

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

TIANMA MICROELECTRONICS CO. LTD.,
Petitioner,

v.

JAPAN DISPLAY INC. and PANASONIC LIQUID CRYSTAL
DISPLAY CO., LTD.,
Patent Owner.

Case No. IPR2021-01028
U.S. Patent No. 9,793,299

**DECLARATION OF RICHARD FLASCK
IN SUPPORT OF PETITION FOR *INTER PARTES* REVIEW OF
U.S. PATENT NO. 9,793,299**

Table of Contents

I. Introduction.....1

II. Qualifications and Background2

III. Materials Considered.....7

IV. Legal Standards8

 A. Claim Construction.....8

 B. Obviousness Under 35 U.S.C. § 103.....9

V. The '299 Patent.....13

 A. Overview of the '299 Patent.....13

 B. Prosecution History of the '299 Patent15

 C. Person of Ordinary Skill in the Art16

VI. Claim Construction of Terms of the '299 Patent17

VII. Summary of Opinions on Unpatentability.....17

VIII. Obviousness of claims 1, 3-6, and 8-11 over Maekawa and Takahata21

 A. Independent Claim 121

 B. Claim 353

 C. Claim 456

 D. Claim 557

 E. Independent Claim 658

 F. Claim 863

 G. Claim 964

 H. Claim 1065

 I. Claim 1166

Declaration of Mr. Richard Flasck
U.S. Patent No. 9,793,299

IX. Obviousness of claims 2 and 7 over Maekawa, Takahata, and Nakanishi...66

 A. Claim 266

 B. Claim 768

X. Obviousness of claims 15 and 16 over Maekawa, Takahata, and Nagano ...69

 A. Claim 1569

 B. Claim 1675

XI. Conclusion76

I. INTRODUCTION

1. I, Mr. Richard Flasck, submit this declaration to state my opinions on the matter described below.

2. I have been retained by Petitioner Tianma Microelectronics Co. Ltd., (“Tianma” or “Petitioner”), as an independent expert in this proceeding before the United States Patent and Trademark Office. Although I am being compensated at my usual and customary rate of \$495.00 per hour, no part of my compensation depends on the outcome of this proceeding, and I have no other interest in this proceeding.

3. I understand that this proceeding involves U.S. Patent No. 9,793,299 (the “’299 patent”), and I have been asked to provide my opinions as to the patentability of the claims of the ’299 patent. I understand that the application for the ’299 patent was filed on February 17, 2015, and claims priority to a foreign application having a filing date of December 26, 2005.

4. I have been asked to consider the validity of certain claims of the ’299 patent based on certain prior art references. I have also been asked to consider the state of the art and prior art available as of December 26, 2005. Based on the prior art discussed in this declaration, it is my opinion that claims 1-11, 15, and 16 of the ’299 patent are unpatentable for the reasons provided below.

II. QUALIFICATIONS AND BACKGROUND

5. I believe that I am well qualified to serve as a technical expert in this matter based upon my educational and work experience, and specifically, flat panel display devices, including liquid crystal displays (“LCDs”).

6. I received a Bachelor of Science degree in Physics from the University of Michigan, Ann Arbor, in 1970. I thereafter received a Master of Science degree in Physics from Oakland University in Rochester, Michigan, in 1976. I am the founder and CEO of RAF Electronics Corp., where I developed and patented Liquid Crystal on Silicon (LCOS) microdisplay projection technology as well as developed proprietary LED-based Solid State Lighting (SSL) products.

7. After receiving my Bachelor’s degree, I was employed as a scientist and a manager by Energy Conversion Devices, Inc., from 1970 through 1982. My work at Energy Conversion Devices concerned the development of thin film photovoltaics, ablative imaging films, non-volatile memory, multi-chip modules, and superconducting materials. After leaving Energy Conversion Devices, I founded and served as CEO of Alphasil, Inc., where I developed amorphous silicon thin film transistor (TFT) active matrix liquid crystal displays (AMLCDs). I established one of the world’s first TFT AMLCD production lines in 1985. My work at Alphasil included TFT process and circuit design, data driver and gate

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