

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

Patent 7,537,370

DECLARATION OF THOMAS L. CREDELLE

TABLE OF CONTENTS

I.	INTRODUCTION	1
	A. Background and Qualifications.....	1
	B. Information Considered	5
II.	Legal Standards	5
	A. Person of Ordinary Skill in The Art.....	6
	B. Anticipation.....	7
	C. Obviousness	8
	D. Claim Construction	10
III.	Technology Background	11
	A. Light Emitting Panel Assemblies.....	11
	B. Common Light Control Structures and Films.....	19
	C. Low Loss	28
IV.	The '370 Patent	28
	A. Background of The '370 Patent	28
	B. Prosecution History (Ex. 1002).....	31
	C. Asserted Claims	34
	D. Claim Construction	37
V.	Prior Art Analysis.....	40
	A. Claims 1, 4, and 29 are obvious in view of U.S. Patent No. 5,408,388 ("Kobayashi")	40
	1. Claim 1	41
	2. Claim 4	55
	3. Claim 29	55
	B. Claims 13 and 47 are obvious in view of U.S. Patent No. 5,408,388 ("Kobayashi") In View of U.S. Patent No. 5,005,108 ("Pristash")...	65
	1. Claim 13	67
	2. Claim 47	72

C. Claims 1, 4, 5, 9, 13, 29, and 47 are Obvious in view of Suzuki (Ex. 1008)78

1. Claim 178

D. Claims 13 and 47 are Obvious in view of Suzuki and Pristash.....105

E. Claims 1, 4-5, 9, and 13 Are Unpatentable Under 35 U.S.C. § 103(a) As Being Obvious Over Suzuki in view of Murata.....118

VI. SUPPLEMENTATION.....121

I. INTRODUCTION

1. My name is Tom Credelle, and I have been retained by the law firm of Mayer Brown LLP on behalf of K.J. Pretech Co., Ltd. as an expert in the relevant art.

2. I have been asked to provide my opinions and views on the materials I have reviewed in this case related to Ex. 1001, U.S. Patent No. 7,537,370 (“the ’370 Patent”) (“the patent-at-issue”), and the scientific and technical knowledge With respect to the same subject matter before and for a period following the date of the first application for the patent-at-issue was filed.

3. I am compensated at the rate of \$350/hour for my work, plus reimbursement for expenses. My compensation has not influenced any of my opinions in this matter and does not depend on the outcome of this proceeding or any issue in it.

4. My opinion and underlying reasoning for this opinion is set forth below.

A. Background and Qualifications

5. My full curriculum *vitae* is attached hereto as Appendix A.

6. I have more than 40 years of industry experience in research and development in the areas of Liquid Crystal Display (LCD) technology and in other flat panel displays.

7. 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.

8. 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.

9. 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 GE, I led the team that built the world's first 1 million pixel color LCD device. I also led development of numerous other display devices utilizing LCD technology. A key part of this effort was the development of high-brightness backlighting systems for outdoor applications. We succeeded in engineering full sunlight-readable displays.

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