

**UNITED STATES INTERNATIONAL TRADE COMMISSION
WASHINGTON, D.C.**

**Before The Honorable Monica Bhattacharyya
Administrative Law Judge**

In the Matter of

**CERTAIN OUTDOOR AND SEMI-
OUTDOOR ELECTRONIC
DISPLAYS, PRODUCTS
CONTAINING SAME, AND
COMPONENTS THEREOF**

Inv. No. 337-TA-1331

RESPONDENTS' PRE-HEARING BRIEF

[REDACTED]

enclosed in the housing. *Id.* ¶ 113. A POSITA would need to consider the fact that wind, air, debris, and precipitation could enter the alleged channel through the alleged exit when designing the rest of the display. *Id.* ¶ 114; RX-1142; RX-1140. For example, [REDACTED]

[REDACTED]

[REDACTED], but if the alleged constricted convection plate were entirely distinct from the housing, a POSITA would not have had that concern. *Id.*

The evidence will show that [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]. Neikirk Rpt. ¶ 117; JX-0213C.

Therefore, the Samsung OH46/55 Accused Products do not directly infringe this limitation. Because there is no direct infringement, MRI cannot establish that Samsung Electronics induces infringement of this claim.

- iii. two side panels placed adjacent to the constricted convection plate and posterior display surface” (Claim Element 1[c])

The Samsung OH46/55 Accused Products, the Coates Accused Products, and the Palmer Accused Products do not satisfy claim element 1[c], which requires “two side panels placed adjacent to the constricted convection plate and posterior display surface.”

Mr. Credelle identifies [REDACTED]

[REDACTED] Credelle Op. Rpt. ¶¶ 114-15; Credelle Tr. at 157:2-158:4. The evidence will show that a POSITA would [REDACTED]

[REDACTED]

Dated: June 5, 2023

/s/ Patrick J. McCarthy

Patrick J. McCarthy

Annaka Nava

Jacqueline Genovese Bova

Jeremy Jones

Goodwin Procter LLP

1900 N Street, N.W.

Washington, D.C. 20036

Telephone: 202-346-4000

Facsimile: 202-346-4444

PMcCarthy@goodwinlaw.com

ANava@goodwinlaw.com

JeremyJones@goodwinlaw.com

jbova@goodwinlaw.com

Darryl M. Woo

Goodwin Procter LLP

Three Embarcadero Center

San Francisco, CA 94111-4003

Telephone: 415-733-6000

Facsimile: 415-677-9041

DWoo@goodwinlaw.com

Yoona Lee

Elizabeth J. Low

Goodwin Procter LLP

601 Marshall St.

Redwood City, CA 94063

Telephone: 650-752-3100

Facsimile: 650-853-1038

YoonaLee@goodwinlaw.com

ELow@goodwinlaw.com



Srikanth K. Reddy
Douglas J. Kline
Christie L. Larochelle
Harrison Gunn
Goodwin Procter LLP
100 Northern Avenue
Boston, MA 02210
Telephone: 617-570-1000
Facsimile: 617-523-1231
SReddy@goodwinlaw.com
DKline@goodwinlaw.com
CLarochelle@goodwinlaw.com
HGunn@goodwinlaw.com

Naomi L. Birbach
Christine Potkay
Cristina Denise Go
Goodwin Procter LLP
The New York Times Building
620 Eighth Avenue
New York, New York 10018-1405
Telephone: 212-813-8800
Facsimile: 212-355-3333
NBirbach@goodwinlaw.com
CPotkay@goodwinlaw.com
DGo@goodwinlaw.com

Counsel for Respondents
Samsung Electronics Co., Ltd., Samsung
Electronics America, Inc., Samsung SDS Co.
Ltd., Samsung SDS America, Inc., Industrial
Enclosures Corporation d/b/a Palmer Digital
Group, Coates Signco Pty Limited and Coates
US Inc.