

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

HISENSE INTERNATIONAL CO. LTD.; HISENSE INTERNATIONAL (HONG
KONG) AMERICA INVESTMENTS CO. LTD.,

Petitioners,

v.

VISTA PEAK VENTURES, LLC,

Patent Owner.

Case No. IPR2023-00725

U.S. Patent No. 6,594,143

**PETITION FOR *INTER PARTES* REVIEW
OF U.S. PATENT NO. 6,594,143 (the “143 Patent”)**

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TABLE OF ABBREVIATIONS AND CONVENTIONS

Petitioners	HISENSE INTERNATIONAL CO. LTD.; HISENSE INTERNATIONAL (HONG KONG) AMERICA INVESTMENTS CO. LTD.
Patent Owner	VISTA PEAK VENTURES, LLC
'143 Patent	U.S. Patent No. 6,594,143 (the "'143 Patent") (the patent being challenged herein)
Flasck Dec.	Declaration of Dick Flasck submitted herewith
POSITA	Person of ordinary skill in the art
Kopish	U.S. Patent No. 4,755,035

PETITIONERS' EXHIBIT LIST

Ex. No.	Brief Description
1001	U.S. Patent No. 6,594,143
1002	U.S. Patent No. 6,594,143 File History
1003	Flasck Declaration
1004	U.S. Patent No. 4,755,035 (Kopish)
1005	[Intentionally Omitted]
1006	Flasck CV
1007	Japanese Patent Application No. 10-353579
1008	143 Patent Notice of Allowability
1009	Proof of Service of Complaint

I. Introduction

Petitioners request *inter partes* review (“IPR”) of claims 1–3 (“Challenged Claim”) of U.S. Patent No. 6,594,143 (“’143 Patent”).

The ’143 Patent should never have issued. The three claims were allowed on the basis that none of the references allegedly “disclose at least one screw to fix the liquid crystal module to the frame member by passing through the at least one hole on the back frame of the liquid crystal module, in combination with the other claimed elements of the embodiments recited.” Ex. 1008, ¶ 2. But at least the prior art identified herein, which was never considered by the Examiner, discloses the claimed features. For example, Kopish, which was published ***25 years prior to the ’143 Patent’s earliest effective filing date*** discloses a Liquid Crystal Display (“LCD”) display assembly wherein “threaded holes in mounting posts are provided in the carrier such that mounting screws subsequently mount the carrier subassembly, comprising the carrier, LCD devices and snap-on clips, to the 45 printed circuit board assembly.” Ex. 1004, 3:43-46.

Petitioners therefore request that the Board institute trial and find all claims unpatentable based on the prior art identified herein.

II. Requirements for *Inter Partes* Review

This Petition complies with all statutory requirements, as well as 37 C.F.R. §§ 42.104, 42.105, and 42.15, and should be accorded a filing date pursuant to

37 C.F.R. § 42.106. The required fee is being paid electronically through P-TACTS.

Petitioners' mandatory notices are found in Section VI below.

A. Certification

As required by 37 C.F.R. § 42.104(a), Petitioners certify that the '143 Patent "is available for inter partes review and that the Petitioner[s are] not barred or estopped from requesting an inter partes review challenging the patent claims on the grounds identified in the petition." Petitioners certify that this Petition is filed within one year of the date of service of the complaint—August 23, 2022. Ex. 1009. Neither Petitioners nor any party in privity with Petitioners has filed a civil action challenging the validity of any claim of this patent. Petitioners therefore certify that the '143 Patent is available for *inter partes* review.

B. Identification of Challenges

Under 37 C.F.R. §§ 42.104(b) and 42.22, Petitioners request that the Board institute this IPR on claims 1–3 of the '143 Patent and cancel those claims as unpatentable on the following grounds:

Ground	Claims	Basis for Unpatentability
1	1-3	Anticipated under 35 U.S.C. § 102(b) by Kopish (Ex. 1004)
2	3	Obviousness under 35 U.S.C. § 103 over Kopish (Ex. 1004) and Background Knowledge of POSITA

III. The '143 Patent

A. Effective Filing Date

The '143 Patent resulted from Application No. US09/459,280 (“’280 Application”), filed December 13, 1999. The '143 Patent alleges priority to Japanese Patent Application No. 10-353579 filed December 11, 1998. For the purposes of this Petition, Petitioners assume that the Challenged Claims are entitled to a priority date no earlier than December 11, 1998. All references relied on herein qualify as prior art under section 102(b).

B. Level of Ordinary Skill in the Art

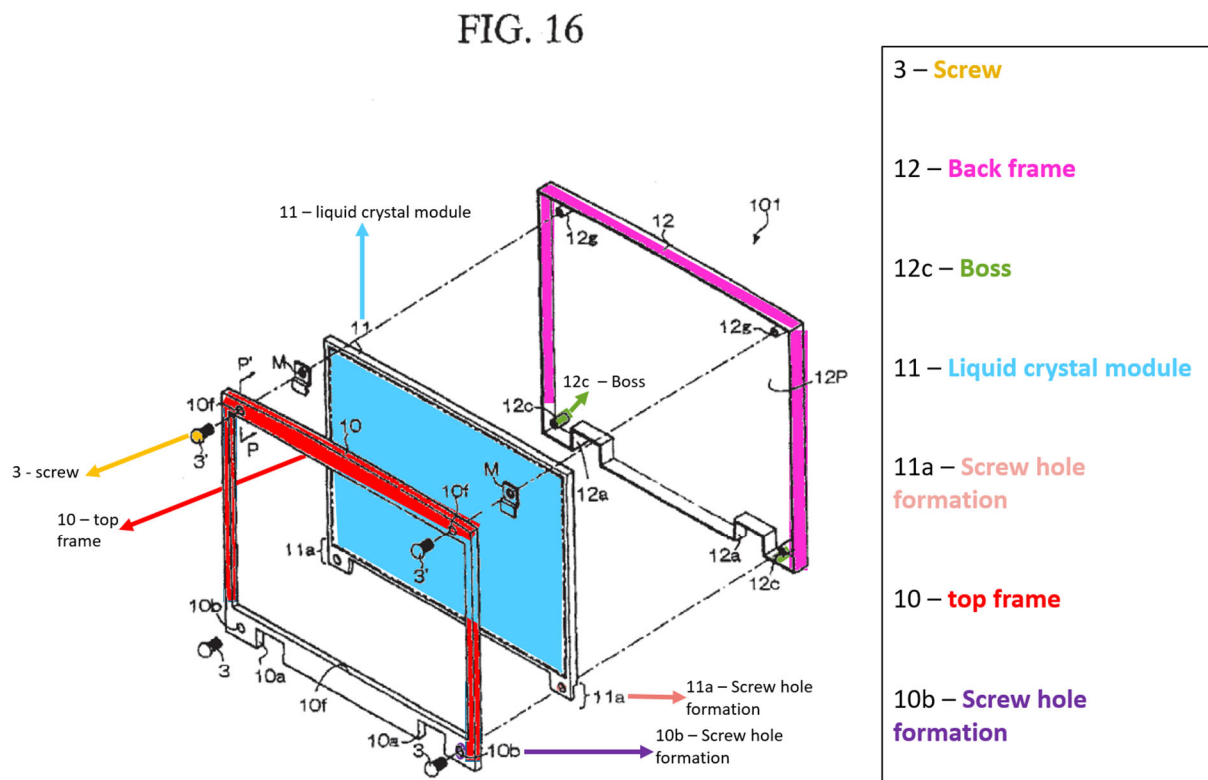
As of December 11, 1998, a person of ordinary skill in the art (“POSITA”) in the technological field of the '143 Patent would have possessed (i) a bachelor’s degree in mechanical engineering, optical engineering, or physics, or undergraduate training in an equivalent field, and (ii) at least two years of experience in the design and/or implementation of electric apparatuses for liquid crystal displays (“LCDs”). Additional graduate education could substitute for professional experience, and significant work experience could substitute for formal education. *See* Ex. 1003, ¶¶ 76–81.

