

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

VIZIO, INC.,
Petitioner

v.

NICHIA CORPORATION,
Patent Owner

Case No. IPR2018-00386
Patent 9,490,411

**DECLARATION OF DRAGO N. GREGOV IN SUPPORT OF
PETITIONER'S REPLY**

I, Drago N. Gregov, make the following Declaration pursuant to 28 U.S.C.

§ 1746:

1. I am a Litigation Paralegal Specialist at the law firm of Ropes & Gray LLP.
2. I provide this Declaration in connection with the above-identified *Inter Partes* Review proceeding requested at the United States Patent and Trademark Office by VIZIO, Inc. Unless otherwise stated, the facts stated in this Declaration are based on my personal knowledge.
3. **Exhibit 1018** hereto is a true and correct copy of excerpts from the File History of U.S. Patent Application No. 15/360,316 (U.S. Patent No. 10,115,870) to Hirofumi Ichikawa, Masaki Hayashi, Shimpei Sasaoka and Tomohide Miki, which I downloaded on December 6, 2018 from the United States Patent and Trademark Office (“USPTO”) Patent Application Information Retrieval (“PAIR”) website and which is a record of the USPTO to which all parties have access. An exhibit label and page numbers on all pages have been added to the bottom of this document but no other alterations have been made.
4. **Exhibit 1020** hereto is a true and correct copy of United States Patent Publication No. 2005/0151149 by Chee Wai Chia, Peng Koay and Lye Yee Wong, which I downloaded on December 6, 2018 from the United States Patent and

Trademark Office (“USPTO”) Patent Application Information Retrieval (“PAIR”) website and which is a record of the USPTO to which all parties have access. An exhibit label and page numbers on all pages have been added to the bottom of this document but no other alterations have been made.

5. **Exhibit 1021** hereto is a true and correct copy of United States Patent Publication No. 2004/0126913 by Ban P. Loh, which I downloaded on December 6, 2018 from the United States Patent and Trademark Office (“USPTO”) Patent Application Information Retrieval (“PAIR”) website and which is a record of the USPTO to which all parties have access. An exhibit label and page numbers on all pages have been added to the bottom of this document but no other alterations have been made.

6. **Exhibit 1022** hereto is a true and correct copy of United States Patent Publication No. 2005/0269587 by Ban P. Loh and Gerald H. Negley, which I downloaded on December 6, 2018 from the United States Patent and Trademark Office (“USPTO”) Patent Application Information Retrieval (“PAIR”) website and which is a record of the USPTO to which all parties have access. An exhibit label and page numbers on all pages have been added to the bottom of this document but no other alterations have been made.

7. **Exhibit 1024** hereto is a true and correct copy of United States Patent Publication No. 2004/0106234 by Joerg-Erich Sorg and Gertrud Kraeuter, which I

downloaded on December 7, 2018 from the United States Patent and Trademark Office (“USPTO”) Patent Application Information Retrieval (“PAIR”) website and which is a record of the USPTO to which all parties have access. An exhibit label and page numbers on all pages have been added to the bottom of this document but no other alterations have been made.

8. **Exhibit 1025** hereto is a true and correct copy of Patent Owner’s Preliminary Response in IPR2017-02011, Paper 12, which I downloaded on December 5, 2018 from the Patent Trial and Appeal Board (“PTAB”) to which all parties have access. An exhibit label and page numbers on all pages have been added to the bottom of this document but no other alterations have been made.

9. **Exhibit 1026** hereto is a true and correct copy of an excerpt from “Webster’s Third New International Dictionary”, Merriam-Webster, Incorporated, 2002. An exhibit label and page numbers on all pages have been added to the bottom of this document but no other alterations have been made.

10. **Exhibit 1027** hereto is a true and correct copy of an excerpt from the “Shorter Oxford English Dictionary”, Oxford University Press, Sixth Edition, 2007. An exhibit label and page numbers on all pages have been added to the bottom of this document but no other alterations have been made.

11. **Exhibit 1029** hereto is a true and correct copy of U.S. Patent No. 10,115,870 to Hirofumi Ichikawa, Masaki Hayashi, Shimpei Sasaoka and

Tomohide Miki, which I downloaded on December 10, 2018 from the United States Patent and Trademark Office (“USPTO”) Patent Application Information Retrieval (“PAIR”) website and which is a record of the USPTO to which all parties have access. An exhibit label and page numbers on all pages have been added to the bottom of this document but no other alterations have been made.

12. **Exhibit 1039** hereto is a true and correct copy of an excerpt from the “IEEE Standard Glossary of Computer Hardware Terminology”, IEEE Std 610.10-1994, October 12, 1995. An exhibit label and page numbers on all pages have been added to the bottom of this document but no other alterations have been made.

13. I have been warned that willful false statements and the like are punishable by fine or imprisonment, or both. I make this declaration of my own personal knowledge, and all statements are true. If called to testify as to the matters stated herein, I could and would testify competently.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 11th day of December, 2018, at East Palo Alto, California.


Drago N. Gregov