

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

**Before the Honorable MaryJoan McNamara
Administrative Law Judge**

In the Matter of

**COMPONENTS FOR CERTAIN
ENVIRONMENTALLY-PROTECTED
LCD DIGITAL DISPLAYS AND
PRODUCTS CONTAINING SAME**

Inv. No. 337-TA-1349

**JOINT CHART SETTING FORTH PARTIES' POST-HEARING CLAIM
CONSTRUCTIONS**

Pursuant to Your Honor's instructions at the *Markman* Hearing in the above-captioned Investigation, Ground Rule 1.14, and the Procedural Schedule (Order No. 5), Complainants Samsung Electronics Co., Ltd., Samsung Electronics America, Inc., Samsung Research America, Inc., and Samsung International, Inc. (collectively, "Samsung" or "Complainants") and Respondent Manufacturing Resources International, Inc. ("MRI" or "Respondent") (all together, the "Parties") hereby submit this Joint Chart Setting Forth Parties' Post-Hearing Claim Constructions.

The Parties are continuing to discuss their claim constructions with the goal of minimizing disputes. To the extent the Parties are able to reach agreement regarding any terms, the Parties will submit an updated joint chart with their supplemental post-*Markman* hearing claim construction briefs on June 21, 2023.

I. DISPUTED TERMS

No.	Term	Patent(s), Claim(s)	Proposed By	Complainants' Construction	Respondent's Construction
1	spaced from the liquid crystal panel at predetermined intervals to transmit predetermined polarized light and to block other polarized light of incident light	'575 Patent, claims 1	Samsung	spaced at a predetermined distance(s) from the liquid crystal panel such that the polarizing filter transmits predetermined polarized light and blocks other polarized light such that the thermal energy of the blocked light does not damage the liquid crystal panel if installed outdoors	<i>Plain and Ordinary Meaning:</i> separated a distance from the liquid crystal panel by air at predetermined intervals to transmit predetermined polarized light and to block other polarized light of incident light
	spaced from the liquid crystal panel at one or more predetermined intervals, and to transmit polarized light and to block other polarized light of incident light	'575 patent, claim 13	Samsung	spaced at a predetermined distance(s) from the liquid crystal panel such that the polarizing filter transmits predetermined polarized light and blocks other polarized light such that the thermal energy of the blocked light does not damage the liquid crystal panel if installed outdoors	<i>Plain and Ordinary Meaning:</i> separated a distance from the liquid crystal panel by air at one or more predetermined intervals, and to transmit polarized light and to block other polarized light of incident light
	spaced from the liquid crystal panel to transmit predetermined polarized light and to block other polarized light of incident light	'348 patent, claim 1	Samsung	spaced at a predetermined distance(s) from the liquid crystal panel such that the polarizing filter transmits predetermined polarized light and blocks other polarized light such that the thermal energy of the blocked light does not	<i>Plain and Ordinary Meaning:</i> separated a distance from the liquid crystal panel by air to transmit predetermined polarized light and to block other polarized light of incident light

No.	Term	Patent(s), Claim(s)	Proposed By	Complainants' Construction	Respondent's Construction
	spaced from a front of the liquid crystal display unit to transmit predetermined polarized light and to block other polarized light of incident light	'348 patent, claim 6	Samsung	damage the liquid crystal panel if installed outdoors spaced at a predetermined distance(s) from the liquid crystal panel such that the polarizing filter transmits predetermined polarized light and blocks other polarized light such that the thermal energy of the blocked light does not damage the liquid crystal panel if installed outdoors	<i>Plain and Ordinary Meaning:</i> separated a distance from a front of liquid crystal display unit by air to transmit predetermined polarized light and to block other polarized light of incident light
2	spaced from the liquid crystal panel at one or more predetermined intervals, and to at least one of reflect and absorb blocked light and to prevent the blocked light from being directly applied to the liquid crystal display	'575 Patent, claim 12	Samsung	spaced at a predetermined distance(s) from the liquid crystal panel such that the polarizing filter blocks light by reflection and/or absorption such that the thermal energy of the blocked light does not damage the liquid crystal panel if installed outdoors	Indefinite under 35 U.S.C. § 112 Alternatively: <i>Plain and Ordinary Meaning:</i> separated a distance from the liquid crystal panel by air and to block light by either reflection and/or absorption to prevent the blocked light from being directly applied to the liquid crystal panel

No.	Term	Patent(s), Claim(s)	Proposed By	Complainants' Construction	Respondent's Construction
3	display panel	'117 Patent, claim 1	MRI	No construction necessary. Alternatively, plain and ordinary meaning, which is: flat-type electronic display for displaying images	a flat type screen on which images are displayed, such as a Liquid Crystal Display or Plasma Display Panel
4	circuit board mounting part	'117 Patent, claims 1, 2, 5	MRI	No construction necessary. Alternatively, plain and ordinary meaning, which is: part for attaching a circuit board As discussed during the <i>Markman</i> hearing, Samsung disputes that 35 U.S.C. § 112, ¶6 applies, but if it does: <i>Function</i> : to provide an area for mounting the circuit board <i>Structure</i> : the structure recited in Column 3, lines 3-12 and lines 60-65, and/or the structures illustrated in Figures 1-2, and equivalents thereof	Subject to 35 U.S.C. § 112, ¶6 <i>Function</i> : to receive and mount the circuit board <i>Structure</i> : the specific structure recited in Column 3, lines 3-12 and 60-65 and illustrated in Figures 1-2

