EXHIBIT 1011

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

LG Electronics Inc., Plaintiff, v. TCL Electronics Holdings Ltd. (f/k/a TCL Multimedia Technology Holdings, Ltd.); TCL Industries Holdings Co., Ltd.; TCL Industries Holdings (H.K.) Limited; TTE Technology, Inc. (d/b/a TCL North America); TTE Corporation; TCL Moka International Limited; TCL Moka Manufacturing S.A. de C.V.; TCL King Electrical Appliances (Huizhou) Co. Ltd.; Manufacturas Avanzadas S.A. de C.V.; TCL Smart Device (Vietnam) Co., Ltd.; Shenzhen TCL New Technology Co., Ltd.; TCL Optoelectronics Technology (Huizhou) Co., Ltd.; TCL Overseas Marketing Ltd.; and TCL Technology Group Corporation (f/k/a TCL Corp.), Defendants.	Civil Action No. 2:22-cv-00122 **PLAINTIFF LG ELECTRONICS INC.'S PATENT L.R. 3-1 AND 3-2 DISCLOSURE OF ASSERTED CLAIMS AND INFRINGEMENT CONTENTIONS**

PLAINTIFF'S LOCAL PATENT RULES 3-1 AND 3-2 DISCLOSURES

Plaintiff LG Electronics Inc. (hereinafter, "LGE" or "Plaintiff"), pursuant to Local Patent Rule 3-1 and Local Patent Rule 3-2 and the Scheduling Orders entered in this case (Dkt. No. 41), submits its Disclosure of Asserted Claims, Infringement Contentions, and contentions regarding LGE products, as well as the required document production with respect to Defendants TCL Electronics Holdings Ltd. (f/k/a TCL Multimedia Technology Holdings, Ltd.); TCL Industries Holdings Co., Ltd.; TCL Industries Holdings (H.K.) Limited; TTE Technology, Inc. (d/b/a TCL North America); TTE Corporation; TCL Moka International Limited; TCL Moka Manufacturing S.A. de C.V.; TCL King Electrical Appliances (Huizhou) Co. Ltd.; Manufacturas Avanzadas S.A.

de C.V.; TCL Smart Device (Vietnam) Co., Ltd.; Shenzhen TCL New Technology Co., Ltd.; TCL Optoelectronics Technology (Huizhou) Co., Ltd.; TCL Overseas Marketing Ltd.; and TCL Technology Group Corporation (f/k/a TCL Corp.) (collectively "TCL" or "Defendants").

I. INTRODUCTION

Based on LGE's review of publicly available information and an analysis of Defendants' accused systems and methods, LGE presents these Infringement Contentions. In making these disclosures and preliminary infringement contentions, LGE notes that it has not yet received any discovery from any Defendant regarding their accused products, or their methods and systems. Accordingly, all information contained in this Disclosure and accompanying Exhibits is the result of publicly available information and independent examination and analysis of the accused instrumentalities of each Defendant. Certain information about the operation of such accused instrumentalities is not available without engaging in further discovery.

Accordingly, LGE reserves the right to modify, amend, and/or supplement any of its Disclosures of Asserted Claims and Infringement Contentions to the extent permitted by the Federal Rules of Civil Procedure, the Local Patent Rules of this Court, and any Order of this Court. LGE specifically reserves the right to modify, amend, and/or supplement any of its identification of asserted claims and/or infringement contentions due not only to discovery obtained from any Defendants, but also discovery obtained from any third parties, voluntary disclosures by any Defendants or third parties, any of Defendants' contentions and pleadings/briefs/declarations (and exhibits thereto), the issuance of a claim construction ruling by the Court, or for any other reason permitted under the Federal Rules of Civil Procedure and/or the Local Patent Rules of this Court and/or any Order of this Court.

II. LOCAL PATENT RULE 3-1 DISCLOSURES AND CONTENTIONS

A. CLAIMS INFRINGED (Local Patent Rule 3-1(a))

Pursuant to Local Patent Rule 3-1(a), LGE identifies the following patents (hereinafter, the "Patents-in-Suit") and the following claims of the Patents-in-Suit (hereinafter, "Asserted Claims") that the Defendants have infringed and continue to infringe:

