IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

United States Patent No.: 8,530,250	§	Attorney Docket No.:
Inventors: Hirofumi Ichikawa,	§	112868-0001-655
Masaki Hayashi, Shimpei Sasaoka,	§	
Tomohide Miki	§	Customer No.: 28120
Formerly Application No.: 12/737,940	§	
Issue Date: September 10, 2013	§	Petitioner: VIZIO, Inc.
PCT Filing Date: August 27, 2009	§	
§ 371(c)(1), (2), (4) Date: May 13, 2011	§	
Former Group Art Unit: 2895	§	
Former Examiner: Caridad Everhart	§	

For: LIGHT EMITTING DEVICE, RESIN PACKAGE, RESIN-MOLDED BODY, AND METHODS FOR MANUFACTURING LIGHT EMITTING DEVICE, RESIN PACKAGE AND RESIN-MOLDED BODY

MAIL STOP PATENT BOARD

Patent Trial and Appeal Board United States Patent and Trademark Office Post Office Box 1450 Alexandria, Virginia 22313-1450

> DECLARATION OF DR. STANLEY R. SHANFIELD IN SUPPORT OF PETITION FOR *INTER PARTES* REVIEW OF UNITED STATES PATENT NO. 8,530,250

> > **NICHIA EXHIBIT 2002**

Vizio, Inc. v. Nichia Corporation Case IPR2018-00386



TABLE OF CONTENTS

I.	Intro	Introduction				
II.	Background and Qualifications					
III.	Priority Date and One of Ordinary Skill					
IV.			Relied Upon			
V.		_	d on the State of the Art			
VI.	Anal	ysis of	the '250 Patent	15		
	A.	Over	view of the '250 Patent	15		
	B.	Over	view of the '250 Patent Prosecution History	22		
	C.	Clair	n Construction of the '250 Patent Claims	25		
VII.	The C	Challe	nged Claims are Invalid	28		
	A.	Lega	1 Standards	28		
	B.	•	ns 1, 7, 17, 19 and 21 Are Obvious Under §103 Over			
		Kour	ng, Urasaki, Oshio, and/or Suenaga	33		
		1.	Overview of U.S. Patent Publication No. 2008/0261339			
			("Koung")	33		
		2.	Overview of Japanese Patent Publication No. 2007-			
			235085 ("Urasaki")	40		
		3.	Overview of U.S. Patent Publication No. 2005/0280017			
			("Oshio")	43		
		4.	Overview of Japanese Patent Publication No. JP2001-			
			036154 ("Suenaga")	46		
		5.	Invalidity of Claim 1 Over Grounds 1-2: (1) Koung and			
			Urasaki; (2) Koung, Urasaki, and Oshio	48		
		6.	Invalidity of Claim 7 Over Grounds 1-2: (1) Koung and			
		_	Urasaki; (2) Koung, Urasaki, and Oshio	72		
		7.	Invalidity of Claim 17 Over Grounds 3-4: (3) Koung; (4)	70		
		0	Koung and Oshio	78		
		8.	Invalidity of Claim 19 Over Grounds 3-6: (3) Koung; (4)			
			Koung and Oshio; (5) Koung and Suenaga; (6) Koung, Oshio and Suenaga	80		
		9.	Invalidity of Claim 21 Over Grounds 3-4: (3) Koung; (4)	60		
		7.	Koung and Oshio	85		
17111	C.		_			
VIII. IX		ndary (Considerations	86 87		



APPENDIX A (Curriculum Vitae) APPENDIX B (List of Materials Considered) APPENDIX C (Claim Charts)



I, Dr. Stanley Shanfield, hereby declare under penalty of perjury under the laws of the United States of America:

I. INTRODUCTION

- 1. I have been retained to provide assistance regarding U.S. Patent No. 8,530,250 ("the '250 patent"). Specifically, I have been asked to consider the validity of claims 1, 7, 17, 19, and 21 of the '250 patent (the "Challenged Claims"). I have personal knowledge of the facts and opinions set forth in this declaration, and believe them to be true. If called upon to do so, I would testify competently thereto. I have been warned that willful false statements and the like are punishable by fine or imprisonment, or both.
- 2. I am being compensated for my time at my standard consulting rate of \$385 per hour. I am also being reimbursed for expenses that I incur during the course of this work. My compensation is not contingent upon the results of my study, the substance of my opinions, or the outcome of any proceeding involving the challenged claims. I have no financial interest in the outcome of this matter or on the pending litigation between Petitioner and Patent Owner.
- 3. A table of contents and a list of exhibits referenced herein are included above.

II. BACKGROUND AND QUALIFICATIONS

4. I offer statements and opinions on behalf of Petitioner VIZIO, Inc.



("VIZIO" or "Petitioner"), generally regarding the validity, novelty, prior art, obviousness considerations, and understanding of a person of ordinary skill in the art ("POSITA") as it relates to U.S. Patent No. 8,530,250 ("the '250 patent"). Attached hereto as Appendix A, is a true and correct copy of my Curriculum Vitae describing my background and experience.

- 5. As set forth in my curriculum vitae, I received a B.S. degree in Physics from the University of California, Irvine in 1977, and was a member of the Phi Beta Kappa Society. In 1975, I received the University of California Regents Award for Outstanding Research on experimental and theoretical work on rotating relativistic electron beams. Under full Energy Research and Development Administration scholarship, I received a Ph.D. in Physics from the Massachusetts Institute of Technology in 1981.
- 6. Starting in 1985 at Raytheon Research Division, most of my work focused on the development, packaging, and testing of semiconductor devices, including devices made using GaAs, AlGaAs, InGaAs, GaN, and SiC. During the late 1980s and most of the 1990s, I was directly involved in the epitaxial growth and packaging of electronic devices and integrated circuits, specialized LED devices and optical detectors. Along with other activities, I produced, packaged and tested LEDs for government and commercial applications e.g. display illumination devices, fiber optic modules, and detection instruments. Experimental



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.

