

Exhibit 1013

**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 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.

CASE NO. 2:22-CV-122-JRG

JURY TRIAL DEMANDED

DEFENDANTS' AMENDED PATENT RULE 4-2 DISCLOSURES

Pursuant to P.R. 4-2 and the Court's Second Amended Docket Control Order (Dkt. No. 67), 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.)

Ex. 1013 - TCL Indus Holdings Co., Ltd.
TCL Indus Holdings Co., Ltd v. LGE - IPR2023-00866

(collectively, “Defendants”) hereby propose the following preliminary claim constructions and amend their identification of extrinsic evidence for U.S. Patent Nos. 7,982,803 (the “’803 patent”); 7,839,452 (the “’452 patent”); 10,334,311 (the “’311 patent”); 9,080,740 (the “’740 patent”); 9,788,346 (the “’346 patent”); 10,499,431 (the “’431 patent”) (collectively, the “Asserted Patents”).

Defendants base these constructions upon their current knowledge, understanding, and belief as to the facts and information available as of this date. As Defendants have not yet completed their investigation, collection of information, or discovery relating to this action, they expressly reserve the right to supplement, amend, and/or otherwise modify their preliminary claim constructions and identification of extrinsic evidence, including offering separate constructions for claim terms that are construed as a phrase in this document or arguing that proposed terms either do not require construction or are indefinite.

Defendants have produced to Plaintiff LG Electronics Inc. (“Plaintiff” or “LGE”) extrinsic evidence supporting their preliminary claim constructions. Defendants will identify at a later date, consistent with P.R. 4-3, the intrinsic evidence supporting their claim constructions, including but not limited to the specification, the prosecution history, and the cited references on the face of, or identified in the specification or prosecution history of, each of the Asserted Patents and any related patents or patent applications.

While Defendants preliminarily identify extrinsic evidence that they contend supports their proposed claim constructions, Defendants reserve the right to present additional extrinsic evidence, including but not limited to dictionary definitions, citations to learned treatises and prior art, and testimony of percipient and expert witnesses at least at the time of filing the Joint Claim Construction and Prehearing Statement pursuant to P.R. 4-3 or in rebuttal to any extrinsic

evidence which Plaintiff may offer to support its proposed claim constructions. Defendants also expressly reserve the right to rely on extrinsic evidence upon which Plaintiff relies. By identifying this extrinsic evidence, Defendants do not concede that extrinsic evidence is necessary to construe the claim terms at issue.

In addition to the extrinsic evidence identified herein, Defendants may rely upon one or more experts, including Mark Lanning, to testify regarding the proposed constructions or to address disputes or constructions raised by Plaintiff as specified below. Such testimony could include, *inter alia*, an explanation of the meaning of claim terms in the context of the subject matter disclosed in the Asserted Patents, a description of the state of the technology relating to the alleged inventions claimed in the Asserted Patents, how a person of ordinary skill in the art would interpret the identified claim terms or phrases at the time the applications for the Asserted Patents were filed, and an explanation as to why certain terms or phrases are indefinite.

I. U.S. PATENT NO. 7,982,803

Claim(s)	Term/Phrase	Defendants' Preliminary Proposed Construction	Preliminary Identification of Extrinsic Evidence
1, 2, 8, 9, 10	a kind of an/the external device;/ detecting/determining the kind of an/the external device	identification of characteristics of an external device	
1, 8, 9, 10	controlling the switching unit/the outputting unit according to a kind of the external device/selecting an audio signal according to a result of the determination and outputting the selected audio signal to the external device	automatically controlling the switching unit/the outputting unit according to a kind of the external device/automatically selecting an audio signal according to a result of the determination and outputting the selected audio signal to the external device	"Automatically" - In an automatic manner; without thought or conscience intention. Webster's Third International Dictionary, 1985 – Merriam Webster Inc., p. 261.

1, 6, 7, 10, 16	selecting at least an audio signal for output to an external device/ selecting an audio signal that is output to an external device/selecting an audio signal . . . for output to an external audio device	selecting between two or more different audio signals to output to a common external device	“Select” to choose from a number or group. Webster’s Third International Dictionary, 1985 – Merriam Webster Inc., p. 2058.
16	selecting an output mode of video processing equipment	a user directly designates an audio output path to an external device	

II. U.S. PATENT NO. 7,839,452

Claim(s)	Term/Phrase	Defendants’ Preliminary Proposed Construction	Preliminary Identification of Extrinsic Evidence
1, 2, 5, 6, 10, 12, 14, 15, 17, 20, 21	bit map conversion/bitmap converter/convert(s) the text data into (the) bitmap data	processing data not in bitmap format into corresponding bitmap data.	
1, 3, 12, 20	format-conversion/converted in format/format converter/convert the format of the ... bit map data	scale bitmap data in the horizontal or vertical dimension or in both the horizontal and vertical dimensions.	

III. U.S. PATENT NO. 10,334,311

Claim(s)	Term/Phrase	Defendants’ Preliminary Proposed Construction	Preliminary Identification of Extrinsic Evidence
1, 2, 3, 4, 7, 11, 12, 13, 14, 15, 18, 21	icon(s)	A symbol that is a pictorial representation of a command or object and is located on a graphics tablet or an on-screen menu.	IEEE100 - The Authoritative Dictionary of IEEE Standards Terms" (2000), pub. Institute of Electrical and Electronics Engineers, Seventh Edition.
1, 7, 9, 11, 12, 18, 21	first/second default image	an image different from an external device icon	
1, 2, 3, 4, 7, 11, 12, 13,	select/selected/selectable	choose from a number or group	“Select” to choose from a number or group.