U.S. Patent No.	Title	Asserted Claims
7,982,803 (the "'803 patent")	Audio and Video Synchronizing Apparatus and Method	1, 2, 6-10, 13, 14, 16
7,839,452 (the "'452 patent")	Image Display Device in Digital TV	1-3, 5-17, 19-21, 23
10,334,311 (the "'311 patent")	Method of Providing External Device List and Image Display Device	1, 3, 4, 5, 7, 9, 10, 11, 12, 14, 15, 16, 18, 20, 21
9,080,740 (the "'740 patent")	Planar Lighting Device	1-3, 7-29, 31
9,788,346 (the "'346 patent")	Channel Access Method for Very High Throughput (VHT) Wireless Local Access Network System and Station Supporting the Channel Access Method	9-10, 12-14, 16
10,499,431 (the "'431 patent")	Channel Access Method for Very High Throughput (VHT) Wireless Local Access Network System and Station Supporting the Channel Access Method	1-2, 4-5, 7-8, 10-11, 13-16

B. ACCUSED INSTRUMENTALITIES (Local Patent Rule 3-1(b))

1. U.S. Patent No. 7,982,803

For U.S. Patent No. 7,982,803, the Accused Instrumentalities include TCL televisions that include an infringing audio passthrough feature, including but not limited to the TCL model numbers identified in the chart below. Each of the Accused Instrumentalities identified in the chart below infringes claims 1, 2, 6-10, 13, 14, and 16 of the '803 patent, as explained in more detail in

LGE's Patent L.R. 3-1(c) Disclosures and attached claims charts. LGE also accuses all other TCL televisions (made, used, sold, imported, or offered for sale by or for TCL during the damages period for the '803 patent) that are insubstantially different (or which have substantially the same structure and/or operation and achieve substantially the same function and/or result), with respect to the asserted claims of the '803 patent, from any of the TCL model televisions set forth below.

Series	Model(s)
3-Series	32S331; 32S335
4-Series	43S435; 50S435; 55S435; 65S435; 75S435; 85S435; 43S431; 50S431; 55S431; 65S431; 75S431; 43S433; 75S433; 43S455; 55S455; 65S455; 75S455; 50S455; 55S21
5-Series	55S531; 65S531; 50S535; 55S535; 65S535; 75S535
6-Series	55R635; 65R635; 75R635; 65R648; 75R648
7-Series	85R745

2. U.S. Patent No. 7,839,452

For U.S. Patent No. 7,839,452, each of the Accused Instrumentalities identified in Chart 452A below infringes claims 1-3, 5, 7, 9-12, 14, 16, 17, 19-21, and 23 of the '452 patent, and each of the Accused Instrumentalities identified in Chart 452B below infringes claims 6, 8, 13, and 15 of the '452 patent. The Accused Instrumentalities include all TCL televisions that include the infringing 4K upscaling operation, including but not limited to the TCL model numbers identified in the chart below. The infringement of claims 1-3, 5-17, 19-21, and 23 of the '452 patent is

explained in more detail in LGE's Patent L.R. 3-1(c) Disclosures and attached claims charts. LGE also accuses all other TCL televisions (made, used, sold, imported, or offered for sale by or for TCL during the damages period for the '452 patent) that are insubstantially different (or which have substantially the same structure and/or operation and achieve substantially the same function and/or result), with respect to the asserted claims of the '452 patent, from any of the TCL model televisions set forth below.

Chart 452A – Accused Instrumentalities for Claims 1-3, 5, 7, 9-12, 14, 16, 17, 19-21, and 23

Series	Model(s)
4-Series	43S403; 43S405; 43S421; 43S423; 43S425; 43S431; 43S433; 43S434; 43S435; 43S446; 43S455; 49S403; 49S405; 49S425; 50S421; 50S423; 50S425; 50S431; 50S434; 50S435; 50S446; 50S455; 55S20; 55S21; 55S401; 55S403; 55S405; 55S421; 55S423; 55S425; 55S431; 55S433; 55S434; 55S435; 55S446; 55S455; 65S401; 65S403; 65S405; 65S421; 65S423; 65S425; 65S431; 65S434; 65S435; 65S446; 65S455; 70S430; 70S434; 75S421; 75S423; 75S425; 75S431; 75S433; 75S434; 75S435; 75S446; 75S455; 85S435; 85S446
5-Series	43S513;43S515; 43S517; 43S525; 49S513; 49S515; 49S517; 50S525; 50S535; 50S546; 55S513; 55S515; 55S517; 55S525; 55S531; 55S535; 55S546; 65S513; 65S515; 65S517; 65S525; 65S531; 65S535; 65S546; 75S535; 75S546
6-Series	55R613; 55R615; 55R617; 55R625; 55R635; 55R646; 65R615; 65R617; 65R625; 65R635; 65R646; 75R615; 75R617; 75R635; 75R646
7-Series	85R745

8-Series	65Q825; 75Q825.