C. Overview of the '143 Patent

The '143 Patent discloses an electric apparatus such as for use with an LCD device. “The present invention relates to a liquid crystal module mounting structure, and more particularly to a structure for mounting a liquid crystal module serving as

a display to a mobile terminal such as a note type personal computer.” Ex. 1001, 1:6-11. The Challenged Claims are directed to an electric apparatus, comprising: a frame member having at least one screw hole in a first location through which a screw can pass through the back side of; an LCD with a front display panel and a back frame allowing the LCD to be mounted to the frame member, the back frame including at least one threaded screw hole in a second location corresponding to the first screw hole. *See* Ex. 1003, ¶ 90.

The annotated '143 Patent Figure 16 copied below is illustrative:



Ex. 1001, Fig. 16 (annotated).

As shown, the '143 Patent claims the invention as the arrangement of an LCD module being attached to a frame by means of a screw (3) that enters from the back side of the frame (10), passes through a clearance hole in the frame (10b), and secures the LCD module (11) to the frame (10) by having the screw (3) engage a threaded screw hole (12c) on the back of the LCD module (11).

D. Relevant Prosecution History

The Examiner initially rejected the '143 Patent claims as anticipated by Ichikawa (U.S. Patent No. 5,486,942). *See* Ex. 1003, ¶ 82; *see also* Ex. 1002, File History. Applicant responded that the rejections were not justified largely because Ichikawa disclosed use of shock mounts. Ex. 1003, ¶ 85. The Examiner next rejected Applicant's arguments and all pending claims. *Id.*, ¶ 86. In response, Applicant cancelled some pending claims, added six new claims, and argued that all of the claims were patentable. *Id.* The Examiner then rejected the claims as anticipated by Kim (U.S. Patent No. 6,151,207). *Id.*, ¶ 87. In response, Applicant cancelled, amended, and added some claims and argued that the pending claims were patentable largely because the remaining claims required threaded screw holes on the back of the LCD module. *Id.* The Examiner then rejected all pending claims as anticipated by Kim. *Id.*, ¶ 88. In response, Applicant cancelled and amended claims to require the screw to pass through a hole from the back side of the frame member to a threaded hole on the back of the LCD module. *Id.* On December 13, 2002 the

Examiner allowed the claims. *Id.*, ¶ 89. The Examiner cited reasons for allowing the claims because none of the references disclose at least one screw to fix the LCD module to the frame member by passing the screw through one hole in the frame member, subsequently screwing into the threaded screw hole on the back frame of the LCD module. Ex. 1008, Notice of Allowability, ¶ 2.

IV. Claim Construction

The Board construes claims under the same construction standard as civil actions in federal district court. The parties have not yet proposed constructions, nor has the court construed any terms in related district court litigations. Petitioners submit that for the purposes of this Petition, the Board does not need to explicitly construe any claim term, and there are no known claim construction disputes that affect the outcome of this Petition.¹

V. Detailed Discussion of the Grounds for Unpatentability

The Challenged Claims are unpatentable on two grounds. Ground 1 establishes that the '143 Patent claims 1-3 are anticipated by Kopish (Ex. 1004). To

¹ This claim-construction analysis is not a concession as to the scope of any claim term in litigation or a waiver of any argument in any proceeding that claim terms are indefinite, invalid, or unpatentable.

the extent that the claim 3 is not found anticipated, Ground 2 establishes that claim 2 is rendered obvious by Kopish in view of a POSITA's knowledge.

