

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

HISENSE USA CORP.,

Petitioner,

v.

LIGHT GUIDE INNOVATIONS LLC,

Patent Owner.

Patent No. 8,267,537

Filing Date: June 26, 2009

Issue Date: September 18, 2012

Inventor: Jun Seok Park

Title: BACKLIGHT UNIT AND DISPLAY DEVICE HAVING THE SAME

PATENT OWNER'S PRELIMINARY RESPONSE

Case No. IPR2025-01538

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LIST OF EXHIBITS

Exhibit No.	Description of Document
2001	Docket Control Order (Dkt. 31) in <i>Light Guide Innovations LLC v. Walmart Inc.</i> , Case No. 2-25-cv-00312-RWS-RSP (Lead Case); <i>Light Guide Innovations v. Hisense Co.</i> , Case No. 2:25-cv-00051-RWS-RSP (Member Case) dated August 4, 2025 (E.D. Tex.)
2002	Complaint for Patent Infringement (Dkt. 1) in <i>Light Guide Innovations v. Hisense Co.</i> , Case No. 2:25-cv-00051-RWS-RSP dated January 17, 2025 (E.D. Tex.)
2003	Hisense Defendants' Invalidity and Subject Matter Eligibility Contentions in <i>Light Guide Innovations LLC v. Walmart Inc.</i> , Case No. 2-25-cv-00312-RWS-RSP (Lead Case); <i>Light Guide Innovations v. Hisense Co.</i> , Case No. 2:25-cv-00051-RWS-RSP (Member Case) dated September 22, 2025

I. INTRODUCTION

On September 16, 2025, Hisense USA Corp. (“Petitioner”) submitted a Petition (Paper 1, “Petition” or “Pet.”) requesting *inter partes* review (“IPR”) of U.S. Patent No. 8,267,537 (Ex. 1001, the “’537 Patent”). The Petition challenges Claims 1-20 (the “Challenged Claims”). The Declaration of Dr. Michael Krames (Ex. 1002) accompanied the Petition. On September 22, 2025, the Board issued a Notice of Filing Date Accorded for the Petition and set the time for filing patent owner’s preliminary response. Paper 3.

The Board should deny Hisense’s Petition because it fails to show that the asserted references disclose or render obvious a “*case* supporting the LED module” as required by every Challenged Claim.

II. ARGUMENT

A. Ground 1 – Petitioner Fails to Show Disclosure of the Claimed “*case* supporting the LED module”

Ground 1 of the Petition asserts that independent Claims 1 and 13 are obvious over Taiwan Patent No. TWI248538 (Ex. 1007, certified translation at Ex. 1003) (“Liu”). However, the Petition fails to show that Liu discloses or renders obvious a “*case* supporting the LED module,” as required by both claims.

The Petition conclusorily asserts that Liu’s discussion of a “backboard” satisfies the “*case*” limitation in the context of both Claims 1 and 13. Pet. at 13-14,

30-32. But the Petition completely fails to articulate how a “backboard” discloses a “case,” and fails to even assert that Liu’s backboard encases anything. Moreover, the only depiction of Liu’s backboard in Petitioner’s arguments against this limitation is a flat piece 306 behind board 304 in Liu’s Figure 5. Nothing in this illustration or Petitioner’s arguments explains how a flat backboard could be a case, or otherwise encase anything.

To the extent that the Petition intended to suggest that any flat material is automatically a “case,” it has neither disclosed that argument, nor adopted any claim construction necessary to support that argument. To the contrary, the Petition states that “no formal claim constructions are necessary.” Pet. at 4. Petitioner has further failed to meet its burden to show unpatentability on this basis. *See Samsung Elecs. Co., v. Slyde Analytics, LLC*, IPR2024-00041, Paper 12 at 21 (P.T.A.B. Apr. 9, 2024) (“We decline to engage in such speculation, because it is ‘the ***petitioner who has the burden*** from the onset to show with particularity why the patent it challenges is unpatentable.’ Given the lack of any meaningful proposed claim construction for the claim 1 terms . . . Petitioner has not met its burden here.”) (citing *Harmonic Inc. v. Avid Tech., Inc.*, 815 F.3d 1356, 1363 (Fed. Cir. 2016)).

Because the Petition fails to show that Liu discloses or renders obvious the claimed “case supporting the LED module,” whether under the terms plain and

ordinary meaning or any implicit claim construction, institution should be denied.

B. Grounds 2 and 3 Suffer From the Same Defects as Ground 1

Grounds 2 and 3 challenge only dependent claims and rely on the Petition's arguments from Ground 1 against independent Claims 1 and 13. Accordingly, they suffer from the same defects as Ground 1 discussed above, and institution should be denied on the same basis.

III. CONCLUSION

As discussed above, Hisense's combinations fail to disclose or render obvious key limitations of the '537 Patent, and therefore, do not anticipate or render obvious any claims. Institution should be denied.

Respectfully submitted,

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CERTIFICATE OF WORD COUNT

The undersigned hereby certifies that the portions of the above-captioned PATENT OWNER'S PRELIMINARY RESPONSE has 548 words in compliance with the 14,000 word limit set forth in 37 C.F.R. § 42.24. This word count was prepared using Microsoft Word for Office 365.

Respectfully submitted,

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CERTIFICATE OF SERVICE

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