Exhibit 1011

Jeremy Peterson

From: Brad Cangro
Sent: Monday, November 28, 2022 1:25 PM
To: Speegle, Mark; DL LGE-TCL; melissa@gillamsmithlaw.com
Cc: LGE v. TCL; Michael Smith; becca.skupin@solidcounsel.com
Subject: LGE v. TCL (2:22-cv-00122-JRG (E.D. Tex.)) - Stipulation re IPRs

Counsel,

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 Manufactruing 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.; TCL Technology Group Corporation (f/k/a TCL Corp.) (collectively, "Defendants") plan on shortly filing petitions ("Petitions") for *inter partes* review ("IPRs") on the asserted patents (U.S. Patent Nos. 7,982,803; 7,839,452; 10,334,311; 9,080,740; 9,788,346; and 10,499,431).

Defendants stipulate that if the IPRs are instituted on the grounds presented, then Defendants will not pursue invalidity positions that are brought or could have been brought in those Petitions in the parallel EDTX district court litigation.

Sincerely,

Bradford A. Cangro | Partner

PV Law LLP
5335 Wisconsin Avenue, N.W., Suite 440
Washington, D.C. 20015-2052
Direct: +1.202.869.4667
bradford.cangro@pvuslaw.com | www.pvuslaw.com