

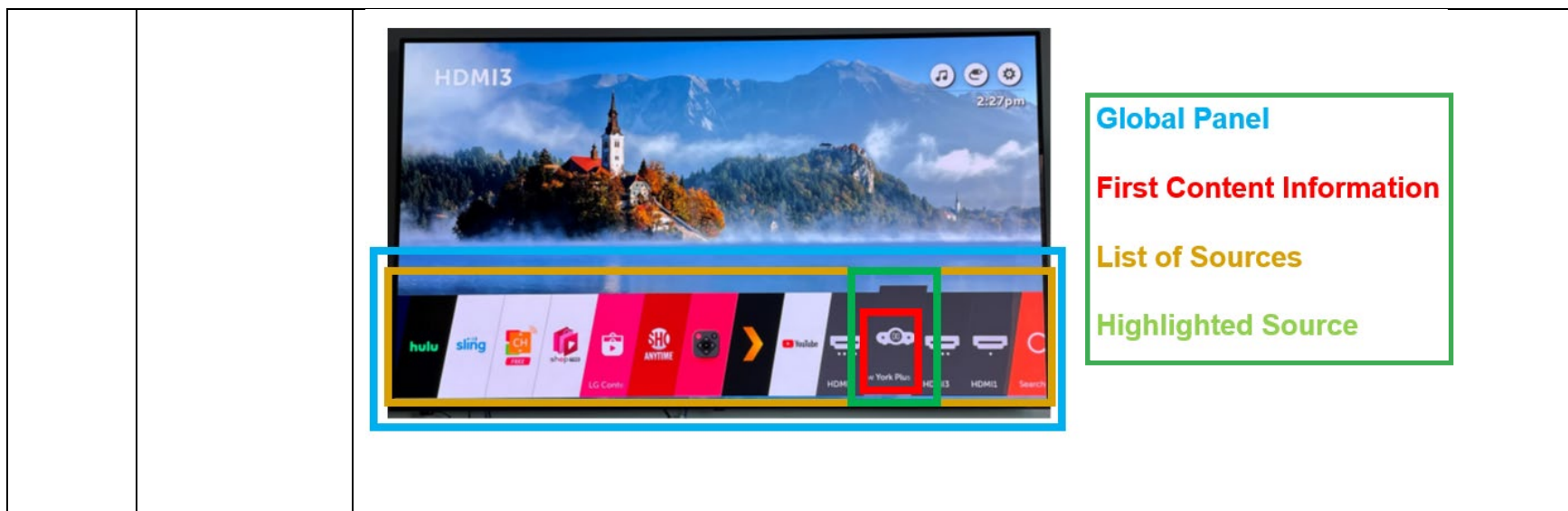
Appendix E: Claim Chart for U.S. Patent No. 9,510,040¹

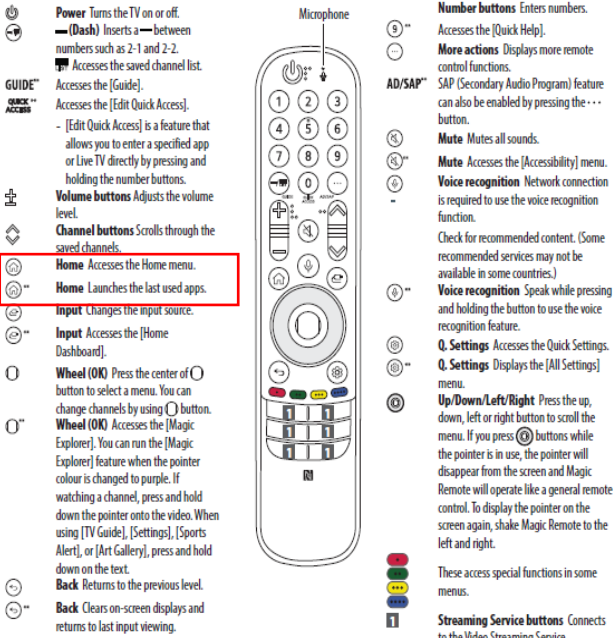
Claim Number	Claim Language	
1[a]	A method of displaying content on a television, comprising:	To the extent that the claim’s preamble is determined to be a limitation or otherwise limiting, LG and the Accused Instrumentalities perform the following steps. The Accused Instrumentalities are capable of displaying a launcher menu which comprises a method of displaying content on a television.