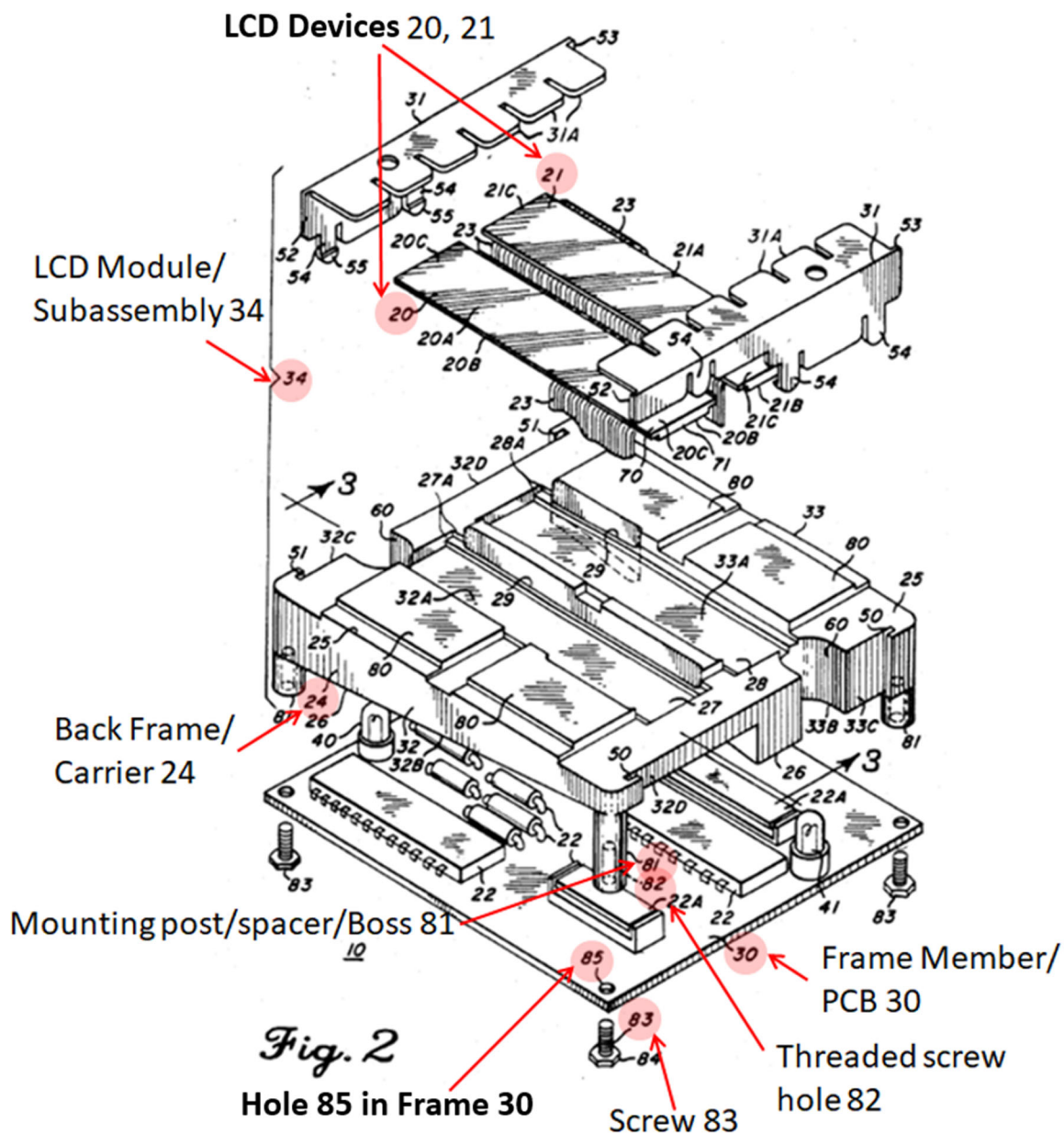
A. Overview of the Principal Prior Art

1. Kopish (Ex. 1004)

Kopish issued on July 5, 1988 as U.S. Patent No. 4,755,035 and is prior art under 35 U.S.C. § 102(b). Kopish was not considered during prosecution of the '143 Patent application. A copy of Kopish is submitted herewith as Ex. 1004.

Kopish explains the apparatus design by stating: "A pair of retainer clips 31 are illustrated in FIGS. 2 and 3 and are coupled to and join together the LCD devices 20 and 21 and the carrier 24 to form a snap together subassembly 34." Ex. 1004, 5:8-11. This carrier subassembly is an LCD module. Ex. 1003, ¶ 95. Kopish explains, "[a]s illustrated in the drawings, the carrier 24 has vertically downwardly extending mounting posts 81 each having a threaded center hole 82 therein. The posts 81 extend below the wedge portion bottom surface. A plurality of mounting screws 83 having head portions 84 and have body portions which pass through holes 85 in the printed circuit board 30 and effectively join the carrier 24 to the printed circuit board 30." Ex. 1004, 7:53-60. Kopish thus explains that the carrier 24 (which holds the LCD panels 20 and 21) is attached to the PCB 30 frame by screws that pass through holes 85 in the PCB 30 and screw into threaded holes 82 in mounting posts (bosses) 81 of the carrier 24. Ex. 1003, ¶ 97.

An Annotated Figure 2 of Kopish shown below is illustrative:



Ex. 1004, Fig. 2 (annotated).

Kopish presents its invention summary: “An object of the present invention is to provide an improved LCD display assembly which overcomes the above-

mentioned deficiencies of prior display assemblies.” *Id.*, 1:65-69. Kopish identifies the “above-mentioned complexities” as those present in typical LCD plate-type configurations that are electrically connected to driver electronics (Driver ICs). *Id.*, 1:14-24. “Generally the LCD is mounted in a display housing and is positioned within the housing by an LCD carrier to which the LCD is mounted . . . The carrier and LCD are then mounted to a printed circuit board, containing the LCD drive electronics, which is mounted to the display housing.” *Id.*, 1:25-33. However, this design causes design complexities requiring a number of individual parts. *Id.*, 1:33-37. Those complexities include, “numerous mounting structures” and requirements of “complex assembly,” since “until the LCD and carrier are mounted to the printed circuit board, a large number of assembly components are only loosely positioned in their appropriate places,” thus leading to further complication of design necessitating “additional light illumination sources,” which “would further complicate the LCD assembly.” *See id.*, 1:33-55.

Thus, Kopish seeks to alleviate these complexities through its embodiments. “In one embodiment of the present invention an LCD display assembly is provided. The display assembly comprises an LCD device having a general plate-type configuration . . . A carrier is provided which has top and bottom surfaces. The carrier top surface has a recessed portion within which the LCD device is positioned, and edges of the carrier recessed portion laterally surround the LCD device and

thereby laterally locate the LCD device with respect to the carrier. A retainer means is provided which is coupled to and joins together the LCD device and the carrier. The retainer means has extending portions which contact peripheral portions of the LCD top surface and bias the LCD device against the carrier.” *Id.*, 2:1-35. “[T]hreaded holes in mounting posts are provided in the carrier such that mounting screws subsequently mount the carrier subassembly, comprising the carrier, LCD devices and snap-on clips, to the printed circuit board assembly containing the drive electronics.” *Id.*, 3:42-47.

Thus, “[t]he above-noted configuration of components result in a simplified assembly for the present LCD display assembly invention.” *Id.*, 2:36-38. “This configuration readily permits illumination of the graphics with no substantial increase in display cost or complexity.” *Id.*, 2:50-3:4.

