

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: 2018-01377

U.S. PATENT NO. 9,281,405 B2

PETITION FOR *INTER PARTES* REVIEW

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List of Exhibits

- Ex. 1001 United States Letters Patent No. 9,281,405 B2
- Ex. 1002 Prosecution history of U.S. Patent No. 9,281,405 B2
- Ex. 1003 Declaration of Richard A. Flasck
- Ex. 1004 United States Patent Application Publication No. 2011/0193081 A1
(“*Godo*”)
- Ex. 1005 United States Patent Application Publication No. 2008/0299693 A1
(“*Toyota*”)

I. INTRODUCTION

BlueHouse Global Ltd. (“Petitioner”) hereby petitions for *inter partes* review of claims 10, 11, 15 and 16 (the “challenged claims”) of U.S. Patent No. 9,281,405 (“the ‘405 Patent”; Ex. 1001) under 35 U.S.C. §§ 311–319 and 37 C.F.R. § 42. According to the assignment information on the front of the ‘405 Patent, and the records of the United States Patent & Trademark Office (the “USPTO”), the ‘405 Patent is assigned to, and therefore owned by, Semiconductor Energy Laboratory Co., Ltd. (the “Patent Owner”). For the reasons provided in detail below, the challenged claims should be found unpatentable and canceled.

II. MANDATORY NOTICES (37 C.F.R. § 42.8)

A. Real Parties-In-Interest (37 C.F.R. § 42.8(b)(1))

The real parties-in-interest in this matter are Petitioner BlueHouse Global Ltd. and its parent company, Caesar Global Fund.

B. Related Matters (37 C.F.R. § 42.8(b)(2))

As of the filing date of this Petition, Petitioner is unaware of any matters involving the ‘405 Patent pending in any United States court or administrative agency.

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