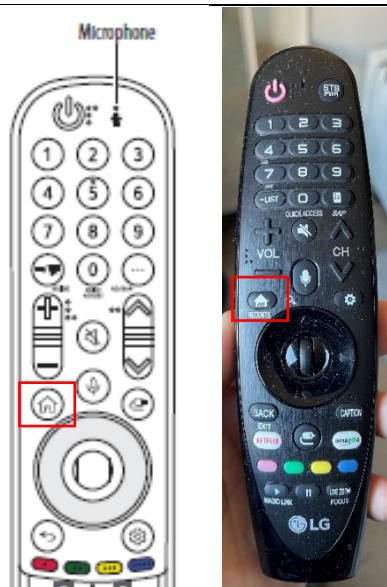
¹ Pursuant to E.D. Tex. Patent Rule 3-1(c), this claim chart identifies where each element of the asserted claims of this patent is found within all models of LG’s currently offered lines of products—OLED TVs, QNED MiniLED TVs, NanoCell TVs, and 4K Ultra HD TVs—as well as any previous versions or models of the currently offered lines of products and any other model of LG TV on which any version of LG webOS was installed (collectively, the “Accused Instrumentalities”). On information and belief, the operation of these devices with respect to these infringement contentions is substantially the same or identical, at least because each runs the LG webOS operating system—previously or alternatively known as webOS, Open webOS, HP webOS, and Palm webOS—which governs the functionality of these devices that is relevant to these infringement contentions. Thus, although this claim chart includes exemplary citations and images for devices running webOS 5.0, the explanations of how the Accused Instrumentalities meet each limitation of the claims charted herein are substantially the same or identical for each LG TV on which any version of LG webOS was installed, except as otherwise noted (*e.g.*, where a citation expressly notes it addresses a TV running webOS 2022). Plaintiff Multimedia notes that LG recently announced its 2023 TVs will include a new version of webOS (“webOS 2023”); based on publicly available information, Multimedia expects discovery to confirm that televisions on which LG’s updated webOS is installed will also infringe the asserted patent, at least due to its similarity to previous versions of webOS. *See* <https://www.lgnewsroom.com/2023/01/lgs-2023-oled-tvs-take-viewing-immersion-and-user-experience-to-new-heights/>. In providing these contentions, Multimedia notes that the identification below of where each element of the asserted claims of this patent is found is exemplary; each element of the asserted claims of this patent can be found throughout the Accused Instrumentalities, and Multimedia expressly reserves the right to rely on such other applications, features of, and methods of using the Accused Instrumentalities, and on other facts adduced through discovery, in proving its case at trial. Additionally, some of the claim elements herein may be software limitations. Accordingly, Multimedia reserves the right to amend and/or supplement this claim chart after a complete production of the source code for the Accused Instrumentalities and after production of exemplary televisions with webOS 2023 installed.



The following is an exemplary image of an LG TV display annotated with the key elements of the claim:



1[b]	receiving, by a processor, an indication associated with a selection by a user;	The Accused Instrumentalities are capable of receiving, by a processor, an indication associated with a selection by a user. For example, the processor receives an indication associated with a “home” input from a user via remote control. 4 Using Remote Control Using Magic Remote Control (Depending upon model) The descriptions in this manual are based on the buttons on the remote control. Please read this manual carefully and use the TV correctly. This remote uses infrared light. When in use, it should be pointed in the direction of the TV's remote sensor.  Power Turns the TV on or off. —(Dash) Inserts a — between numbers such as 2-1 and 2-2. GUIDE Accesses the [Guide]. QUICK ACCESS Accesses the [Edit Quick Access]. [Edit Quick Access] is a feature that allows you to enter a specified app or Live TV directly by pressing and holding the number buttons. Volume buttons Adjusts the volume level. Channel buttons Scrolls through the saved channels. Home Accesses the Home menu. Home Launches the last used apps. Input Changes the input source. Input Accesses the [Home Dashboard]. Wheel (OK) Press the center of OK button to select a menu. You can change channels by using OK button. Wheel (OK) Accesses the [Magic Explorer]. You can run the [Magic Explorer] feature when the pointer colour is changed to purple. If watching a channel, press and hold down the pointer onto the video. When using [TV Guide], [Settings], [Sports Alert], or [Art Gallery], press and hold down on the text. Back Returns to the previous level. Back Clears on-screen displays and returns to last input viewing. Microphone Number buttons Enters numbers. 9 Accesses the [Quick Help]. More actions Displays more remote control functions. AD/SAP SAP (Secondary Audio Program) feature can also be enabled by pressing the ... button. Mute Mutes all sounds. Mute Accesses the [Accessibility] menu. Voice recognition Network connection is required to use the voice recognition function. Check for recommended content. (Some recommended services may not be available in some countries.) Voice recognition Speak while pressing and holding the button to use the voice recognition feature. Q. Settings Accesses the Quick Settings. Q. Settings Displays the [All Settings] menu. Up/Down/Left/Right Press the up, down, left or right button to scroll the menu. If you press OK buttons while the pointer is in use, the pointer will disappear from the screen and Magic Remote will operate like a general remote control. To display the pointer on the screen again, shake Magic Remote to the left and right. These access special functions in some menus. Streaming Service buttons Connects to the Video Streaming Service. (Some buttons and services may not be provided depending upon models or regions.)
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See, e.g., LG Owner's Manual, at 14 (left); user photo (right).

1[c]	determining, by the processor, based on the received indication, a global panel to display via the television;	The Accused Instrumentalities are capable of determining, by the processor, based on the received indication, a global panel to display via the television. The operating system determines, by the processor, based on the received indication, a global panel to display via the television. The global panel can be displayed on the entire screen or a part of the screen of the LG Smart TV: 
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1[d]	retrieving, by the processor, from memory, a first content information for display in the global panel; and	The Accused Instrumentalities are capable of retrieving, by the processor, from memory, a first content information for display in the global panel. The operating system retrieves, by the processor, from memory, a first content information for display in the global panel. The global panel (launcher menu) displays at least a first content information (<i>e.g.</i> information about the content available in a certain source). For example, the LG TV displays the type of content available via HDMI port 2, scrolling “FIOS New York Plus” when selected:  Other sources similarly display information or graphics about their content when selected and enlarged.
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1[e]	displaying, via the television, the retrieved content information in the global panel, wherein the global panel includes a list of sources of content for the intelligent television, wherein at least one of the sources is highlighted as being associated with the first content information, and	The Accused Instrumentalities are capable of displaying, via the television, the retrieved content information in the global panel, wherein the global panel includes a list of sources of content for the intelligent television, wherein at least one of the sources is highlighted as being associated with the first content information. For example, as shown below, the icon indicating that source associated with the first content information becomes enlarged and highlighted, and also alternates text between the source name (HDMI2) and the first content information (“FIOS New York Plus”), showing that it is currently selected from among the applications available in the global panel:  Similarly for other sources, when they are selected they display source-specific information or graphics in the emphasized box.
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1[f]	wherein the sources include a live television source, a video on demand source, a media center source, an applications source, and an electrical input associated with the television.	The Accused Instrumentalities are capable of wherein the sources include a live television source, a video on demand source, a media center source, an applications source, and an electrical input associated with the television. For example, the operating system launcher menu contains sources that include at least a live television source, a video on demand source, a media center source, an applications source, and an electrical input associated with the television. 1. Live TV source—the panel contains a live television source: 
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2. **Video on demand source** – the launcher allows access to VOD apps (e.g., Netflix)