Chart 452B – Accused Instrumentalities for Claims 6, 8, 13 and 15

Series	Model(s)
4-Series	43S403; 43S405; 43S421 ; 43S423; 43S425; 43S431; 43S433; 43S435; 43S455; 49S403; 49S405; 49S425; 50S421; 50S423; 50S425; 50S431; 50S435; 50S455; 55S20; 55S21; 55S401; 55S403; 55S405; 55S421; 55S423; 55S425; 55S431; 55S433; 55S435; 55S455; 65S401; 65S403; 65S405; 65S421; 65S423; 65S425; 65S431; 65S435; 65S455; 75S421; 75S423; 75S425; 75S431; 75S433; 75S435; 75S455; 85S435
5-Series	43S513; 43S515; 43S517; 43S525; 49S513; 49S515; 49S517; 50S525; 50S535; 55S513; 55S515; 55S517; 55S525; 55S531; 55S535; 65S513; 65S515; 65S517; 65S525; 65S531 ; 65S535; 75S535
6-Series	55R613; 55R615; 55R617; 55R625; 55R635; 65R615; 65R617; 65R625; 65R635; 75R615; 75R617; 75R635
7-Series	85R745
8-Series	65Q825; 75Q825

3. <u>U.S. Patent No. 10, 334,311</u>

For U.S. Patent No. 10,334,311, each of the Accused Instrumentalities identified in the chart below infringes all of the asserted claims of the ’311 patent as identified above in section 3-

1(a). The Accused Instrumentalities include TCL Roku television models which include the infringing icon feature, including but not limited to the model numbers identified in the chart below. Each of the Accused Instrumentalities identified in the chart below infringes claims 1, 3, 4, 5, 7, 9, 10, 11, 12, 14, 15, 16, 18, 20, and 21 of the ’311 patent, as explained in more detail in LGE’s Patent L.R. 3-1(c) Disclosures and attached claims charts. LGE also accuses all other TCL televisions (made, used, sold, imported, or offered for sale by or for TCL during the damages period for the ’311 patent) that are insubstantially different (or which have substantially the same structure and/or operation and achieve substantially the same function and/or result), with respect to the asserted claims of the ’311 patent, from any of the TCL model televisions set forth below.

Series	**Model(s)**
3-Series	28S305; 32S305; 32S321; 32S323; 32S325; 32S327; 32S331; 32S335; 40S305; 40S325; 43S305; 43S325; 49S305; 49S325
4-Series	43S403; 43S405; 43S421; 43S423; 43S425; 43S431; 43S433; 43S435; 43S455; 49S403; 49S405; 49S425; 50S421; 50S423; 50S425; 50S431; 50S435; 50S455; 55S20; 55S21; 55S401; 55S403; 55S405; 55S421; 55S423; 55S425; 55S431; 55S433; 55S435; 55S455; 65S401; 65S403; 65S405; 65S421; 65S423; 65S425; 65S435; 75S421; 75S423; 75S425; 75S431; 75S433; 75S435; 75S455; 85S435
5-Series	43S513; 43S515; 43S517; 43S525; 49S513; 49S515; 49S517; 50S525; 50S535; 55S513; 55S515; 55S517; 55S525; 55S531; 55S535; 65S513; 65S515; 65S517; 65S535; 75S535

6-Series	55R613; 55R615; 55R617; 55R625; 55R635; 65R615; 65R617; 65R625; 65R635; 65R648; 75R615; 75R617; 75R635
7-Series	85R745
8-Series	65Q825

4. U.S. Patent No. 9,080,740

For U.S. Patent No. 9,080,740, each of the Accused Instrumentalities identified in Chart 740A below infringes claims 1 and 7-21 of the ’740 patent, each of the Accused Instrumentalities identified in Chart 740B below infringes claims 2-3 and 22-29 of the ’740 patent, and each of the Accused Instrumentalities identified in Chart 740C below infringe claim 31 of the ’740 patent. The Accused Instrumentalities include TCL televisions with infringing backlight structures, including but not limited to the model numbers identified in the chart below. The infringement of claims 1-3, 7-29, and 31 of the ’740 patent is explained in more detail in LGE’s Patent L.R. 3-1(c) Disclosures and attached claims charts. LGE also accuses all other TCL televisions (made, used, sold, imported, or offered for sale by or for TCL during the damages period for the ’740 patent) that are insubstantially different (or which have substantially the same structure and/or operation and achieve substantially the same function and/or result), with respect to the asserted claims of the ’740 patent, from any of the TCL model televisions set forth below.