B. Ground 1: Claim 1 Is Anticipated by Kopish (Ex. 1004)

1. Claim 1

a. Preamble

The preamble of claim 1 recites “*An electric apparatus, comprising.*”

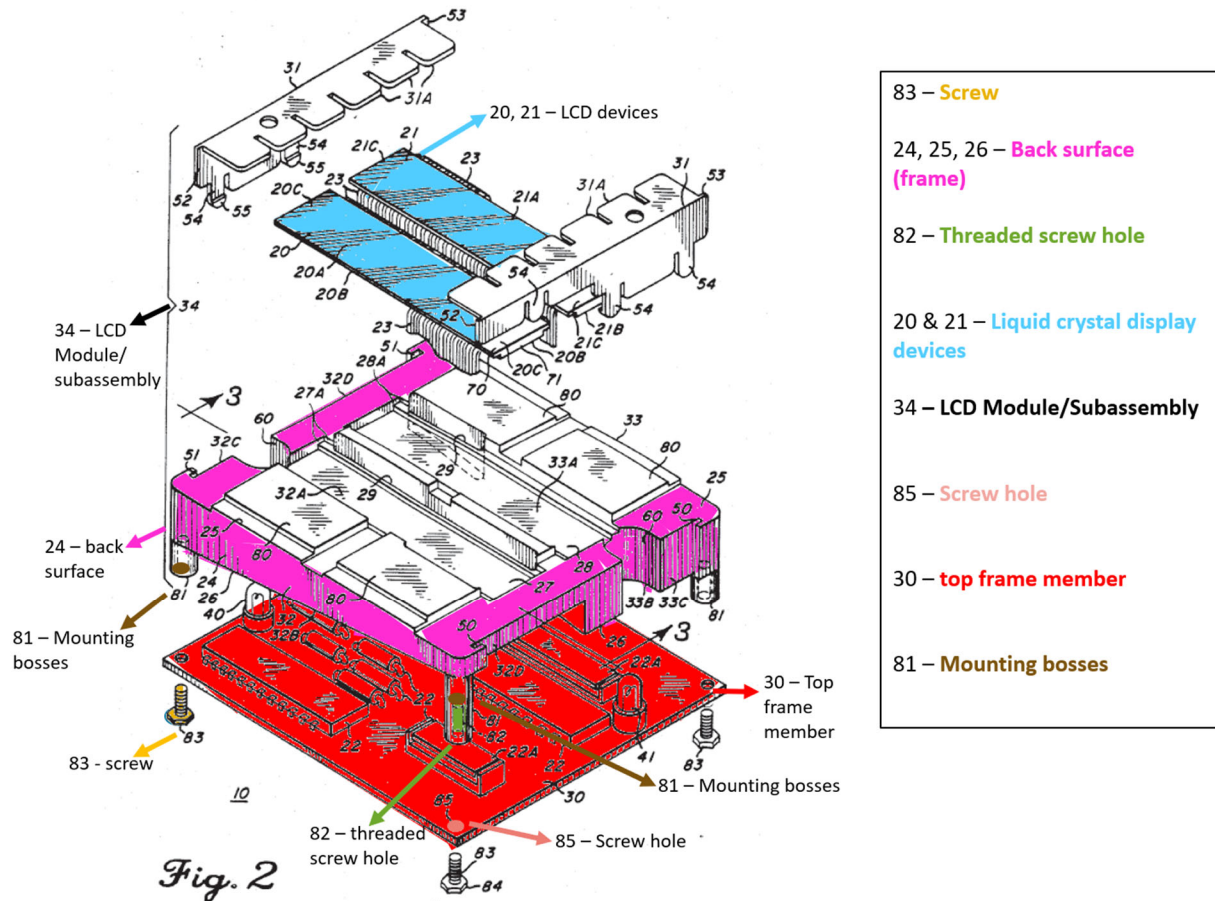
To the extent the preamble is determined to be limiting, Kopish discloses this limitation. Kopish in its Abstract says: “A display assembly for an LCD device” and also discloses that there are “drive electronics 22 positioned on the circuit board 30.” *Id.*, 5:7. If found limiting, then this limitation is disclosed Kopish. Ex. 1003, ¶ 105.

Thus, this preamble is disclosed by Kopish.

b. Limitation 1[a]

The '143 Patent's claim 1 continues by reciting “a frame member having at least one hole in a first predetermined location through which a screw can pass from a back side thereof.”

Kopish discloses this limitation. With reference to Kopish Figure 2 (copied below), PCB 30 (“frame member”) has hole 85 in a predetermined location through which screw 83 (“a screw”) passes from the back side of PCB 30.



Ex. 1004, Fig. 2 (annotated); see Ex. 1003, ¶ 102.

Specifically, and as shown, Kopish discloses a display assembly with a printed circuit board that acts as a top frame member (30); a screw hole (85); a liquid crystal display module (20 & 21); a carrier (24) for the liquid crystal display module having top (25) and bottom (26) surfaces that collectively act as a back frame; threaded screw holes (82); and mounting bosses (81) that act as spacers between screw and bottom framing. Ex. 1003, ¶¶ 101–103.

As pictured in Kopish Figure 2, component 30 is as a frame member that mounts to a carrier, thus eliminating “the need for additional mounting structure for the display assembly of the present invention.” Ex. 1004, 7:60-65; *see also* Ex. 1003, ¶ 102. Kopish teaches: “As illustrated in the drawings, the carrier 24 has vertically downwardly extending mounting posts 81 each having a threaded center hole 82 therein. The posts 81 extend below the wedge portion bottom surface. A plurality of mounting screws 83 having head portions 84 and have body portions which pass through holes 85 in the printed circuit board 30 and effectively join the carrier 24 to the printed circuit board 30.” Ex. 1004, 7:53-60; *id.*, 3:43-47; *see also* Ex. 1003, ¶ 103.