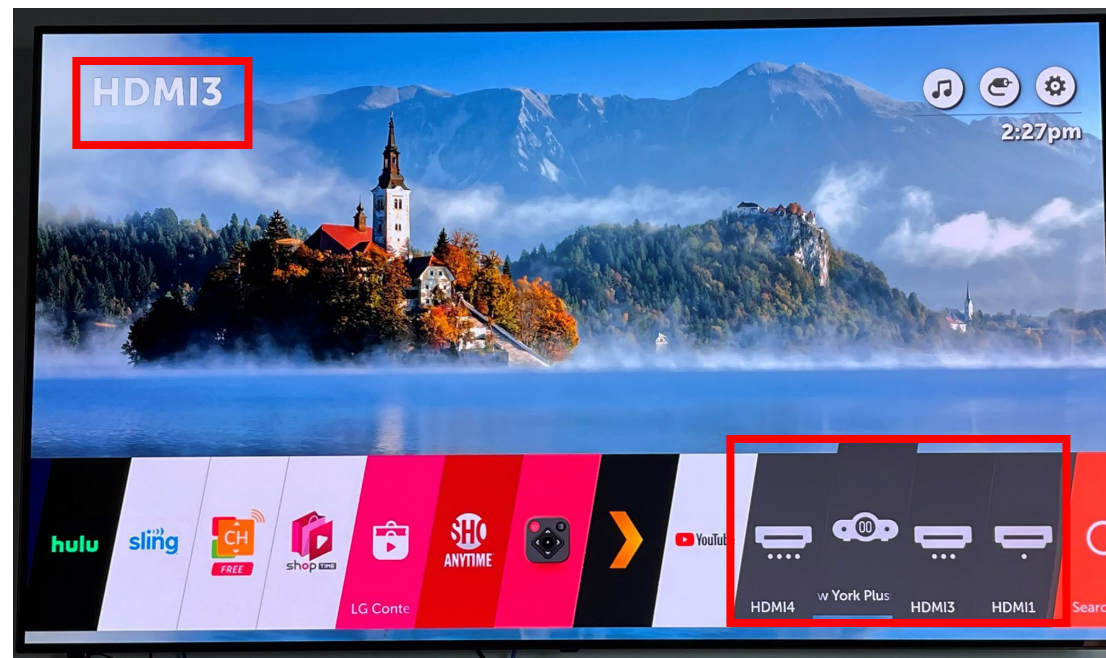
3. **Media center source** – the launcher contains sources of media such as “Music”:



4. **Applications source** – the launcher contains a number of applications (e.g. Netflix), and also contains a mechanism by which users can download additional applications onto the television, the “LG Content Store”:

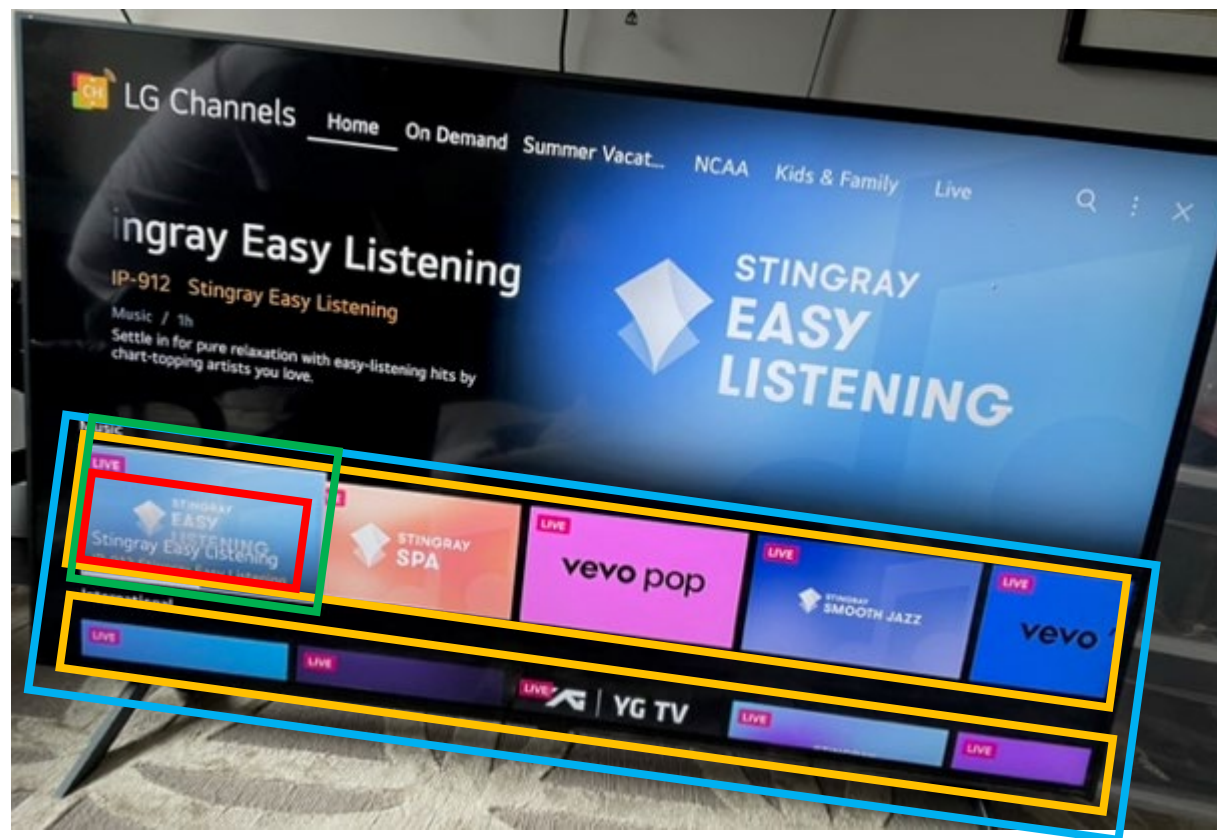


5. **An electrical input associated with the television source** – the launcher contains indications of the current electrical input source and a mechanism for changing the source:



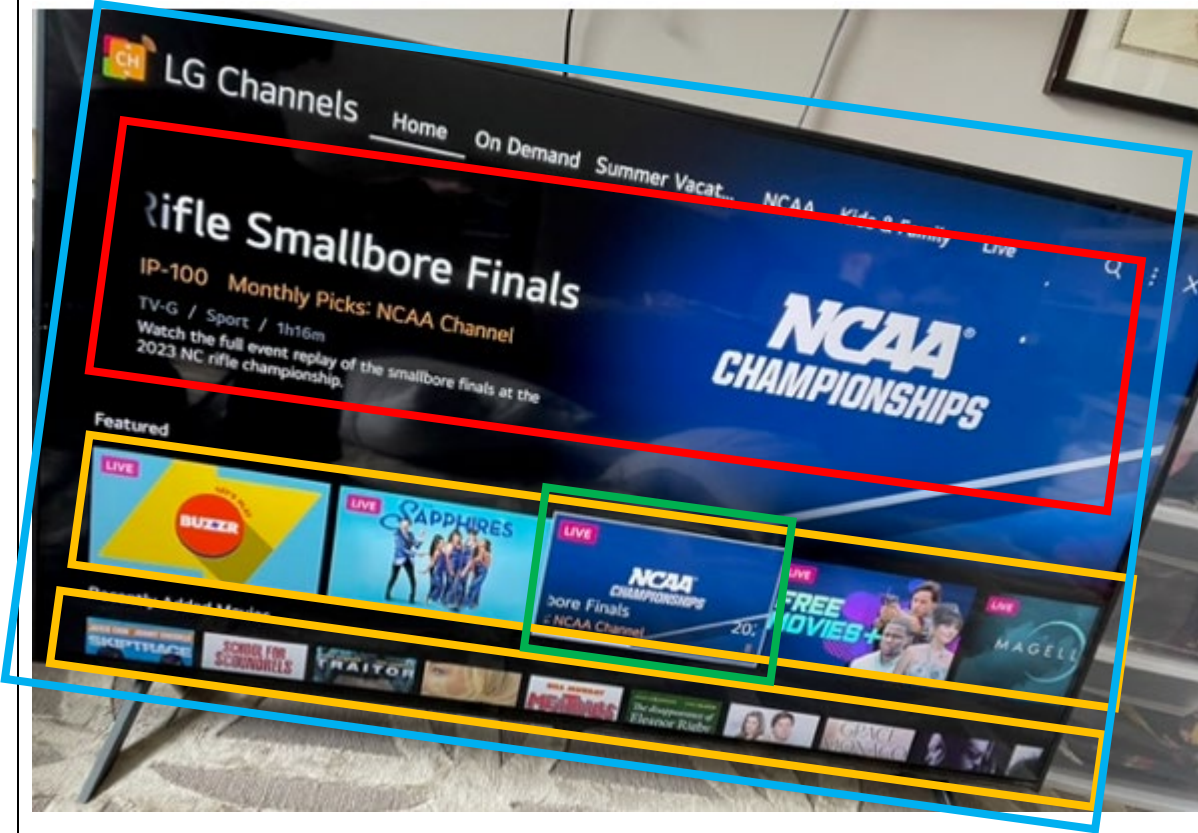
As noted in footnote 1, *supra*, Multimedia contends, and expects that discovery will show, that other versions of webOS infringe Claim 1 (and all subsequent charted claims below) for substantially the