Chart 740A – Accused Instrumentalities for Claims 1 and 7-21

Series	Model(s)
3-Series	28S305; 32S21; 32S305; 32S321; 32S323; 32S325; 32S327; 32S330; 32S331; 32S334; 32S335; 40S305; 40S325; 40S330; 40S334; 43S305; 43S325; 43S334
4-Series	43S403; 43S405; 43S421; 43S423; 43S425; 43S431; 43S433; 43S434; 43S435; 43S446; 43S455; 50S434; 50S435; 50S446; 50S455; 55S20; 55S21; 55S431; 55S433; 55S434; 55S435; 55S446; 55S455; 65S434; 65S435; 65S446; 65S455; 70S434; 75S433; 75S434; 75S435; 75S446; 75S455; 85S435; 85S446
5-Series	43S525

Chart 740B – Accused Instrumentalities for Claims 2-3 and 22-29

Series	Model(s)
3-Series	40S305; 40S325; 40S330; 40S334; 43S305; 43S325; 43S334
4-Series	43S403; 43S405; 43S421; 43S423; 43S425; 43S431; 43S433; 43S434; 43S435; 43S446; 43S455; 50S434; 50S435; 50S446; 50S455; 55S20; 55S21; 55S431; 55S433; 55S434; 55S435; 55S446; 55S455; 65S434; 65S435; 65S446; 65S455; 70S434; 75S433; 75S434; 75S435; 75S446; 75S455; 85S435; 85S446
5-Series	43S525

Chart 740C – Accused Instrumentalities for Claim 31

Series	Model(s)
4-Series	55S20; 55S21; 55S431; 55S433; 55S434; 55S435; 55S446; 55S455; 65S434; 65S435; 65S446; 65S455; 70S434; 75S433; 75S434; 75S435; 75S446; 75S455; 85S435; 85S446

5. U.S. Patent No. 9,788,346

For U.S. Patent No. 9,788,346, each of the Accused Instrumentalities identified in the chart below infringes all of the asserted claims of the ’346 patent as identified above in section 3-1(a). The Accused Instrumentalities include all TCL televisions that comply with the 802.11ac amendment to the Wi-Fi standard, including but not limited to the TCL model numbers identified in the chart below. Each of the Accused Instrumentalities identified in the chart below infringes claims 9-10, 12-14, 16 of the ’346 patent, as explained in more detail in LGE’s Patent L.R. 3-1(c) Disclosures and attached claims charts. LGE also accuses all other TCL televisions (made, used, sold, imported, or offered for sale by or for TCL during the damages period for the ’346 patent) that are insubstantially different (or which have substantially the same structure and/or operation and achieve substantially the same function and/or result), with respect to the asserted claims of the ’346 patent, from any of the TCL model televisions set forth below.

Series	Model(s)
3-Series	32S321; 32S325; 32S327; 32S331; 32S335; 40S325; 43S325; 49S325

4-Series	43S455; 55S455; 65S455; 75S455; 43S403; 43S405; 43S421; 43S423; 43S425; 43S431; 43S433; 43S434; 43S435; 43S446; 49S403; 49S405; 49S425; 50S421; 50S423; 50S425; 50S431; 50S434; 50S435; 50S446; 55S401; 55S403; 55S405; 55S20; 55S21; 55S421; 55S423; 55S425; 55S431; 55S433; 55S434; 55S435; 55S446; 65S401; 65S403; 65S405; 65S421; 65S423; 65S425; 65S431; 65S434; 50S455; 65S435; 65S446; 70S430; 70S434; 75S421; 75S423; 75S425; 75S431; 75S433; 75S434; 75S435; 75S446; 85S435; 85S446
5-Series	55S531; 65S531; 43S513; 43S515; 43S517; 43S525; 49S513; 49S515; 49S517; 50S525; 50S535; 55S513; 55S515; 55S517; 55S525; 55S535; 65S513; 65S515; 65S517; 65S525; 65S535; 75S535
6-Series	55R613; 55R615; 55R617; 55R625; 55R635; 55R646; 65R615; 65R617; 65R625; 65R635; 65R646; 65R648; 75R615; 75R617; 75R635; 75R646; 75R648
7-Series	85R745; 98R754
8-Series	65Q825; 75Q825
9-Series	85X925

6. U.S. Patent No. 10,499,431

For U.S. Patent No. 10,499,431, each of the Accused Instrumentalities identified in the chart below infringes all of the asserted claims of the ’431 patent as identified above in section 3-1(a). The Accused Instrumentalities include TCL televisions which comply with the 802.11ac

amendment to the Wi-Fi standard, including but not limited to the model numbers identified in the chart below. Each of the Accused Instrumentalities identified in the chart below infringes claims 1-2, 4-5, 7-8, 10-11, 13-16 of the ’346 patent, as explained in more detail in LGE’s Patent L.R. 3-1(c) Disclosures and attached claims charts. LGE also accuses all other TCL televisions (made, used, sold, imported, or offered for sale by or for TCL during the damages period for the ’431 patent) that are insubstantially different (or which have substantially the same structure and/or operation and achieve substantially the same function and/or result), with respect to the asserted claims of the ’346 patent, from any of the TCL model televisions set forth below.

