

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 IPR2015-01868¹
U.S. Patent No. 7,434,974

**PATENT OWNER'S OBJECTIONS
TO PETITIONER'S DEMONSTRATIVES**

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

¹ Case IPR2016-00910 has been joined with this proceeding.

Pursuant to the Board's Order, Paper 27, Patent Owner Innovative Display Technologies, LLC ("Patent Owner" or "IDT") files these objections to Petitioner's oral argument demonstratives served by Petitioner on December 30, 2016.

Objection No. 1 (to Petitioner's Demonstrative Slide 5)

Patent Owner objects to Slide 5 on the grounds that it includes new argument, in the form of a quotation from Ex. 1026, 53:3-8, for the first time in Petitioner's Demonstratives.

Objection No. 2 (to Petitioner's Demonstrative Slide 9)

Patent Owner objects to Slide 9 on the grounds that it includes new argument, in the form of a quotation to a quotation from Ex. 1006 (7) on page Pretech_000388 (which Petitioner incorrectly cites as Ex. 1006 ¶ 27), for the first time in Petitioner's Demonstratives.

Objection No. 3 (to Petitioner's Demonstrative Slide 14)

Patent Owner objects to Slide 14 on the grounds that it includes new and confusing arguments made for the first time in Petitioner's Demonstratives relating to the annotation to Figure 1 of Kisou.

Objection No. 4 (to Petitioner's Demonstrative Slide 17)

Patent Owner objects to Slide 17 on the grounds that it includes a new argument raised for the first time in Petitioner's Reply, including citation to the '974 patent and deposition testimony about the same, which is prejudicial to Patent

Owner and prohibited by the Trial Practice Guide, Section II.I., “Petitioner Reply to Patent Owner Response and Patent Owner Reply to Opposition to Amend.”

Objection No. 5 (to Petitioner’s Demonstrative Slide 19)

Patent Owner objects to Slide 19 on the grounds that it includes a new and factually incorrect argument raised for the first time in Petitioner’s Reply, relating to assertion that Kisou relies on ““corrugated light paths 31’ for scattering light,” which is prejudicial to Patent Owner and prohibited by the Trial Practice Guide, Section II.I., “Petitioner Reply to Patent Owner Response and Patent Owner Reply to Opposition to Amend.”

Objection No. 6 (to Petitioner’s Demonstrative Slide 20)

Patent Owner objects to Slide 20 on the grounds that it includes a new argument raised for the first time in Petitioner’s Reply, including quotation to Ex. 1008, which is prejudicial to Patent Owner and prohibited by the Trial Practice Guide, Section II.I., “Petitioner Reply to Patent Owner Response and Patent Owner Reply to Opposition to Amend.”

Objection No. 7 (to Petitioner’s Demonstrative Slide 27)

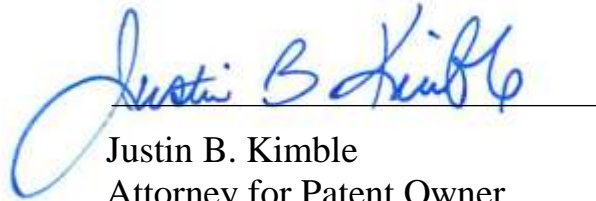
Patent Owner objects to Slide 27 on the grounds that it includes a new argument raised for the first time in Petitioner’s Reply, and includes a misleadingly annotated figure 8 of Ex. 1009, which is prejudicial to Patent Owner and prohibited

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by the Trial Practice Guide, Section II.I., “Petitioner Reply to Patent Owner
Response and Patent Owner Reply to Opposition to Amend.”

Dated: January 6, 2017

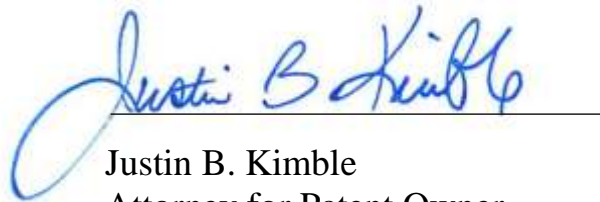
Respectfully submitted,



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CERTIFICATE OF SERVICE

The undersigned hereby certifies that document was served via electronic mail on January 6, 2017, to Petitioner via counsel, Robert Pluta, at the email addresses rpluta@mayerbrown.com, bpaul@mayerbrown.com, astreff@mayerbrown.com, alam@mayerbrown.com, jbeaber@mayerbrown.com, and DDGIPR@mayerbrown.com, pursuant to Petitioner's consent in its revised mandatory notice.



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