same or identical reasons, at least because, as Multimedia expects discovery to show, the relevant functionality of each version of webOS is substantially the same or identical.² For example, Accused Instrumentalities running webOS 2022 also have a global panel accessible from the Home button that functions in accordance with the claims:



Or, alternatively:

² Again, the identification herein of where each element of the asserted claims of this patent is found is exemplary; each element of the asserted claims of this patent can be found throughout the Accused Instrumentalities, and Multimedia expressly reserves the right to rely on such other applications, features of, and methods of using the Accused Instrumentalities, and on other facts adduced through discovery, in proving its case at trial.

		
2[a]	The method of claim 1, further comprising:	The Accused Instrumentalities are capable of the method of claim 1. <i>See Claim 1.</i>

2[b]	identifying a user associated with the received indication;	The Accused Instrumentalities are capable of identifying a user associated with the received indication. For example, and as will be shown after further discovery, the Accused Instrumentalities permit users to log into a MyLG Account, which results in an individual profile—including personalized content and settings—being displayed on the Accused Instrumentalities. <i>See, e.g.</i>, https://www.youtube.com/watch?v=eedsVvKgg-Q. Additionally, LG offers personalized VOD content recommendations available to users on the home screen. https://www.lgnewsroom.com/2022/08/more-personalized-more-convenient-lg-smart-tvs-enhance-the-prime-video-viewing-experience/
2[c]	retrieving one or more settings associated with the identified user;	The Accused Instrumentalities are capable of retrieving one or more settings associated with the identified user. For example, and as will be shown after further discovery, the Accused Instrumentalities permit users to log into a MyLG Account, which results in an individual profile—including personalized content and settings—being displayed on home panel of the Accused Instrumentalities, indicating that the Accused Instrumentalities retrieve one or more settings associated with the identified user. <i>See, e.g.</i>, https://www.youtube.com/watch?v=eedsVvKgg-Q. Additionally, LG offers personalized VOD content recommendations available to users on the home screen. https://www.lgnewsroom.com/2022/08/more-personalized-more-convenient-lg-smart-tvs-enhance-the-prime-video-viewing-experience/
2[d]	retrieving, from memory, content information associated with the identified user; and	The Accused Instrumentalities are capable of retrieving, from memory, content information associated with the identified user. For example, and as will be shown after further discovery, the Accused Instrumentalities permit users to log into a MyLG Account, which results in an individual profile—including personalized content and settings—being displayed on home panel of the Accused Instrumentalities, indicating that the Accused Instrumentalities retrieve one or more settings associated with the identified user. <i>See, e.g.</i>, https://www.youtube.com/watch?v=eedsVvKgg-Q.