No.	Term	Patent(s), Claim(s)	Proposed By	Complainants' Construction	Respondent's Construction
5	display assembly	'253 Patent, claims 1, 11	MRI	No construction necessary. Alternatively, plain and ordinary meaning, which is: electronic display for displaying images	module that includes a display panel
6	state of the display assembly	'253 Patent, claim 1	MRI	No construction necessary. Alternatively, plain and ordinary meaning, which is: condition of the display assembly	Indefinite under 35 U.S.C. § 112
7	display panel assembly	'253 Patent, claim 10	MRI	display panel	Indefinite under 35 U.S.C. § 112
8	flow control device to generate an air flow to the front channel and to control a velocity of the air flow according to a state of the display assembly	'253 Patent, claim 1	MRI	No construction necessary. Alternatively, plain and ordinary meaning, which is: device, such as a fan, to generate an air flow to the front channel and to control a velocity of the air flow according to a [state of the display assembly]	Subject to 35 U.S.C. § 112, ¶6 <i>Function:</i> to generate an air flow to the front channel and to control a velocity of the air flow according to a state of the display assembly <i>Structure:</i> (None)

No.	Term	Patent(s), Claim(s)	Proposed By	Complainants' Construction	Respondent's Construction
					Indefinite under 35 U.S.C. § 112
9	flow control device [to impart turbulence to an air flow in the channel]	'311 Patent, claims 1, 3	MRI	No construction necessary. Alternatively, plain and ordinary meaning, which is: device, such as a fan, [to impart turbulence to an air flow in the channel]	Subject to 35 U.S.C. § 112, ¶6 <i>Function</i> : cause turbulent air to flow through the channel <i>Structure</i> : (None) Indefinite under 35 U.S.C. § 112
11	flow control device to control the flow rate of air in the channel to remove heat from a front side of the liquid crystal panel	'311 Patent, claim 13	MRI	No construction necessary. Alternatively, plain and ordinary meaning, which is: device, such as a fan, to control the flow rate of air in the channel to remove heat from a front side of the liquid crystal panel	Subject to 35 U.S.C. § 112, ¶6 <i>Function</i> : to control the flow rate of air in the channel to remove heat from a front side of the liquid crystal panel <i>Structure</i> : (None) Indefinite under 35 U.S.C. § 112
12	control device [to control the fan to maintain a temperature of the housing]	'253 Patent, claims 11, 16, 17, 19	MRI	No construction necessary. Alternatively, plain and ordinary meaning, which is:	Subject to 35 U.S.C. § 112, ¶6 <i>Function</i> : to control the fan to maintain a temperature of the housing

No.	Term	Patent(s), Claim(s)	Proposed By	Complainants' Construction	Respondent's Construction
				device, such as a circuit or chip, [to control the fan to maintain a temperature of the housing]	<i>Structure:</i> (None) Indefinite under 35 U.S.C. § 112
13	flow rate controller [to control air flow through the channel according to the measured temperature]	'311 Patent, claims 1, 3, 4	MRI	No construction necessary. Alternatively, plain and ordinary meaning, which is: device, such as a circuit or chip for controlling a fan, [to control air flow through the channel according to the measured temperature]	Subject to 35 U.S.C. § 112, ¶6 <i>Function:</i> to control air flow through the channel according to the measured temperature <i>Structure:</i> (None) Indefinite under 35 U.S.C. § 112
	flow rate controller control the fan according to the measured temperature to regulate the flow rate of the air in the channel	'311 Patent, claim 13	MRI	No construction necessary. Alternatively, plain and ordinary meaning, which is: device, such as a circuit or chip, to control the fan according to the measured temperature to regulate the flow rate of the air in the channel	Subject to 35 U.S.C. § 112, ¶6 <i>Function:</i> to control the fan according to the measured temperature to regulate the flow rate of the air in the channel <i>Structure:</i> (None) Indefinite under 35 U.S.C. § 112

II. AGREED-UPON TERMS

No.	Term	Patent(s), Claim(s)	Agreed-Upon Construction
1	the liquid crystal display	'575 Patent, claim 12	the liquid crystal panel
2	the detected temperature	'311 patent, claim 3	the measured temperature