Series	Model(s)
3-Series	32S321; 32S325; 32S327; 32S331; 32S335; 40S325; 43S325; 49S325
4-Series	43S455; 55S455; 65S455; 75S455; 43S403; 43S405; 43S421; 43S423; 43S425; 43S431; 43S433; 43S434; 43S435; 43S446; 49S403; 49S405; 49S425; 50S421; 50S423; 50S425; 50S431; 50S434; 50S435; 50S446; 55S401; 55S403; 55S405; 55S20; 55S21; 55S421; 55S423; 55S425; 55S431; 55S433; 55S434; 55S435; 55S446; 65S401; 65S403; 65S405; 65S421; 65S423; 65S425; 65S431; 65S434; 50S455; 65S435; 65S446; 70S430; 70S434; 75S421; 75S423; 75S425; 75S431; 75S433; 75S434; 75S435; 75S446; 85S435; 85S446
5-Series	55S531; 65S531; 43S513; 43S515; 43S517; 43S525; 49S513; 49S515; 49S517; 50S525; 50S535; 55S513; 55S515; 55S517; 55S525; 55S535; 65S513; 65S515; 65S517; 65S525; 65S535; 75S535

6-Series	55R613; 55R615; 55R617; 55R625; 55R635; 55R646; 65R615; 65R617; 65R625; 65R635; 65R646; 65R648; 75R615; 75R617; 75R635; 75R646; 75R648
7-Series	85R745; 98R754
8-Series	65Q825; 75Q825
9-Series	85X925

Further Accused Instrumentalities

LGE has compiled the preceding identification of the Accused Instrumentalities (for each Asserted Patent) from the information currently available without the benefit of any discovery from any Defendants or third parties in this action. There may be additional TCL products that infringe the Asserted Claims, which are currently unknown to LGE, or additional TCL products that are made, used, imported, sold, or offered for sale in the future and that infringe the Asserted Claims, and for these reasons are not specifically identified above. LGE reserves the right to modify, amend, and/or supplement the above identification with additional Accused Instrumentalities.

C. INFRINGEMENT CHARTS (Local Patent Rule 3-1(c))

LGE attaches a set of charts identifying specifically where each element of each of the Asserted Claims is found within Defendants' Accused Instrumentalities as follows: **Exhibit A** (the '803 patent), **Exhibit B** (the '452 patent), **Exhibit C** (the '311 patent), **Exhibit D** (the '740 patent), **Exhibit E** (the '346 patent), **Exhibit F** (the '431 patent), and the Appendices to those Exhibits.

LGE reserves the right to amend or supplement these charts, or to generate additional charts, based on discovery from Defendants or any third parties, any of Defendants' disclosures, any voluntary disclosures from any third parties, facts or evidence learned during this case, any of Defendants' contentions, admissions, pleadings, briefs, or exhibits to any such filings, the issuance of a claim construction ruling by the Court, or for any other reason permitted under the Federal Rules of Civil Procedure and/or the Local Rules of this Court and/or any Order of this Court.

D. STATEMENT OF INFRINGEMENT (Local Patent Rule 3-1(d))

Defendants directly infringe the Asserted Claims by importing, making, using, offering for sale, and/or selling the Accused Instrumentalities. For example, in addition to selling Accused Instrumentalities, Defendants' direct infringement includes any testing, quality assurance, and/or refurbishment of the Accused Instrumentalities performed in the United States.

Based on its current understanding of the claim language (prior to claim construction) and publicly available information pertaining to the Accused Instrumentalities, and without notice of any non-infringement positions from Defendants in this case to date, LGE asserts that Defendants literally infringe each element, limitation, and/or step of the Asserted Claims as set forth herein (including the claims charts attached hereto) and thus the Accused Instrumentalities literally infringe the Asserted Claims.

