

Filed on behalf of Innovative Display Technologies LLC
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UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

MERCEDES-BENZ USA, LLC

Petitioner

v.

INNOVATIVE DISPLAY TECHNOLOGIES LLC.

Patent Owner

Case IPR2015-00368

U.S. Patent No. 7,434,974

**PATENT OWNER'S UPDATED MANDATORY NOTICES PURSUANT TO
37 C.F.R. §§ 42.8(a)(2) and 42.8(b)**

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U.S. Patent & Trademark Office
P.O. Box 1450

Patent Owner Innovative Display Technologies (“IDT”) hereby files its mandatory notices pursuant to 37 C.F.R. §§ 42.8(a)(2) and 42.8(b):

A. Section 42.8(b)(1) – Real Party-In-Interest

Patent Owner identifies Acacia Research Group LLC and Acacia Research Corporation as its real parties-in-interest.

B. Section 42.8(b)(2) – Related Matters

Patent Owner asserts that Petitioner infringes the patent at issue in this *inter partes* review in the following lawsuit: *Innovative Display Technologies LLC v. Mercedes-Benz U.S. International, Inc. et al.*, No. 2:14-cv-00535 (E.D. Tex., filed Apr. 24, 2014). In addition to that lawsuit, Patent Owner has alleged infringement of the patent at issue in this *inter partes* review in the following matters:

1. *Innovative Display Technologies LLC v. Acer Inc., et al.*, No. 2:13-cv-00522 (E.D. Tex., filed June 28, 2013);
2. *Innovative Display Technologies LLC v. Dell Inc.*, No. 2:13-cv-00523 (E.D. Tex., filed June 28, 2013);
3. *Innovative Display Technologies LLC v. Hewlett-Packard Company*, No. 2:13-cv-00524 (E.D. Tex., filed June 28, 2013);
4. *Innovative Display Technologies LLC v. Huawei Investment and Holding Co., Ltd. et al.*, No. 2:13-cv-00525 (E.D. Tex., filed June 28, 2013);

5. *Innovative Display Technologies LLC v. Blackberry Ltd. et al.*, No. 2:13-cv-00526 (E.D. Tex., filed June 28, 2013);
6. *Innovative Display Technologies LLC v. ZTE Corporation et al.*, No. 2:13-cv-00527 (E.D. Tex., filed June 28, 2013);
7. *Innovative Display Technologies LLC v. Microsoft Corp.*, No. 2:13-cv-00783 (E.D. Tex., filed Oct. 1, 2013);
8. *Innovative Display Technologies LLC v. Nokia Corp. et al.*, No. 2:13-cv-00784 (E.D. Tex., filed Oct. 1, 2013);
9. *Innovative Display Technologies LLC v. Apple Inc.*, No. 2:14-cv-00030 (E.D. Tex., filed Jan. 17, 2014);
10. *Innovative Display Technologies LLC v. BMW of North America, LLC et al.*, No. 2:14-cv-00106 (E.D. Tex., filed Feb. 21, 2014);
11. *Innovative Display Technologies LLC v. Canon U.S.A. Inc. et al.*, No. 2:14-cv-00142 (E.D. Tex., filed Feb. 26, 2014);
12. *Innovative Display Technologies LLC v. Garmin International, Inc. et al.*, No. 2:14-cv-00143 (E.D. Tex., filed Feb. 26, 2014);
13. *Innovative Display Technologies LLC v. MiTAC Digital Corporation et al.*, No. 2:14-cv-00144 (E.D. Tex., filed Feb. 26, 2014);
14. *Innovative Display Technologies LLC v. Nikon, Inc. et al.*, No. 2:14-cv-00145 (E.D. Tex., filed Feb. 27, 2014);

15. *Innovative Display Technologies LLC v. TomTom North America Inc. et al.*, No. 2:14-cv-00146 (E.D. Tex., filed Feb. 27, 2014);
16. *Innovative Display Technologies LLC v. Toyota Motor Corp. et al.*, No. 2:14-cv-00200 (E.D. Tex., filed Mar. 10, 2014);
17. *Innovative Display Technologies LLC v. Hyundai Motor Group et al.*, No. 2:14-cv-00201 (E.D. Tex., filed Mar. 10, 2014);
18. *Innovative Display Technologies LLC v. Nissan Motor Co., Ltd. et al.*, No. 2:14-cv-00202 (E.D. Tex., filed Mar. 10, 2014);
19. *Innovative Display Technologies LLC v. Volkswagen AG et al.*, No. 2:14-cv-00300 (E.D. Tex., filed Apr. 7, 2014);
20. *Innovative Display Technologies LLC et al. v. Apple Inc.*, No. 2:14-cv-00301 (E.D. Tex., filed Apr. 8, 2014);
21. *Innovative Display Technologies LLC v. Google Inc., et al.*, No. 2:14-cv-00302 (E.D. Tex., filed Apr. 8, 2014);
22. *Innovative Display Technologies LLC v. Best Buy Co., Inc. et al.*, No. 2:14-cv-00532 (E.D. Tex., filed Apr. 24, 2014);
23. *Delaware Display Group LLC et al. v. Sony Corp. et al.*, No. 1:13-cv-02111 (D. Del., filed Dec. 31, 2013).
24. *Innovative Display Technologies LLC v. Mazda Motor Corporation et al.*, No. 2:14-cv-00624 (E.D. Tex., filed May 13, 2014);