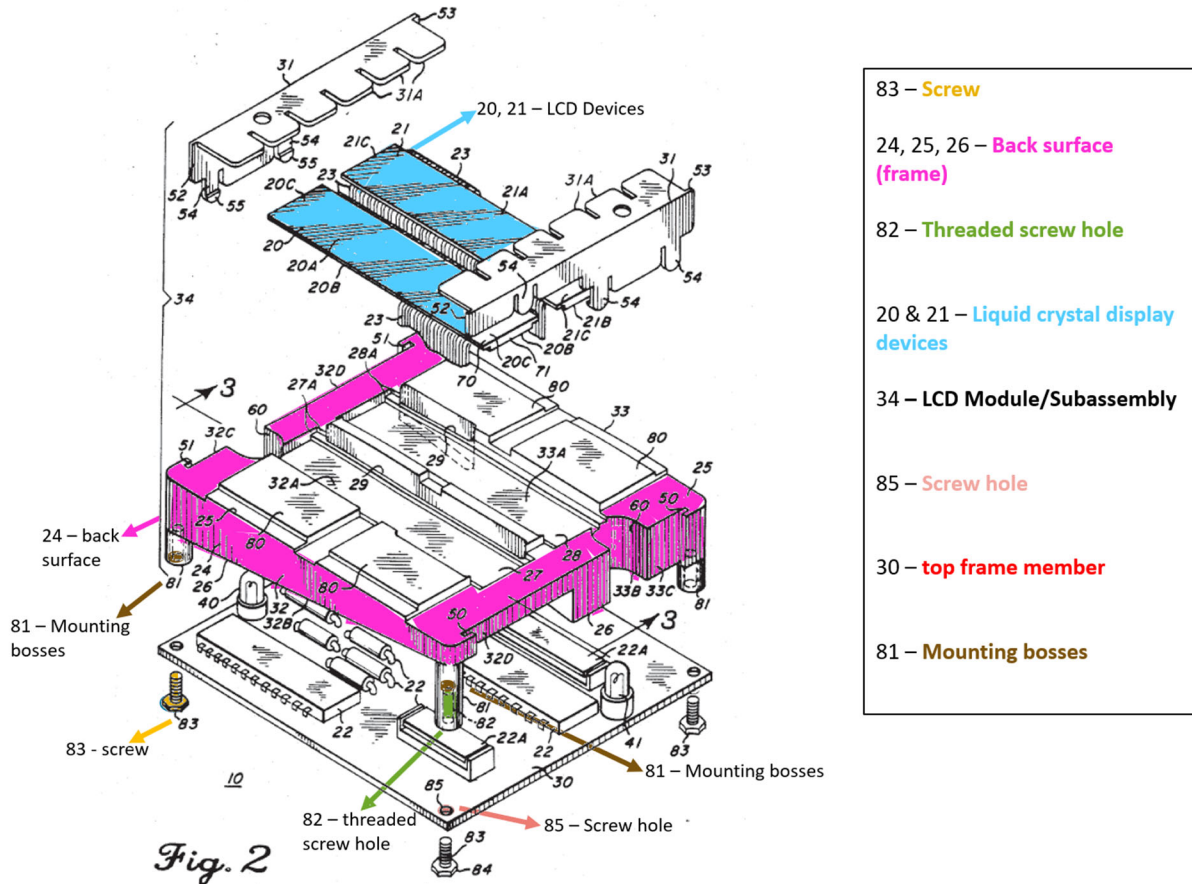
Thus, this limitation is disclosed by Kopish.

c. Limitation 1[b]

The '143 Patent's claim 1 continues by reciting “*a liquid crystal module having a liquid crystal display panel as a front display area and having a back frame*”

allowing said liquid crystal display module to be mounted to said frame member, said back frame including at least one threaded screw hole in a second predetermined location corresponding to said first predetermined location.”

Kopish discloses this limitation. With reference to Kopish Figure 2 (copied below), subassembly 34 including LCD devices 20 and 21 comprise “*a liquid crystal module having a liquid crystal display panel as a front display area*” that are mounted to the back frame (collectively components 24, 25, 26) to form a “*a liquid crystal module having a liquid crystal display panel as a front display area and having a back frame*” as claimed in the ’143 Patent’s claim 1. Ex. 1003, ¶ 104. This would allow LCD devices (“said liquid crystal display module”) to be mounted to the PCB 30 (“said frame member”). *Id.* The module features a second predetermined location of a threaded screw hole (81) that corresponds to the first aforementioned screw hole (85). *Id.* (“The back frame 24 allows the LCD module 34 to be mounted to the frame member/PCB 30. The back frame 24 includes a threaded screw hole 82 aligned with the first frame screw hole 85.”). Thus, “mounting screws 83 having head portions 84 and have body portions which pass through holes 85 in the printed circuit board 30 and effectively join the carrier 24 to the printed circuit board 30.” Ex. 1004, 7:53-60; *see also* Ex. 1003, ¶ 103.



Ex. 1004, Fig. 2 (annotated).

Further, Kopish discloses “said back frame including at least one threaded screw hole in a second predetermined location corresponding to said first pre-determined location.” See Ex. 1003, ¶ 105 (citing to Ex. 1004, Kopish, 7:53-60) (“As illustrated in the drawings, the carrier 24 has vertically downwardly extending mounting posts 81 each having a threaded center hole 82 therein. The posts 81 extend below the wedge portion bottom surface. A plurality of mounting screws 83 having head portions 84 and have body portions which pass through holes 85 in the printed circuit board 30 and effectively join the carrier 24 to the printed

circuit board 30.”)). “The back frame 24 includes a threaded screw hole 82 aligned with the first frame screw hole 85.” *Id.*, ¶ 104.

Thus, this limitation is disclosed by Kopish.