Additionally, for any claim element, limitation, or step that is deemed to be not literally infringed by any of the Accused Instrumentalities, LGE asserts that such claim element, limitation, or step is also satisfied under the doctrine of equivalents because any difference between any such claim element, limitation, or step and the Accused Instrumentalities is insubstantial. In other words, the Accused Instrumentalities perform substantially the same function, in substantially the same way, to achieve substantially the same result, as each such element, limitation, or step of the Asserted Claims (and as set forth in the claim charts attached hereto). For example, with respect

to claim 3 of the ’740 patent, the Accused Instrumentalities comprise a spacer which performs substantially the same function (e.g., exhibiting light transmission, refraction, or reflection), in substantially the same way (e.g., a transparent or semi-transparent object which exhibits light transmission, refraction, or reflection), to achieve substantially the same result (e.g., light is transmitted, refracted, or reflected). As another example, with respect to claim 10 of the ’740 patent, the Accused Instrumentalities comprise a combination of an adhesive connecting the reflection layer to the lower cover and a black adhesive connecting the circuit substrate to the lower cover thereby fixing the reflection layer and the circuit substrate relative to each other, and performing substantially the same function (e.g., fixing the reflection layer and circuit substrate relative to each other), in substantially the same way (e.g., adhesives), to achieve substantially the same result (e.g., the reflection layer is fixed to the circuit substrate). As discovery has not yet begun and the Court has not issued a claim construction Order, LGE reserves the right to rely on the doctrine of equivalents at trial.

Defendants also indirectly infringe the Asserted Claims in violation of §271(b) by taking active steps to encourage and facilitate direct infringement by third parties, including users, partners, affiliates, subsidiaries, and service providers, in the United States with knowledge and the specific intent that its efforts would result in the direct infringement of the Asserted Claims. For example, as discussed in the Complaint and Answer, Defendants licensed patents from Plaintiff for several years, which confirms that Defendants understood that their products used technology covered by Plaintiff’s patents. In addition, Defendants have been aware of the ’803 patent since at least June 4, 2021, and Defendants received a claim chart for the ’803 patent no later than June 4, 2021. Defendants have been aware of the ’452 patent since at least January 16, 2019, and Defendants received a claim chart for the ’452 patent no later than March 9, 2020.

Defendants have been aware of the ’311 patent since at least January 20, 2020, and Defendants received a claim chart for the ’311 patent no later than March 9, 2020. Defendants have been aware of the ’740 patent since at least June 4, 2021, and Defendants received a claim chart for the ’740 patent no later than June 4, 2021. Defendants have been aware of the ’346 patent since at least January 16, 2019, and Defendants received a claim chart for the ’346 patent no later than March 9, 2020. Defendants have been aware of the’431 patent, since at least March 9, 2020. After receiving such notice and ceasing to pay for a license, Defendants continued to encourage others to import, make, use, offer for sale, and/or sell televisions infringing upon the Asserted Claims. Evidence of such ongoing activities includes Defendants’ participation in trade shows such as the Consumer Electronics Show in January 2020 and January 2022. *See e.g.*, https://www.tcl.com/eu/en/ces-2022; https://www.tcl.com/ces2020; and https://www.youtube.com/watch?v=PBTLalS_eyM. Further evidence of Defendants ongoing efforts to encourage others to infringe the Asserted Claims may include (without limitation) advertisements and promotional material for televisions that infringe the Asserted Claims, user guides and manuals for such televisions, and/or agreements with distributors for such televisions.

Defendants further infringe the Asserted Claims in violation of §271(f) by exporting parts from the United States to one or more facilities in other countries (e.g., a factory in Mexico), with the intention that such parts be combined in a manner that would infringe the Asserted Claims if done in the United States.

LGE reserves the right to amend or supplement its infringement statement and this disclosure, based on or in response to Defendants’ P.R. 3-4 production and disclosures, after claim terms are construed, after receiving Defendants’ source code and other confidential document productions, after receiving Defendants’ non-infringement contentions, after receiving

Defendants' disclosures and any voluntary disclosures from any third parties, after receiving discovery of additional information regarding Defendants' infringement from either Defendants or any third parties, after receiving any pleadings, briefs, or exhibits to any such filings, or as permitted under the Federal Rules of Civil Procedure and/or the Local Patent Rules of this Court and/or any Order of this Court.

E. PRIORITY DATE (Local Patent Rule 3-1(e))

Based on the presently available information and its investigations to date, LGE contends that conception of the subject matter of the Asserted Claims occurred as follows:

The '803 patent issued from U.S. application No. 11/401,798 that was filed on April 10, 2006, properly claims priority to Korean application No. 10-2005-0031350 that was filed on April 15, 2005. Therefore, the asserted claims of the '803 patent are entitled to a priority date of at least no later than April 15, 2005. Furthermore, the date of conception for the asserted claims of the '803 patent is at least October 14, 2004, as demonstrated in documents being produced as part of this disclosure. Thus, LGE asserts that the priority date of the asserted claims of the '803 patent is at least as early as October 14, 2004.

The '452 patent, issued from U.S. application No. 11/785,524 that was filed on April 18, 2007, properly claims priority to U.S. application No. 11/374,112 that was filed on March 14, 2006, which properly claims priority to U.S. application No. 09/922,863 that was filed on August 7, 2001, which properly claims priority to Korean application No. 2000-45807 that was filed on August 8, 2000. Therefore, the asserted claims of the '452 patent are entitled to a priority date of at least no later than August 8, 2000.

