

UNITED STATES PATENT AND TRADEMARK OFFICE

IN THE UNITED STATES PATENT TRIAL AND APPEAL BOARD

BLUEHOUSE GLOBAL LTD.
Petitioner

v.

SEMICONDUCTOR ENERGY LABORATORY CO., LTD.
Patent Owner

CASE No. IPR2018-01362

U.S. PATENT NO. 8,492,840 B2

PETITION FOR *INTER PARTES* REVIEW

Mail Stop *Patent Board*
Patent Trial and Appeal Board
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List of Exhibits

- Ex. 1001 United States Letters Patent No. 8,492,840 B2
- Ex. 1002 Prosecution history of U.S. Patent No. 8,492,840 B2 (Excluding foreign prior art references).
- Ex. 1003 Declaration of Richard A. Flasck
- Ex. 1004 United States Patent Application Publication No. 2008/0299693 A1 (*“Toyota”*)
- Ex. 1005 United States Patent Application Publication No. 2005/0173752 A1 (*“Chung”*)
- Ex. 1006 United States Letters Patent No. 6,784,453 (*“Miyazaki”*)
- Ex. 1007 United States Patent Application Publication No. 2007/0072439 A1 (*“Akimoto”*)

I. INTRODUCTION

BlueHouse Global Ltd. (“Petitioner”) hereby petitions for *inter partes* review of claims 1, 2, 4, 14, 16, 17 and 19 (the “challenged claims”) of U.S. Patent No. 8,492,840 (“the ‘840 Patent”) (Ex. 1001) under 35 U.S.C. §§ 311–319 and 37 C.F.R. § 42. According to the assignment information on the front of the ‘840 Patent, and the records of the United States Patent & Trademark Office (the “USPTO”), the ‘840 Patent is assigned to, and therefore owned by, Semiconductor Energy Laboratory Co., Ltd. (the “Patent Owner”). For the reasons provided in detail below, the challenged claims should be found unpatentable and canceled.

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

A. Real Parties-In-Interest (37 C.F.R. § 42.8(b)(1))

The real parties-in-interest in this matter are Petitioner BlueHouse Global Ltd. and its parent company, Caesar Global Fund.

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

As of the filing date of this Petition, Petitioner is unaware of any matters involving the ‘840 Patent pending in any United States court or administrative agency

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