

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

***PRO HAC VICE* MOTION TO ADMIT ATTORNEY JEFFREY R.
BRAGALONE PURSUANT TO 37 C.F.R. § 42.10(c)**

EXHIBIT 2010: DECLARATION OF JEFFREY R. BRAGALONE

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P.O. Box 1450

I, Jeffrey R. Bragalone, make the following declaration based on my own personal knowledge and, if called to testify before the court, could and would testify as follows:

1. I am a shareholder with the law firm of Bragalone Conroy, P.C., located at 2200 Ross Avenue, Suite 4500-West, Dallas, TX 75201.
2. I am a member in good standing of the Texas State Bar.
3. I have never been subject to any suspensions or disbarments from practice before any court or administrative body.
4. None of my applications for admission to practice before any court or administrative body has ever been denied.
5. I have never been sanctioned nor had contempt citations imposed by any court or administrative body.
6. I have read and will comply with the Office Patent Trial Practice Guide and the Board's Rules of Practice for Trials set forth in part 42 of 37 C.F.R.
7. I will be subject to the USPTO Rules of Professional Conduct set forth in 37 C.F.R. §§ 11.101 *et. seq.* and disciplinary jurisdiction under 37 C.F.R. § 11.19(a).
8. During the past three years, I have applied to appear *pro hac vice* before the PTAB in twenty-five other proceedings, twenty-one of which have

been granted, two of which involved IPRs that were joined with those for which my *pro hac vice* motion had been already granted, and the remainder of which remain pending. Fourteen of the *pro hac vice* motions involve the same or related patents as this proceeding and also involve the same or similar subject matter:

- i. IPR2014-01092 (*granted*);
- ii. IPR2014-01094 (*granted*);
- iii. IPR2014-01095 (*granted*);
- iv. IPR2014-01096 (*granted*);
- v. IPR2014-01097 (*granted*);
- vi. IPR2014-01357 (*granted*);
- vii. IPR2014-01359 (*granted*);
- viii. IPR2014-01362 (*granted*);
- ix. IPR2015-00487 (*granted*);
- x. IPR2015-00506 (*granted*);
- xi. IPR2015-01666 (*joined with IPR2015-00506 above*);
- xii. IPR2015-01717 (*joined with IPR2015-00487 above*);
- xiii. IPR2015-01866 (*pending, filed concurrently herewith*); and
- xiv. IPR2015-01868 (*pending, filed concurrently herewith*).

The remaining eleven *pro hac vice* motions involve eleven other IPRs all unrelated to this petition:

- xv. CBM2014-00166 (*granted*);
- xvi. IPR2014-00785 (*granted*);
- xvii. IPR2014-00810 (*granted*);
- xviii. IPR2014-00824 (*granted*);
- xix. IPR2014-00825 (*granted*);
- xx. IPR2014-01278 (*granted*);
- xxi. IPR2014-01282 (*granted*);
- xxii. IPR2014-01283 (*granted*);
- xxiii. IPR2015-00153 (*granted*);
- xxiv. IPR2015-00155 (*granted*); and
- xxv. IPR2015-00156 (*granted*).

I have not applied to appear *pro hac vice* in any other proceeding before the PTAB.

9. I have familiarity with the subject matter at issue in this proceeding. I currently represent Patent Owner Innovative Display Technologies LLC, in its assertion of U.S. Patent No. 7,537,370 (the patent at issue in this petition) and its related patents in numerous cases resolved in the Eastern District of Texas and pending in the District of Delaware. *See*,

e.g., Delaware Display Group LLC et al. v. LG Electronics, Inc. et al., No. 1:13-cv-02109 (D. Del., filed Dec. 31, 2013); *see also Delaware Display Group LLC et al. v. Vizio Inc., et al.*, No. 1:13-cv-02112 (D. Del., filed Dec. 31, 2013). As lead counsel in those actions, I have familiarized myself with the subject matter at issue in this proceeding, *i.e.*, light emitting panel assemblies. During the course of those lawsuits, I have developed invalidity defenses for the patent-at-issue in this petition as well as its related patents, all of which concern light emitting panel assemblies. Also in those lawsuits, I have developed infringement allegations that assert the patent-at-issue in this petition against various light emitting panel assemblies, including those found in smart phones, tablets, laptop computers, and televisions to name a few. In my role as the lead attorney in those litigations, I have spent significant time learning the technology involved in light emitting panel assemblies such as those found in the patent-at-issue in this proceeding.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 15th day of December, 2016.



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