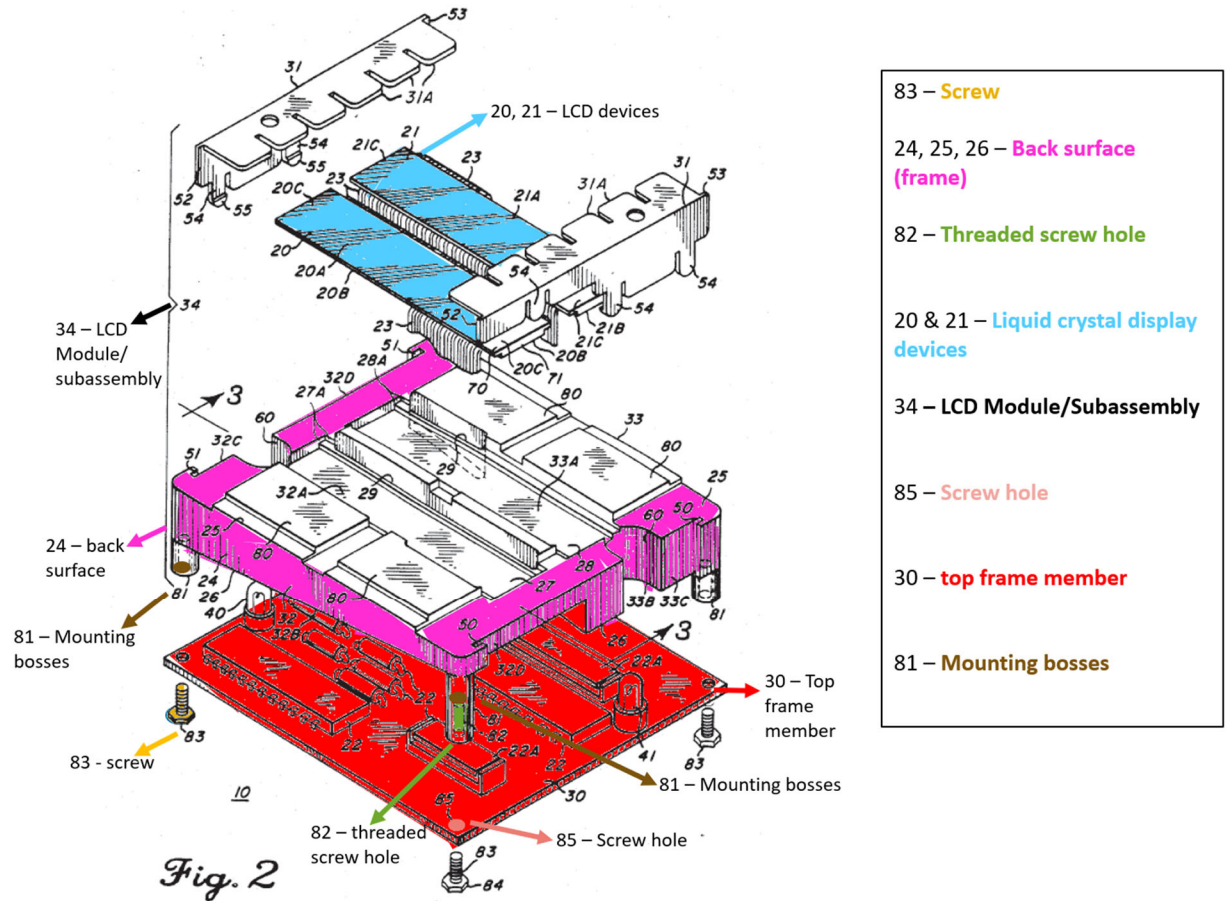
d. Limitation 1[c]

The ’143 Patent’s claim 1 continues by reciting “*at least one screw to fix said liquid crystal module to said frame member by passing through said at least one hole in said frame member from the back side thereof and screwing into said threaded screw hole on said back frame of said liquid crystal module.*”

Kopish discloses this limitation. With reference to Kopish Figure 2 (copied below), subcomponents of screw 83, screw hole 85, frame member/PCB 30, and screw hole 82 interact to comprise “*one screw to fix said liquid crystal module to said frame member by passing through said at least one hole in said frame member from the back side thereof and screwing into said threaded screw hole on said back frame of said liquid crystal module,*” as claimed in the ’143 Patent’s claim 1. *Id.*, ¶ 106.

As illustrated in Kopish Figure 2 (copied below), screw (83) is depicted as fixing the liquid crystal module (liquid crystal display devices 20 & 21 and back frame surface components 24, 25, 26) to the frame member (30) by passing through a hole on the back side of the frame member, screwing into the back frame of said liquid crystal module. *Id.*, ¶ 106. Kopish Figure 2 show the LCD module 34 fixed

to the frame member 30 by passing screw 83 through frame member hole 85 and screwing into threaded screw hole 82, which is in the mounting post 81 of the back frame 24. *Id.* This is further verified by Kopish: “As illustrated in the drawings, the carrier 24 has vertically downwardly extending mounting posts 81 each having a threaded center hole 82 therein. The posts 81 extend below the wedge portion bottom surface. A plurality of mounting screws 83 having head portions 84 and have body portions which pass through holes 85 in the printed circuit board 30 and effectively join the carrier 24 to the printed circuit board 30.” Ex. 1004, 7:53-60; Ex. 1003, ¶ 106.



Ex. 1004, Fig. 2 (annotated).

Thus, this limitation is disclosed by Kopish.