14, 15, 18, 21			Webster's Third International Dictionary, 1985 – Merriam Webster Inc., p. 2058
4, 5, 15, 16	cursor	a cross, flashing underscore, or other symbol that represents a position on a graphics display surface	IEEE 100: The Authoritative Dictionary of IEEE Standards Terms (2000), Seventh Edition, p. 261

IV. U.S. PATENT NO. 9,788,346

Claim(s)	Term/Phrase	Defendants' Preliminary Proposed Construction	Preliminary Identification of Extrinsic Evidence
9, 12, 13, 16	station (STA)	a device that contains an IEEE 802.11-conformant media access control (MAC) and physical layer (PHY) to the wireless medium (WM).	IEEE Standard for Information Technology; Telecommunications and Information exchange between systems; Local and metropolitan area networks, Specific requirements: PART 11" Wireless LAN Medium Access Control (MAC) and Physical Layer Specifications (2007), definition 3.136, p. 14. TCL may rely on the testimony of Mr. Mark Lanning, whose testimony may include that a POSITA at the time of the '346 and '431 patents would understand this term as used in the '346 and '431 patents to mean a device that contains an IEEE 802.11-

			conformant media access control (MAC) and physical layer (PHY) to the wireless medium (WM). Mr. Lanning may include a discussion of the background technology, including the relevant IEEE 802.11 standards on Wi-Fi, and the knowledge and level of skill of a POSITA. His testimony may further include analysis of the intrinsic record and extrinsic evidence as it relates to this term.
12, 16	Very High Throughput (VHT)	processing speed of 1 Gbps or more in the multi-channel environment	TCL may rely on the testimony of Mr. Mark Lanning, whose testimony may include that a POSITA at the time of the '346 patent would understand this term as used in the '346 patent to mean processing speed of 1 Gbps or more in the multi-channel environment. Mr. Lanning may include a discussion of the background technology, including the relevant IEEE 802.11 standards on Wi-Fi, and the knowledge and level of skill of a POSITA. His testimony may further include analysis of the intrinsic record as it relates to this term.

12, 16	Access Point (AP) station	an entity that has station (STA) functionality and provides access to the distribution services, via the wireless medium (WM) for associated STAs.	IEEE Standard for Information Technology; Telecommunications and Information exchange between systems; Local and metropolitan area networks, Specific requirements: PART 11” Wireless LAN Medium Access Control (MAC) and Physical Layer Specifications (2007), definition 3.3, p. 5. TCL may rely on the testimony of Mr. Mark Lanning, whose testimony may include that a POSITA at the time of the ’346 patent would understand this term as used in the ’346 patent to mean an entity that has station (STA) functionality and provides access to the distribution services, via the wireless medium (WM) for associated STAs. Mr. Lanning may include a discussion of the background technology, including the relevant IEEE 802.11 standards on Wi-Fi, and the knowledge and level of skill of a POSITA. His testimony may further include analysis of the intrinsic record and
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			extrinsic evidence as it relates to this term.
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V. U.S. PATENT NO. 10,499,431

Claim(s)	Term/Phrase	Defendants' Preliminary Proposed Construction	Preliminary Identification of Extrinsic Evidence
9, 12, 13, 16	station (STA)	a device that contains an IEEE 802.11-conformant media access control (MAC) and physical layer (PHY) to the wireless medium (WM).	IEEE Standard for Information Technology; Telecommunications and Information exchange between systems; Local and metropolitan area networks, Specific requirements: PART 11" Wireless LAN Medium Access Control (MAC) and Physical Layer Specifications (2007), definition 3.136, p. 14. TCL may rely on the testimony of Mr. Mark Lanning, whose testimony may include that a POSITA at the time of the '346 and '431 patents would understand this term as used in the '346 and '431 patents to mean a device that contains an IEEE 802.11-conformant media access control (MAC) and physical layer (PHY) to the wireless medium (WM). Mr. Lanning may include a discussion of the background technology, including

			the relevant IEEE 802.11 standards on Wi-Fi, and the knowledge and level of skill of a POSITA. His testimony may further include analysis of the intrinsic record and extrinsic evidence as it relates to this term.
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Dated: March 30, 2023

/s/ Bradford A. Cangro

Bradford A. Cangro (Admitted in TXED)

D.C. Bar No. 495996

bradford.cangro@pvuslaw.com

Jeremy D. Peterson (Admitted in TXED)

VA Bar No. 75302

jeremy.peterson@pvuslaw.com

PV LAW LLP

5335 Wisconsin Avenue, N.W., Suite 440

Washington, D.C. 20015

T: (202) 371-6861

F: (202) 888-3163

Michael C. Smith

State Bar No. 18650410

michael.smith@solidcounsel.com

SCHEEF & STONE, LLP

113 E. Austin Street

Marshall, Texas 75670

Office: (903) 938-8900

Anna Rebecca Skupin

State Bar No. 24084272

becca.skupin@solidcounsel.com

SCHEEF & STONE, LLP

200 North Travis Street

Suite 402

Sherman, Texas 75090

Office: (430) 262-5660

Attorneys for Defendants.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document has been served on counsel of record for Plaintiff via email on March 30, 2023.

/s/ *Bradford A. Cangro*
Bradford A. Cangro