E.D. Tex., filed Feb. 27, 2014);
16. *Innovative Display Technologies LLC v. Nissan Motor Co., Ltd. et al.*, No. 2:14-cv-00202 (E.D. Tex., filed Mar. 10, 2014);

17. *Innovative Display Technologies LLC et al. v. Apple Inc.*, No. 2:14-cv-00301 (E.D. Tex., filed Apr. 8, 2014);
18. *Innovative Display Technologies LLC v. Google Inc., et al.*, No. 2:14-cv-00302 (E.D. Tex., filed Apr. 8, 2014);
19. *Innovative Display Technologies LLC et al. v. AT&T Inc. et al.*, No. 2:14-cv-00720 (E.D. Tex., filed June 25, 2014);
20. *Innovative Display Technologies LLC et al. v. Sprint Corporation et al.*, No. 2:14-cv-00721 (E.D. Tex., filed June 25, 2014);
21. *Delaware Display Group LLC et al. v. Amazon.com Inc.*, No. 1:13-cv-02106 (D. Del., filed Dec. 31, 2013);
22. *Delaware Display Group LLC et al. v. HTC Corporation et al.*, No. 1:13-cv-02107 (D. Del., filed Dec. 31, 2013);
23. *Delaware Display Group LLC et al. v. Lenovo Holding Company Inc. et al.*, No. 1:13-cv-02108 (D. Del., filed Dec. 31, 2013);
24. *Delaware Display Group LLC et al. v. Pantech Co. Ltd. et al.*, No. 1:13-cv-02110 (D. Del., filed Dec. 31, 2013);
25. *Delaware Display Group LLC et al. v. Sony Corp. et al.*, No. 1:13-cv-02111 (D. Del., filed Dec. 31, 2013);
26. *Delaware Display Group LLC et al. v. VIZIO Inc. et al.*, No. 1:13-cv-02112 (D. Del., filed Dec. 31, 2013);

There are 13 other active requests for *inter partes* review for patents related to the patent at issue in this proceeding. Those IPRs are as follows:

- IPR2014-01096 joined with IPR2015-00493 (U.S. Patent No. 7,537,370);
- IPR2014-01097 joined with IPR2015-00360 and IPR2015-00490 (U.S. Patent No. 7,300,194);
- IPR2014-01362 joined with IPR2015-00489 (U.S. Patent No. 7,384,177);
- IPR2015-00487 (U.S. Patent No. 7,404,660)
- IPR2015-00506 (U.S. Patent No. 7,434,973);
- IPR2015-01666 (U.S. Patent No. 7,434,973);
- IPR2015-01717 (U.S. Patent No. 7,404,660);
- IPR2015-01866 (U.S. Patent No. 8,215,816); and
- IPR2015-01868 (U.S. Patent No. 7,434,974).

C. Section 42.8(b)(3) – Lead and Back-Up Counsel

Patent Owner identifies the following lead and back-up counsel:

Lead Counsel:

Justin B. Kimble (Reg. No. 58,591)
(Phone No. 214.785.6673)

Back-Up Counsel:

Jeffrey R. Bragalone (*pro hac vice* to be filed)
(Phone No. 214.785.6671)

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