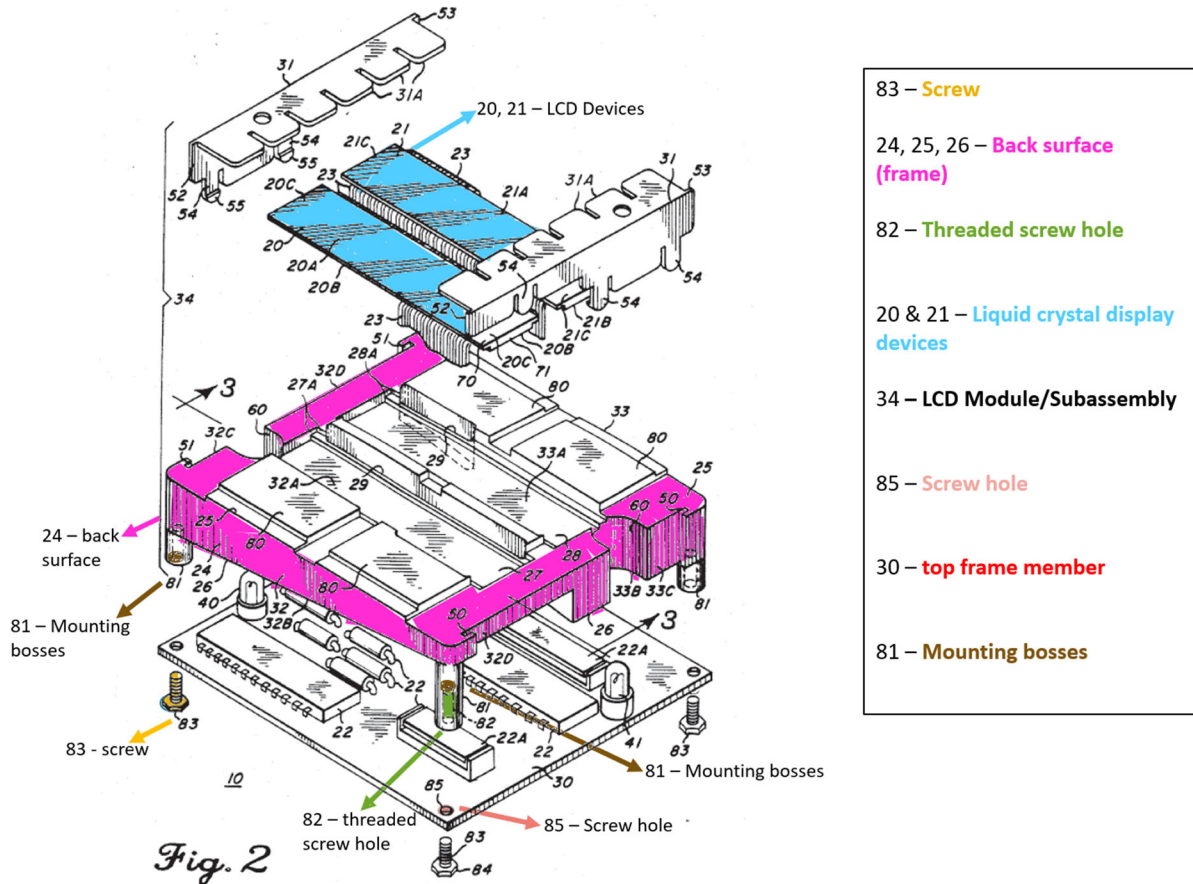
2. Claim 2

a. Limitation

The '143 Patent's claim 2 depends on claim 1 and further recites, "*The electric apparatus of claim 1, further comprising; at least one spacer through which at least one of said at least one screw passes through to join said liquid crystal module to said frame member.*"

Kopish discloses this limitation. With reference to Kopish Figure 2 (copied below), subcomponents of the mounting posts 81, frame member 85, back frame 24, LCD module 34, carrier 24, and others interact to comprise “*one spacer through which at least one of said at least one screw passes through to join said liquid crystal module to said frame member,*” as claimed in the ’143 Patent’s claim 2. Ex. 1003, ¶ 110.

As illustrated in Kopish Figure 2 (copied below), at least one spacer through which a screw passes through to join the liquid crystal module to the frame member is depicted. *Id.* As Kopish Figure 2 illustrates, the mounting posts 81 are spacers, positioned between the frame member 85 and the back frame 24 of the LCD module 34. *Id.* This is further verified by Kopish: “As illustrated in the drawings, the carrier 24 has vertically downwardly extending mounting posts 81 each having a threaded center hole 82 therein. The posts 81 extend below the wedge portion bottom surface. A plurality of mounting screws 83 having head portions 84 and have body portions which pass through holes 85 in the printed circuit board 30 and effectively join the carrier 24 to the printed circuit board 30.” Ex. 1004, 7:53-60. Kopish explains that the mounting posts 81 act as spacers compensating for the wedge shape of the back frame. *Id.*, 12:19-26; Ex. 1003, ¶¶ 109–113.



Ex. 1004, Fig. 2 (annotated).

Thus, this limitation is disclosed by Kopish.

3. Claim 3

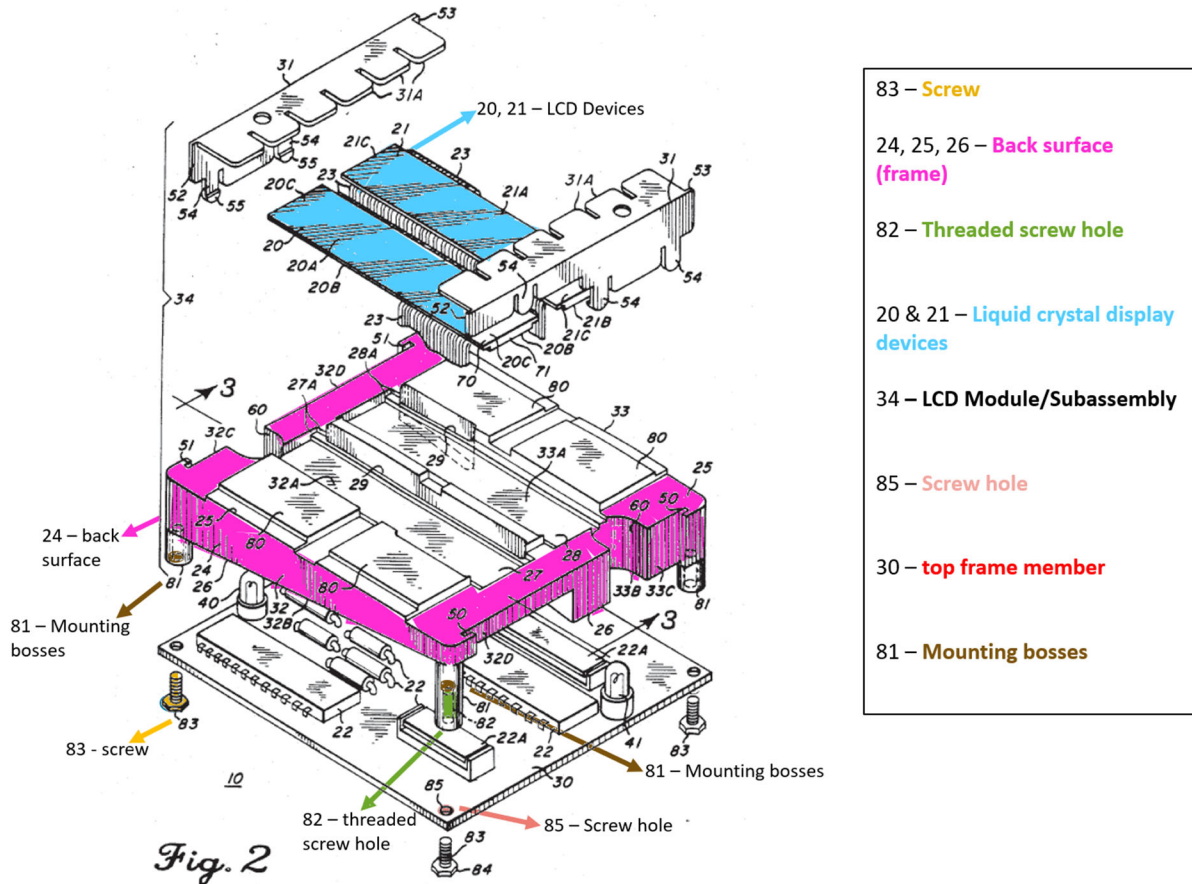
a. Limitation

The '143 Patent's claim 3 depends on claim 2 and further recites: "*The electric apparatus of claim 2; wherein said at least one spacer comprises a boss provided on a confronting face of said frame member.*"

Kopish discloses this limitation. With reference to Kopish Figure 2 (copied below), subcomponents of the mounting posts 81, frame member 85, back frame 24, LCD module 34, carrier 24, and others interact to comprise "*one spacer comprises*

a boss provided on a confronting face of said frame member,” as claimed in the ’143 Patent’s claim 3. Ex. 1003, ¶ 115.