Dated: June 14, 2023

Respectfully Submitted,

/s/ Patrick J. McCarthy

Patrick J. McCarthy

Annaka Nava

Craig Lytle

Sravan Tumuluri

GOODWIN PROCTER LLP

1900 N Street, N.W.

Washington, DC 20036

Tel: (202) 346-4266

PMcCarthy@goodwinlaw.com

ANava@goodwinlaw.com

CLytle@goodwinlaw.com

STumuluri@goodwinlaw.com

Darryl M. Woo

Jesse Cheng

GOODWIN PROCTER LLP

Three Embarcadero Center

San Francisco, CA 94111

Tel: (415) 733-6000

DWoo@goodwinlaw.com

JesseCheng@goodwinlaw.com

Douglas Kline

Srikanth Reddy

Harrison Gunn

GOODWIN PROCTER LLP

100 Northern Avenue

Boston, MA 02210

Tel: (617) 570-1000

DKline@goodwinlaw.com

SReddy@goodwinlaw.com

HGunn@goodwinlaw.com

Naomi Birbach

Gabriella Montes

GOODWIN PROCTER LLP

620 Eighth Avenue

New York, New York 10018

Tel: (212) 813-8800

NBirbach@goodwinlaw.com

GMontes@goodwinlaw.com

JiaKim@goodwinlaw.com

*Counsel for Complainants Samsung
Electronics Co., Ltd., Samsung Electronics
America, Inc., Samsung Research America,
Inc., and Samsung International, Inc.*

Dated: June 14, 2023

Respectfully submitted,

/s/ Joshua H. Lee

Aarti Shah

KILPATRICK TOWNSEND & STOCKTON LLP

607 14th Street, NW, Suite 900

Washington, DC 20005

Telephone: (202) 508-5800

mri-samsung1349@kilpatricktownsend.com

Dario A. Machleidt

Kathleen R. Geyer

KILPATRICK TOWNSEND & STOCKTON LLP

1420 Fifth Ave., Suite 3700

Seattle, WA 98101

Telephone: (206) 467-9600

mri-samsung1349@kilpatricktownsend.com

Russell A. Korn

David A. Reed

Joshua H. Lee

Richard W. Goldstucker

Courtney S. Dabbieri

KILPATRICK TOWNSEND & STOCKTON LLP

1100 Peachtree Street NE, Suite 2800

Atlanta, GA 30309

Telephone: (404) 815-6500

mri-samsung1349@kilpatricktownsend.com

Craig D. Cannon

Alton L. Absher, III

Andrea A. Anderson

Jonathan E. Harris

KILPATRICK TOWNSEND & STOCKTON LLP

1001 West Fourth Street

Winston-Salem, NC 27101

Telephone: (336) 607-7300

mri-samsung1349@kilpatricktownsend.com

Matthew J. Meyer

KILPATRICK TOWNSEND & STOCKTON LLP

1080 Marsh Road

Menlo Park, CA 94025

Telephone: (650) 326-2400

mri-samsung1349@kilpatricktownsend.com

Kasey E. Koballa
Kilpatrick Townsend & Stockton LLP
4208 Six Forks Road, Suite 1400
Raleigh, NC 27609
Telephone: (919) 420-1700
mri-samsung1349@kilpatricktownsend.com

Sarah Y. Kamran
KILPATRICK TOWNSEND & STOCKTON LLLP
1801 Century Park East, Suite 2300
Los Angeles, CA 90067
Telephone: (310) 310-7015
mri-samsung1349@kilpatricktownsend.com

*Counsel for Respondent Manufacturing Resources
International, Inc.*

CERTIFICATE OF SERVICE

I, Bruce Davis, hereby certify that on this 14th day of June, 2023, copies of the foregoing were served upon the following parties as indicated:

The Honorable Katherine M. Hiner Acting Secretary to the Commission U.S. International Trade Commission 500 E Street, S.W., Room 112 Washington, DC 20001-5327	VIA EDIS
The Honorable MaryJoan McNamara Administrative Law Judge U.S. International Trade Commission 500 E Street SW, Room 317 Washington, DC 20436 McNamara337@usitc.gov Alton.hare@usitc.gov	VIA EMAIL
<i>Counsel for Respondent Manufacturing Resources International, Inc.</i> Aarti Shah Kilpatrick Townsend & Stockton LLP 607 14th Street, NW, Suite 900 Washington, DC 20005 Alton L. Absher III Andrea A. Anderson Craig D. Cannon Jonathan E. Harris Kilpatrick Townsend & Stockton LLP 1001 West Fourth Street Winston-Salem, NC 27101 Courtney S. Dabbiere Russell A. Korn Joshua H. Lee David A. Reed Kilpatrick Townsend & Stockton LLP 1100 Peachtree Street NE, Suite 2800 Atlanta, GA 30309	VIA EMAIL

Kathleen R. Geyer
Dario A. Machleidt
Kilpatrick Townsend & Stockton LLP
1420 Fifth Ave., Suite 3700
Seattle, WA 98101

Kasey E. Koballa
Kilpatrick Townsend & Stockton LLP
4208 Six Forks Road, Suite 1400
Raleigh, NC 27609

Matthew J. Meyer
1302 El Camino Real, Suite 175
Menlo Park CA 94025

mri-samsung1349@kilpatricktownsend.com

/s/ Bruce Davis
Bruce Davis
Paralegal