25. *Innovative Display Technologies LLC et al. v. AT&T Inc. et al.*, No. 2:14-cv-00720 (E.D. Tex., filed June 25, 2014);
26. *Innovative Display Technologies LLC et al. v. Sprint Corporation et al.*, No. 2:14-cv-00721 (E.D. Tex., filed June 25, 2014);
27. *Innovative Display Technologies LLC et al. v. Verizon Communications, Inc. et al.*, No. 2:14-cv-00722 (E.D. Tex., filed June 25, 2014);
28. *Innovative Display Technologies LLC et al. v. T-Mobile US, Inc. et al.*, No. 2:14-cv-00723 (E.D. Tex., filed June 25, 2014);
29. *Delaware Display Group LLC et al. v. Amazon.com Inc.*, No. 1:13-cv-02106 (D. Del., filed Dec. 31, 2013);
30. *Delaware Display Group LLC et al. v. HTC Corporation et al.*, No. 1:13-cv-02107 (D. Del., filed Dec. 31, 2013);
31. *Delaware Display Group LLC et al. v. Lenovo Holding Company Inc. et al.*, No. 1:13-cv-02108 (D. Del., filed Dec. 31, 2013);
32. *Delaware Display Group LLC et al. v. Pantech Co. Ltd. et al.*, No. 1:13-cv-02110 (D. Del., filed Dec. 31, 2013);
33. *Delaware Display Group LLC et al. v. LG Electronics Inc. et al.*, No. 1:13-cv-02109 (D. Del., filed Dec. 31, 2013);
34. *Delaware Display Group LLC et al. v. VIZIO Inc. et al.*, No. 1:13-cv-02112 (D. Del., filed Dec. 31, 2013);

35. *Innovative Display Technologies LLC v. Ford Motor Company*, No.

1:14-cv-00849 (D. Del., filed June 30, 2014); and

36. *Innovative Display Technologies LLC v. General Motor Company*, No.

1:14-cv-00850 (D. Del., filed June 30, 2014).

There are five other pending request for *inter partes* review of the patent at issue in this proceeding: IPR2014-01092 (**not instituted**); IPR2015-00497; IPR2015-00755; IPR2015-00831; and IPR2015-00832.

In addition, there are 28 other pending requests for *inter partes* review for patents related to the patent at issue in this proceeding. Those IPRs are as follows:

U.S. Patent No. 6,755,547

1. IPR2014-01357

2. IPR2015-00361

U.S. Patent No. 7,300,194

3. IPR2014-01097

4. IPR2015-00360

5. IPR2015-00490

6. IPR2015-00749

U.S. Patent No. 7,384,177

7. IPR2014-01362

8. IPR2015-00359

9. IPR2015-00489

10. IPR2015-00756

11. IPR2015-00835

U.S. Patent No. 7,404,660

12. IPR2014-01094

13. IPR2015-00363

14. IPR2015-00487

15. IPR2015-00495

16. IPR2015-00745

U.S. Patent No. 7,434,973

17. IPR2015-00506

U.S. Patent No. 7,537,370

18. IPR2014-01096

19. IPR2015-00493

20. IPR2015-00753

U.S. Patent No. 7,914,196

21. IPR2014-01359

22. IPR2015-00492

23. IPR2015-00757

U.S. Patent No. 8,215,816

24. IPR2014-01095

25. IPR2015-00366

26. IPR2015-00496

27. IPR2015-00752

28. IPR2015-00834

1. Section 42.8(b)(3) – Lead and Back-Up Counsel

Patent Owner identifies the following lead and back-up counsel:

Lead Counsel:

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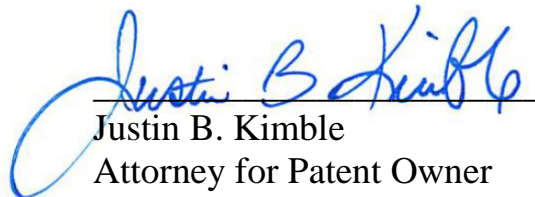
2. Section 42.8(b)(4) – Service Information

- (i) electronic mailing addresses: JKimble-IPR@bcpc-law.com;
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Patent Owner consents to service by e-mail at the address identified in Section (i) above.

Dated: March 13, 2015

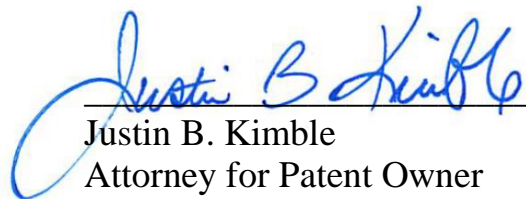
Respectfully submitted,



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CERTIFICATE OF SERVICE

The undersigned hereby certifies that document has been served via electronic mail on March 13, 2015, to Petitioner at following email addresses pursuant to its Updated Mandatory Notice – Substitution of Counsel: Scott.Doyle@Shearman.com and Jonathan.DeFosse@Shearman.com.



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