The '311 patent, issued from U.S. application No. 15/788,510 that was filed on October 19, 2017, properly claims priority to U.S. application No. 15/390,198 that was filed on December 23, 2016, which properly claims priority to U.S. application No. 13/535,735 that was filed on June

28, 2012, which properly claims priority to Korean application No. 10-2011-0088863 that was filed on September 2, 2011. Therefore, the asserted claims of the ’311 patent are entitled to a priority date of at least no later than September 2, 2011. Furthermore, the date of conception for the asserted claims of the ’311 patent is at least May 25, 2011, as demonstrated in documents being produced as part of this disclosure. Thus, LGE asserts that the priority date of the asserted claims of the ’311 patent is at least as early as May 25, 2011.

The ’740 patent, issued from application No. 14/455,569 that was filed on August 8, 2014, properly claims priority to U.S. application No. 14/161,284 that was filed on January 22, 2014, which properly claims priority to Korean application No. 10-2013-0007294 that was filed on January 23, 2013. Therefore, the asserted claims of the ’740 patent are entitled to a priority date of at least no later than January 23, 2013. Furthermore, the date of conception for the asserted claims of the ’740 patent is at least September 7, 2012, as demonstrated in documents being produced as part of this disclosure. Thus, LGE asserts that the priority date of the asserted claims of the ’740 patent is at least as early as September 7, 2012.

The ’346 patent, issued from application No. 15/357,438 that was filed on November 21, 2016, properly claims priority to U.S. application No. 14/800,425 that was filed on July 15, 2015, which properly claims priority to U.S. application No. 14/579,286 that was filed on December 22, 2014, which properly claims priority to U.S. application 12/999,836 that was filed as application No. PCT/KR2009/003264 on June 18, 2009, which properly claims priority to Korean application No. 10-2008-0057246 that was filed on June 18, 2008. Therefore, the asserted claims of the ’346 patent are entitled to a priority date of at least no later than June 18, 2008. Furthermore, the date of conception for the asserted claims of the ’346 patent is at least June 4, 2008, as demonstrated in

documents being produced as part of this disclosure. Thus, LGE asserts that the priority date of the asserted claims of the ’346 patent is at least as early as June 4, 2008.

The ’431 patent, issued from application No. 15/708,503 that was filed on September 19, 2017, properly claims priority to U.S. application No. 15/357,438 that was filed on November 21, 2016, which properly claims priority to U.S. application No. 14/800,425 that was filed on July 15, 2015, which properly claims priority to U.S. application 14/579,286 that was filed on December 22, 2014, which properly claims priority to U.S. application No. 12/999,836 that was filed as application No. PCT/KR2009/003264 that was filed on June 18, 2009, which properly claims priority to Korean application No. 10-2008-0057246 that was filed on June 18, 2008. Therefore, the asserted claims of the ’431 patent are entitled to a priority date of at least June 18, 2008. Furthermore, the date of conception for the asserted claims of the ’431 patent is at least June 4, 2008, as demonstrated in documents being produced as part of this disclosure. Thus, LGE asserts that the priority date of the asserted claims of the ’431 patent is at least as early as June 4, 2008.

For each Asserted Patent, LGE reserves the right to assert an earlier priority date in response to Defendants’ P.R. 3-4 production and disclosures, any of Defendants’ pleadings/briefs/declarations (and exhibits thereto), additional discovery or voluntary disclosures from third parties, issuance of a claim construction order, any other event leading to discovery of additional information regarding Defendants’ infringement or the date of invention, or as permitted under the Federal Rules of Civil Procedure and/or the Local Patent Rules of this Court and/or any Order of this Court.

F. LGE’S OWN APARATUS, PRODUCT, DEVICE, PROCESS, METHOD, ACT OR OTHER INSTRUMENTALITY THAT PRACTICES CLAIMED INVENTION (Local Patent Rule 3-1(f))

The subsections below provide the information required by Local Patent Rule 3-1(f). LGE further reserves the right to identify additional products practicing the Asserted Claims in response

to the release of additional products by LGE, any of Defendants' pleadings/briefs/declarations (and exhibits thereto), additional discovery or voluntary disclosures from third parties, issuance of a claim construction order, and/or as permitted under the Federal Rules of Civil Procedure and/or the Local Patent Rules of this Court and/or any Order of this Court.