As illustrated in Kopish Figure 2 (copied below), a spacer comprising a boss provided on a confronting face of the frame member is depicted. *Id.* As can be seen in Figure 2, the mounting posts 81 act as spacers and are bosses extending down vertically from the back frame 24. *Id.* Kopish explains that by using such bosses, separate spacers are eliminated: “In this manner, the molded carrier 24 provides mounting posts which assist in mounting the carrier to its associated printed circuit board 30. This eliminates the need for additional mounting structure for the display assembly of the present invention. In addition, by providing the carrier 24 as a unitary molded part, separate spacers to position the carrier with respect to the display cover plate 13 can be eliminated.” *Id.*, ¶¶ 114–118 (citing Ex. 1004, 7:60-68).



Ex. 1004, Fig. 2 (annotated).

As previously explained and as seen in Figure 2 above, the mounting post/bosses 81 align with the frame member screw holes (85), so back frame (24) can be securely attached to the frame member (30) with screws (83). These screws (83) are tightened to secure the back frame (24) and LCD module (34) to the frame member (30) via the boss (81), which is in intimate tight contact with the frame member (30). Ex. 1003, ¶ 116. That is, the boss is “provided on a confronting face of said frame member.” *Id.*

Thus, this limitation is disclosed by Kopish.

C. Ground 2: Obviousness under 35 U.S.C. § 103 over Kopish (Ex. 1004) and Background Knowledge of POSITA

1. Claim 3

a. Limitation

The '143 Patent's claim 3 depends on claim 2 and further recites: "*The electric apparatus of claim 2; wherein said at least one spacer comprises a boss provided on a confronting face of said frame member.*"

To the extent Kopish is not found to anticipate claim 3, Kopish in view of a POSITA's knowledge renders claim 3 obvious. As previously explained, Kopish discloses mounting bosses 81 that act as spacers and are bosses extending down vertically from the back frame 24 onto a confronting face of frame member 30 when assembled. To the extent that patent owner argues that said bosses disclosed in Kopish are not provided "*on a confronting face of said frame member*", a POSITA would have found it obvious to modify Kopish's teachings of mounting bosses (81) extending from back frame (24) to extending them from the frame member (30). Ex. 1003, at ¶ 119. "When there is a design need or market pressure to solve a problem and there are a finite number of identified, predictable solutions, a person of ordinary skill has good reason to pursue the known options within his or her technical grasp." *KSR Int'l Co. v. Teleflex Inc.*, 550 U.S. 398, 421 (2007). A POSITA would have recognized that in the present case, there are only two options of the orientation for

the mounting bosses (81). The first option is for the mounting bosses (81) to extend from the frame member (30). Ex. 1003, at ¶ 120. The only other option is for mounting bosses (81) to extend from the back frame (24), as shown in Kopish Figure 2. Ex. 1003, at ¶ 120. A POSITA could implement either option as a simple matter of design choice without undue experimentation and either implementation would result in predictable results. *Id.*

A POSITA would also be motivated to modify Kopish's design to extend the bosses from the frame member 30. Extending the bosses from the frame member (30), results in an LCD module / subassembly (34) that is more lightweight in design, as it would not need to also include separate bosses. Ex. 1003, at ¶ 121. Such relief from extra weight and complexity would protect sensitive electronic components, such as LCD devices (20 and 21). Ex. 1003, at ¶ 121. Utilizing a less complex design is an important consideration in Kopish which seeks to improve prior art designs that are "relatively complex and require a number of individual parts." Ex. 1004, 1:33-35.

D. No Secondary Considerations Exist

No secondary indicia of nonobviousness exist. Petitioners reserve the right to respond to any assertion of secondary indicia of nonobviousness advanced by Patent Owner.

VI. Mandatory Notices

A. Real Parties-in-Interest

Petitioners are the only entities funding and controlling this Petition and are therefore the named real parties-in-interest. The following Hisense entities were also named in the “Related Proceeding” identified herein at Section VI.B: Hisense Co. Ltd.; Hisense Visual Technology Co. Ltd.; Hisense Electronica Mexico S.A. de C.V.; Hisense Import & Export Co. Ltd.; Hisense International Co. Ltd.; Hisense International (HK) Co. Ltd.; and Hisense Electronica Mexico S.A. de C.V.² Out of abundance of caution, these additional named Hisense defendants are identified as potential real parties-in-interest for the purposes of this Petition.

B. Related Proceedings

Patent Owner asserted the ’143 Patent against Petitioners in the Eastern District of Texas, Case No. 2:21-cv-00262 (lead case).

C. Lead and Backup Counsel

Petitioners’ lead and backup counsel are:

² To Petitioners’ knowledge, none of these Hisense entities was served with a copy of a complaint alleging infringement of the Challenged Claims more than one year before the filing of this Petition. Named codefendant Xianyang Caihong Optoelectronics Technology Co., Ltd. (CHOT) is not affiliated with Petitioners.

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D. Electronic Service

Petitioners consent to electronic service at:

Winston-Hisense-IPR@winston.com.

VII. Fees

The required fee is being paid electronically through P-TACTS.

VIII. Conclusion

Petitioners respectfully request that the Board institute IPR and enter a final written decision finding the Challenged Claims unpatentable.

Dated: March 17, 2023

Respectfully submitted,

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CERTIFICATE OF COMPLIANCE

This Petition complies with the word count limits set forth in 37 C.F.R. § 42.24(a)(1)(i), because this Petition contains less than 14,000 words, excluding the parts of the Petition exempted by 37 C.F.R. § 42.24(a)(1) and determined using the word count provided by Microsoft Word, which counsel used to prepare this Petition.

CERTIFICATE OF SERVICE

Under 37 C.F.R. §§ 42.6(e) and 42.105(a), this is to certify that on March 17, 2023, I caused to be served a true and correct copy of the foregoing “**PETITION FOR *INTER PARTES* REVIEW OF U.S. PATENT NO. 6,594,143**” and Exhibits 1001–1009 by Federal Express on the Patent Owner at the correspondence address of record for U.S. Patent No. 6,594,143:

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A courtesy copy of this Petition and supporting material was also served on litigation counsel for Patent Owner via email:

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Dated: March 17, 2023

/s/ Ya-Chiao Chang /
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