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 IPR: 2018-01393

U.S. PATENT NO.9,293,545 B2

PETITION FOR INTER PARTES REVIEW

Mail Stop Patent Board
Patent Trial and Appeal Board
U.S. Patent and Trademark Office
P.O. Box 1450
Alexandria, VA 22313-1450

DOCKET

Table of Contents

I.	INTI	RODUCTION1
II.	MAN	NDATORY NOTICES (37 C.F.R. § 42.8)1
	A.	Real Parties-In-Interest (37 C.F.R. § 42.8(b)(1))1
	В.	Related Matters (37 C.F.R. § 42.8(b)(2))1
	C.	Lead and Backup Counsel (37 C.F.R. § 42.8(b)(3))2
	D.	Service Information (37 C.F.R. § 42.8(b)(4))2
III.	GRO	OUNDS FOR STANDING (37 C.F.R. § 42.104(a))2
IV.	IDE	NTIFICATION OF CHALLENGES
V.	BAC	KGROUND4
	A.	Technology4
	B.	The '545 Patent5
	C.	Prosecution History7
VI.	PER	SON OF ORDINARY SKILL IN THE ART8
VII.	CLA	IM CONSTRUCTION9
VIII.		NTIFICATION OF HOW EACH CHALLENGED IM OF THE '545 PATENT IS UNPATENTABLE12
	A.	Challenge #1: Claims 1, 5, 7-11, 15 and 17-20 are anticipated under pre-AIA 35 U.S.C. § 102(e) by <i>Toyota</i>



	1.	Claim 1	14		
	2.	Claim 5	25		
	3.	Claim 7	31		
	4.	Claim 8	32		
	5.	Claim 9	38		
	6.	Claim 10	38		
	7.	Claim 11	39		
	8.	Claim 15	44		
	9.	Claim 17	45		
	10.	Claim 18	45		
	11.	Claim 19	47		
	12.	Claim 20	48		
В.	unde	Challenge #2: Claims 3, 4, 13 and 14 are obvious under pre-AIA 35 U.S.C. 103(a) over <i>Toyota</i> in view of <i>Akimoto</i>			
	1.	Claim 3	49		
	2.	Claim 4	52		
	3.	Claim 13	53		
	4.	Claim 14	54		



IX.	INSTITUTION SHOULD NOT BE DENIED BASED				
	ON §325(d)				
X.	CONCLUSION	56			



List of Exhibits

Ex. 1001	United States Letters Patent No. 9,293,545 B2
Ex. 1002	Prosecution history of U.S. Patent No. 9,293,545 B2
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. 2007/0072439 A1 ("Akimoto")
Ex. 1006	United States Patent Application Publication No. 2005/0173752 A1 ("Chung")



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.