1. U.S. Patent No. 7,982,803

For U.S. Patent No. 7,982,803, and subject to the foregoing objections, LGE identifies LGE televisions having WebOS version 5.0 or later as practicing claims 1, 2, 6-10, 13, 14, and 16 of the '803 patent, including the exemplary model numbers identified in the chart below.

OLED48C1	55UN6955	43UP7670
OLED55C1	65UN6955	50UP7670
OLED55CX	70UN6955	55UP7670
OLED65C1	43UN7000	65UP7670
OLED65CX	50UN7000	43UP8000
OLED77C1	55UN7000	55UP8000
32LM577B	70UN7070	43UQ7070
32LQ630B	43UN7300	50UQ7070
43UN6950	55UN7300	55UQ7070
50UN6950	43UP7000	65UQ7070
55UN6950	50UP7000	65UQ7570
65UN6950	55UP7000	43UQ7590
65UN6955	65UP7000	43UQ8000
43UN6955	70UP7070	55UQ8000
50UN6955	75UP7070	65UQ8000

2. U.S. Patent No. 7,839,452

For U.S. Patent No. 7,839,452, and subject to the foregoing objections, LGE identifies LGE televisions with 4k upscaling as practicing claims 1-3, 5-17, 19-21, and 23 of the '452 patent, including the exemplary model numbers identified in the chart below.

OLED48C1	43UN7000	55UP7670
OLED55C1	50UN7000	65UP7670

OLED65C1	55UN7000	43UP8000
OLED77C1	70UN7070	55UP8000
43UN6950	43UN7300	43UQ7070
50UN6950	55UN7300	50UQ7070
55UN6950	43UP7000	55UQ7070
65UN6950	50UP7000	65UQ7070
65UN6955	55UP7000	65UQ7570
43UN6955	65UP7000	43UQ7590
50UN6955	70UP7070	43UQ8000
55UN6955	75UP7070	55UQ8000
65UN6955	43UP7670	65UQ8000
70UN6955	50UP7670	

3. U.S. Patent No. 9,788, 346

For U.S. Patent No. 9,788,346, and subject to the foregoing objections, LGE identifies LGE televisions compatible with the 802.11ac standard as practicing claims 9-10, 12-14, and 16 of the ’346 patent, including the exemplary model numbers identified in the chart below.

OLED48C1	55UN6955	43UP7670
OLED55C1	65UN6955	50UP7670
OLED55CX	70UN6955	55UP7670
OLED65C1	43UN7000	65UP7670
OLED65CX	50UN7000	43UP8000
OLED77C1	55UN7000	55UP8000
32LM577B	70UN7070	43UQ7070
32LQ630B	43UN7300	50UQ7070
43UN6950	55UN7300	55UQ7070
50UN6950	43UP7000	65UQ7070
55UN6950	50UP7000	65UQ7570
65UN6950	55UP7000	43UQ7590
65UN6955	65UP7000	43UQ8000
43UN6955	70UP7070	55UQ8000
50UN6955	75UP7070	65UQ8000

4. U.S. Patent No. 10,499,431

For U.S. Patent No. 10,499,431, and subject to the foregoing objections, LGE identifies LGE televisions compatible with the 802.11ac standard as practicing claims 1-2, 4-5, 7-8, 10-11, and 13-16 of the '431 patent, including the exemplary model numbers identified in the chart below.

OLED48C1	55UN6955	43UP7670
OLED55C1	65UN6955	50UP7670
OLED55CX	70UN6955	55UP7670
OLED65C1	43UN7000	65UP7670
OLED65CX	50UN7000	43UP8000
OLED77C1	55UN7000	55UP8000
32LM577B	70UN7070	43UQ7070
32LQ630B	43UN7300	50UQ7070
43UN6950	55UN7300	55UQ7070
50UN6950	43UP7000	65UQ7070
55UN6950	50UP7000	65UQ7570
65UN6950	55UP7000	43UQ7590
65UN6955	65UP7000	43UQ8000
43UN6955	70UP7070	55UQ8000
50UN6955	75UP7070	65UQ8000

III. PLAINTIFF'S DOCUMENT PRODUCTION (Local Patent Rule 3-2)

After reasonable investigation and inquiry, LGE is not aware of any documents responsive to P.R. 3-2(a) and thus is not producing any such documents.

LGE is contemporaneously herewith producing documents responsive to P.R. 3-2(b) with Bates numbers LGE-TCL-000010031 to LGE-TCL000010099.

LGE is contemporaneously herewith producing documents responsive to P.R. 3-2(c) with Bates numbers LGE-TCL-000000133 to LGE-TCL-000010030.

Date: September 8, 2022

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CERTIFICATE OF SERVICE

I hereby certify that on September 8, 2022, the foregoing was served upon the below named counsel of record via electronic mail:

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