IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

DELAWARE DISPLAY GROUP LLC	§	
and INNOVATIVE DISPLAY	§	
TECHNOLOGIES LLC,	§	
	§	C.A. No. 13-cv-2109-RGA
Plaintiffs,	§	
	§	JURY TRIAL DEMANDED
v.	§	
LG ELECTRONICS, INC.,	§ §	
LG ELECTRONICS U.S.A., INC.,	§	
LG DISPLAY CO., LTD., and	§	
LG DISPLAY AMERICA, INC.,	§	
, ,	§	
Defendants.	§	
	Ü	
DELAWARE DISPLAY GROUP LLC	§	
and INNOVATIVE DISPLAY	§	
TECHNOLOGIES LLC,	§	
,	§	C.A. No. 13-cv-2110-RGA
Plaintiffs,	§	
,	§	JURY TRIAL DEMANDED
v.		
	§ §	
PANTECH CO. LTD, and	§	
PANTECH WIRELESS, INC.,	§	
, ,	§	
Defendants.	§	
DELAWARE DISPLAY GROUP LLC	§	
and INNOVATIVE DISPLAY	§	
TECHNOLOGIES LLC,	§	
,	§	C.A. No. 13-cv-2111-RGA
Plaintiffs,	§	
,	§	JURY TRIAL DEMANDED
v.	§	
	§	
SONY CORPORATION, SONY	§	
CORPORATION OF AMERICA, SONY	§	
ELECTRONICS INC., and SONY	§	
MOBILE COMMUNICATIONS (USA)	§	
INC.	§	
Defendants.	§	



DELAWARE DISPLAY GROUP LLC	§	
AND INNOVATIVE DISPLAY	§	
TECHNOLOGIES LLC	§	
	§	C.A. No. 13-cv-2112-RGA
	§	
Plaintiffs,	§	JURY TRIAL DEMANDED
	§	
v.	§	
	§	
VIZIO, INC.,	§	
	§	
Defendant.	§	

PLAINTIFFS' RESPONSIVE BRIEF TO DEFENDANTS' MOTION TO STAY PENDING INTER PARTES REVIEW

Dated: April 22, 2015

dolejko@bcpc-law.com

Jeffrey R. Bragalone (admitted pro hac vice)
Patrick J. Conroy (admitted pro hac vice)
Justin B. Kimble (admitted pro hac vice)
Daniel F. Olejko (admitted pro hac vice)
T. William Kennedy, Jr. (admitted pro hac vice)
BRAGALONE CONROY P.C.
Chase Tower,
2200 Ross Ave., Suite 4500W
Dallas, Texas 75201
214-785-6670 Telephone
214-785-6680 Facsimile
jbragalone@bcpc-law.com
pconroy@bcpc-law.com
jkimble@bcpc-law.com

Brian E. Farnan (Bar No. 4089) Michael J. Farnan (Bar No. 5165) FARNAN LLP 919 North Market Street, 12th Floor Wilmington, Delaware 19801 302-777-0300 Telephone 302-777-0301 Facsimile bfarnan@farnanlaw.com mfarnan@farnanlaw.com

Attorneys for Plaintiffs
DELAWARE DISPLAY GROUP LLC and
INNOVATIVE DISPLAY
TECHNOLOGIES LLC



TABLE OF CONTENTS

I.	INTF	RODUCTION	
II.	SUM	MARY OF THE ARGUMENT	1
	1.	Status of the IPRs	1
	2.	Relationship of the Parties	1
	3.	Timing Factors	2
	4.	Simplification	2
	5.	Discovery and Trial Date	2
	6.	Streamlined and Expedited	2
III.	BAC	KGROUND AND STATEMENT OF FACTS	2
	A.	The Patents	2
	B.	Plaintiffs' Attempts to Resolve This Dispute	
	C.	The Effect of Plaintiffs' Withdrawal of the '547 and '194 Patents	
	D.	A Summary of the IPRs	5
	E.	Background of the Litigation	5
IV.	ARG	UMENT	6
	A.	Defendants' and Third Parties' Serial IPRs are not a Streamlined and Exp Procedure.	
	B.	The Factors do not Favor Stay	7
		A stay will unduly prejudice Plaintiffs	7
		a. The timing factors disfavor a stay	8
		b. The status of the IPRs disfavors stay	101
		c. The relationship between the parties disfavors stay	122



	2.	A stay will not significantly simplify the issues and trial of the case	. 13
	3.	The factor "whether discovery is complete and whether a trial date has been set" weighs against stay	
V.	CONCLUSIO	N	188



TABLE OF AUTHORITIES

Cases

A.L.M. Holding Co. et al. v. Azco Nobel Surface Chemistry LLC, C.A. No. 13-cv-1069-GMS, Order (D. Del. Sep. 17, 2014)17
Bonutti Skeletal Innovations, L.L.C. v. Zimmer Holdings, Inc., C.A. No. 12-cv-1107-GMS, 2014 WL 1369721 (D. Del. Apr. 7, 2014)
Boston Scientific Corp. v. Cordis Corp., 777 F.Supp.2d 783 (D. Del. 2011)
CallWave Commc'ns, LLC v. AT & T Mobility, LLC, C.A. No. 12-cv-1701-RGA, 2015 WL 1284203 (D. Del. Mar. 18, 2015)
Canatelo LLC v. Axis Communications AB, C.A. No. 13-cv-1227-GMS, D.I. 57, (D. Del. May 14, 2014)
Clouding IPLLC v. SAP AG, et al., C.A. No. 13-cv-01456-LPS Oral Order (Jan. 21, 2014)
Elan Microelectronics Corp. v. Pixcir Microelectronics Co. Ltd., No. 2:10-cv-00013, 2013 WL 2394358 (D. Nev. May 30, 2013)
Gen. Elec. Co. v. Vibrant Media, Inc., C.A. No 12-cv-00526-LPS, 2013 WL 6328063 (D. Del. Dec. 4, 2013)
Innovative Display Technologies LLC v. Acer Inc., et al., Case No. 2:13-cv-522-JRG (Lead Case), 2014 WL 4230037 (E.D. Tex. Aug. 26, 2014)6
Innovative Display Techs., LLC v. Acer, Inc., et al., Case No. 2:13-cv-522-JRG (Lead Case), Slip Op., D.I. 220 (E.D. Tex. Dec. 15, 2014)6
Intellectual Ventures I LLC v. Xilinx, Inc., C.A. No. 10-cv-1065-LPS, 2014 WL 906551 (D. Del. Mar. 5, 2014)
McRo Inc. v. Bethesda Softworks LLC, C.A. No. 12-cv-1509-LPS-CJB, Memorandum Order (D. Del. May 1, 2013)10
Message Notification Technologies LLC v. Microsoft Corp., C.A. No. 13-cv-1881-GMS, D.I. 38, slip op. at 4, n.4 (D. Del. Feb. 24, 2015)
Neste Oil OYJ v. Dynamic Fuels, LLC, C.A. No. 12-cy-1744-GMS 2013 WL 3353984 (D. Del July 2, 2013) 7, 10



DOCKET

Explore Litigation Insights



Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time** alerts and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.

