

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SHENZHEN CHINA STAR OPTOELECTRONICS TECHNOLOGY CO., LTD.

Petitioner

v.

AU OPTRONICS CORPORATION

Patent Owner

Patent No. 6,689,629 C1
Issued: November 14, 2014
Filed: March 16, 2010

Inventors: Takatoshi TSUJIMURA et al.

Title: ARRAY SUBSTRATE FOR DISPLAY, METHOD OF
MANUFACTURING ARRAY SUBSTRATE FOR DISPLAY AND DISPLAY
DEVICE USING THE ARRAY SUBSTRATE

Inter Partes Review No.: Unassigned

PETITION FOR *INTER PARTES* REVIEW

TABLE OF CONTENTS

I.	INTRODUCTION	1
II.	MANDATORY NOTICES UNDER 37 C.F.R. § 42.8(a)(1).....	1
	A. Real Party-in-Interest Under 37 C.F.R. § 42.8(b)(1)	1
	B. Related Matters Under 37 C.F.R. § 42.8(b)(2)	1
	C. Lead and Back-Up Counsel.....	2
	D. Service Information.....	2
III.	PAYMENT OF FEES UNDER 37 C.F.R. § 42.013.....	2
IV.	REQUIREMENTS FOR IPR UNDER 37 C.F.R. §§ 42.104.....	2
	A. Grounds for Standing Under 37 C.F.R. § 42.104(a)	2
	B. Priority Date and Prior Art Patents	3
	C. Identification of Challenge Under 37 C.F.R. § 42.104(b) and Relief Requested	4
V.	SUMMARY OF THE '629 PATENT.....	5
	A. Brief Description of the '629 Patent.....	5
	B. Summary of the Prosecution History of the '629 Patent.....	6
VI.	CLAIM CONSTRUCTION	8
VII.	THERE IS A REASONABLE LIKELIHOOD THAT AT LEAST ONE CLAIM OF THE '629 PATENT IS UNPATENTABLE.....	10
	A. Ground 1: Claims 1, 3, 5-6, 9, 11, 14, and 17 are obvious under 35 U.S.C. § 103 in view of Noda, AAPA, Tsujimura, Ichioka, and Shimizu.....	10
	B. Ground 2: Claims 7-8 and 15-16 are obvious under 35 U.S.C. § 103 in view of Noda, AAPA, Tsujimura, Ichioka, Shimizu, and Wicke...29	
	C. Ground 3: Claims 1, 9, and 17 are obvious under 35 U.S.C. § 103 under Noda, AAPA, Tsujimura, Ichioka, and Ono.....	32
	D. Grounds 1-3 are non-cumulative.....	38
VIII.	CONCLUSION.....	39

EXHIBITS

Exhibit	Description
1001	U.S. Patent No. 6,689,629 C1 ("the '629 Patent")
1002	File History of U.S. Patent No. 6,689,629 C1
1003	U.S. Patent No. 6,689,629 B2
1004	File History of U.S. Patent No. 6,689,629 B2
1005	Certified English Translation of Japanese Publication No. P2000-98909A ("Noda")
1006	<i>Low Resistance Gate Line for High-Resolution TFT/LCD Display</i> ("Tsujimura")
1007	U.S. Patent No. 5,546,013 ("Ichioka")
1008	Certified English Translation of Japanese Publication No. HEI 2-189922 ("Shimizu")
1009	U.S. Patent No. 2,990,282 ("Wicke")
1010	Certified English Translation of Japanese Publication No. SHO 63-181355 ("Ono")
1011	Declaration of Prof. Yue Kuo, Dr.Eng.Sci.
1012	Power of Attorney
1013	Japanese Application No. 2001-029587 ("the '587 Application")
1014	Japanese Publication No. P2000-98909A
1015	Japanese Publication No. HEI 2-189922
1016	Japanese Publication No. SHO 63-181355

I. INTRODUCTION

Pursuant to 35 U.S.C. §§ 311-319 and 37 C.F.R. § 42, Petitioner Shenzhen China Star Optoelectronics Technology Co., Ltd. (“CSOT” or “Petitioner”) respectfully requests *Inter Partes* Review (“IPR”) of claims 1, 3, 5-9, 11, and 14-17 of U.S. Patent 6,689,629 C1 (Ex. 1001, “the ’629 Patent”), which was filed on March 16, 2010, issued on November 14, 2014, and is currently assigned to AU Optronics Corporation (“AUO”) according to the U.S. Patent and Trademark Office (“USPTO”) assignment records. There is a reasonable likelihood that Petitioner will prevail with respect to at least one of the claims challenged in this Petition.

II. MANDATORY NOTICES UNDER 37 C.F.R. § 42.8(A)(1)

A. Real Party-in-Interest Under 37 C.F.R. § 42.8(b)(1)

Petitioner is Shenzhen China Star Optoelectronics Technology Co., Ltd., and is the only real party in interest.

B. Related Matters Under 37 C.F.R. § 42.8(b)(2)

Pursuant to 37 C.F.R. § 42.8(b)(2), Petitioner states that the ’629 Patent is the subject of the following patent infringement arbitration by the assignee, AUO, which may affect, or be affected by, a decision in this proceeding: *AUO v. TCL Multimedia Technology Holdings Limited, TCL Corp., and Shenzhen China Star*

Petition for *Inter Partes* Review
U.S. Patent No. 6,689,629 C1

Optoelectronics Technology Co., Ltd, filed in the Hong Kong International Arbitration Centre on September 22, 2015.

Petitioner has requested IPR of U.S. Patent No. 7,652,285 B2, which is not related to the '629 Patent. Each of the patents for which Petitioner seeks IPR has been asserted against Petitioner in the above arbitration.

C. Lead and Back-Up Counsel

Lead counsel for Petitioner is William H. Mandir, Registration No. 32,156, and back-up counsel is John F. Rabena, Registration No. 38,584, both of Sughrue Mion, PLLC. Pursuant to 37 C.F.R. § 42.10(b), a Power of Attorney accompanies this Petition.

D. Service Information

Service information for lead and back-up counsel is provided in the signature block below. Petitioner consents to electronic service.

III. PAYMENT OF FEES UNDER 37 C.F.R. § 42.013

Petitioner authorizes the USPTO to charge Deposit Account 19-4880 for the fees set forth in 37 C.F.R. § 42.15(a) for this Petition for IPR and further authorizes payment for any additional fees to be charged to this Deposit Account.

IV. REQUIREMENTS FOR IPR UNDER 37 C.F.R. §§ 42.104

A. Grounds for Standing Under 37 C.F.R. § 42.104(a)

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.