

MERCEDES-BENZ USA, LLC,
Petitioners

v.

INNOVATIVE DISPLAY TECHNOLOGIES LLC,
Patent Owner

Patent No. 7,434,974

Issue Date: October 14, 2008

Title: LIGHT EMITTING PANEL ASSEMBLIES

DECLARATION OF THOMAS L. CREDELLE

Case No. IPR2015-01115

Credelle
~~EXHIBIT~~
FOR I.C. 6/2/16 *AK*

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I, Tom Credelle, hereby state and declare that:

I. INTRODUCTION

A. Summary of Opinions

1. Mercedes-Benz USA, LLC (MBUSA) has engaged me in this matter to review U.S. Patent No. 7,434,974 (the '974 patent) (Ex. 1001) and to provide my opinion on whether certain claims of the '974 patent are anticipated or rendered obvious by one or more of the following prior art references:

- Japanese Published Patent Application No. JP H5-45651(U) to Niizuma ("Niizuma")(Ex. 1002);
- Japanese Unexamined Patent Application No. JP H7-064078A to Kisou et al. ("Kisou")(Ex. 1003);

2. As is explained in detail below, it is my opinion that:

- Claims 7, 8, 9, and 13 are anticipated under 35 U.S.C. § 102(b) by Niizuma ("Ground 1");
- Claims 1, 3, 4, and 5 are obvious under 35 U.S.C. § 103 over Niizuma ("Ground 2");
- Claims 7, 8, and 9 are anticipated under 35 U.S.C. § 102(a) by Kisou ("Ground 3");
- Claims 1, 3, 4, 5, and 13 are obvious under 35 U.S.C. § 103 over Kisou ("Ground 4").

3. My opinions and underlying reasoning for those opinions are set forth

panel displays. My full curriculum vitae is attached hereto as Appendix A.

5. I received my M.S. degree in Electrical Engineering from the Massachusetts Institute of Technology in 1970, with an emphasis on Electro-optics and Solid State Materials. I received my B.S. degree in Electrical Engineering in 1969 from Drexel University.

6. I was employed by RCA at Sarnoff Labs in Princeton, NJ from 1970 through 1986 at first as a Member of the technical Staff and later as a Group Manager in charge of all Active Matrix LCD research. During my time at RCA, I participated in research and development projects relating to optical materials and flat panel displays, including LCD devices. In 1983, I established the Thin-Film Transistor (TFT) LCD Program at Sarnoff Labs. As a Group Manager, I led a project that resulted in the development of the first poly-Silicon TFT LCD at Sarnoff Labs. I received the Sarnoff Outstanding Achievement Award for Large-Area Flat Panel TV Developments.

7. From 1986 to 1991, I was employed by GE as the Manager of TFT LCD Research and Development at the GE Research and Development Center in Schenectady, NY. My duties included managing research and development efforts relating to TFT and LCD technology for avionics applications. While employed by

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