		Additionally, LG offers personalized VOD content recommendations available to users on the home screen. https://www.lgnewsroom.com/2022/08/more-personalized-more-convenient-lg-smart-tvs-enhance-the-prime-video-viewing-experience/
2[e]	displaying, via the television, the retrieved content information in the global panel.	The Accused Instrumentalities are capable of displaying, via the television, the retrieved content information in the global panel. For example, and as will be shown after further discovery, the Accused Instrumentalities permit users to log into a MyLG Account, which results in an individual profile—including personalized content and settings—being displayed on home panel of the Accused Instrumentalities. <i>See, e.g.</i>, https://www.youtube.com/watch?v=eedsVvKgg-Q. Additionally, LG offers personalized VOD content recommendations available to users on the home screen. https://www.lgnewsroom.com/2022/08/more-personalized-more-convenient-lg-smart-tvs-enhance-the-prime-video-viewing-experience/
3[a]	The method of claim 1, further comprising:	The Accused Instrumentalities are capable of the method of claim 1.
3[b]	identifying a user associated with the received indication;	The Accused Instrumentalities are capable of identifying a user associated with the received indication. <i>See</i> Claim 2[b].
3[c]	retrieving, from memory, one or more settings associated with the identified user;	The Accused Instrumentalities are capable of retrieving, from memory, one or more settings associated with the identified user. <i>See</i> Claim 2[c].

3[d]	retrieving, from memory, content information associated with the identified user and the one or more settings associated with the user; and	The Accused Instrumentalities are capable of retrieving, from memory, content information associated with the identified user and the one or more settings associated with the user. <i>See Claim 2[d].</i>
3[e]	displaying, via the television, the retrieved content information in the global panel.	The Accused Instrumentalities are capable of displaying, via the television, the retrieved content information in the global panel. <i>See Claim 2[e].</i>
4[a]	The method of claim 1, further comprising:	The Accused Instrumentalities are capable of the method of claim 1.
4[b]	receiving a second indication associated with a selection by a user;	The Accused Instrumentalities are capable of receiving a second indication associated with a selection by a user. For example, a user may select a second application within the global panel, such as a different input source (<i>e.g.</i>, HDMI3). <i>See also</i> Claim 1[c].
4[c]	determining, based on the second indication, a source of content	The Accused Instrumentalities are capable of determining, based on the second indication, a source of content information to be displayed in the global panel based. For example, the operating system determines, by the processor, based on the received indication, a source of content information (<i>e.g.</i>, the input plugged into HDMI3). <i>See also</i> Claim 1[d]-1[e].

	information to be displayed in the global panel based;	
4[d]	retrieving at least a portion of content information from the determined source; and	The Accused Instrumentalities are capable of retrieving at least a portion of content information from the determined source. For example, as indicated by the functionality of the Accused Instrumentalities, information from the determined source (<i>e.g.</i>, the input plugged into HDMI3) is retrieved and subsequently displayed.
4[e]	displaying, via the television, the content information associated with the determined source.	The Accused Instrumentalities are capable of displaying, via the television, the content information associated with the determined source. For example, the Accused Instrumentalities display the information associated with HDMI3. <i>See also</i>, Claim 1[d]-1[e].
11[a]	A non-transitory computer readable information storage medium having stored thereon instructions that cause a computing system to execute a method of displaying	To the extent that the claim's preamble is determined to be a limitation or otherwise limiting, the Accused Instrumentalities comprise a non-transitory computer readable information storage medium having stored thereon instructions that cause a computing system to execute a method of displaying content on a television, comprising:

	content on a television, comprising:	
11[b]	receiving an indication associated with a selection by a user;	The Accused Instrumentalities comprise a non-transitory computer readable information storage medium having stored thereon instructions that cause a computing system to execute a method of displaying content on a television, comprising: receiving an indication associated with a selection by a user. <i>See Claim 1[b].</i>
11[c]	determining, based on the received indication, a global panel to display via the television;	The Accused Instrumentalities comprise a non-transitory computer readable information storage medium having stored thereon instructions that cause a computing system to execute a method of displaying content on a television, comprising: determining, based on the received indication, a global panel to display via the television. <i>See Claim 1[c].</i>
11[d]	retrieving from memory, a first content information for display in the global panel; and	The Accused Instrumentalities comprise a non-transitory computer readable information storage medium having stored thereon instructions that cause a computing system to execute a method of displaying content on a television, comprising: retrieving from memory, a first content information for display in the global panel. <i>See Claim 1[d].</i>
11[e]	displaying, via the television, the retrieved content information in the global panel, wherein	The Accused Instrumentalities comprise a non-transitory computer readable information storage medium having stored thereon instructions that cause a computing system to execute a method of displaying content on a television, comprising: displaying, via the television, the retrieved content information in the global panel, wherein the global panel includes a list of sources of content for the intelligent television, wherein at least one of the sources is highlighted as being associated with the first content information, and wherein the sources include a live television source, a video on demand

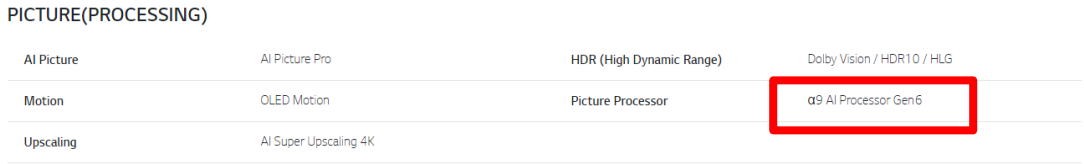
	the global panel includes a list of sources of content for the intelligent television, wherein at least one of the sources is highlighted as being associated with the first content information, and wherein the sources include a live television source, a video on demand source, a media center source, an applications source, and an electrical input associated with the television.	source, a media center source, an applications source, and an electrical input associated with the television. <i>See Claim 1[e].</i>
12[a]	The non-transitory computer-readable medium of claim 11, wherein the	The Accused Instrumentalities comprise a non-transitory computer-readable medium of claim 11, wherein the instructions further comprise: <i>See Claim 2[a].</i>

	instructions further comprise:	
12[b]	identifying a user associated with the received indication;	The Accused Instrumentalities comprise a non-transitory computer-readable medium of claim 11, wherein the instructions further comprise: identifying a user associated with the received indication. <i>See Claim 2[b]</i>
12[c]	retrieving one or more settings associated with the identified user;	The Accused Instrumentalities comprise a non-transitory computer-readable medium of claim 11, wherein the instructions further comprise: retrieving one or more settings associated with the identified user. <i>See Claim 2[c].</i>
12[d]	retrieving, from memory, content information associated with the identified user; and	The Accused Instrumentalities comprise a non-transitory computer-readable medium of claim 11, wherein the instructions further comprise: retrieving, from memory, content information associated with the identified user. <i>See Claim 2[d].</i>
12[e]	displaying, via the television, the retrieved content information in the global panel.	The Accused Instrumentalities comprise a non-transitory computer-readable medium of claim 11, wherein the instructions further comprise: displaying, via the television, the retrieved content information in the global panel. <i>See Claim 2[e].</i>
13[a]	The non-transitory computer-readable medium of	The Accused Instrumentalities comprise a non-transitory computer-readable medium of claim 11, wherein the instructions further comprise: <i>See Claim 3[a].</i>

	claim 11, wherein the instructions further comprise:	
13[b]	identifying a user associated with the received indication;	The Accused Instrumentalities comprise a non-transitory computer-readable medium of claim 11, wherein the instructions further comprise: identifying a user associated with the received indication. <i>See Claim 3[b].</i>
13[c]	retrieving, from memory, one or more settings associated with the identified user;	The Accused Instrumentalities comprise a non-transitory computer-readable medium of claim 11, wherein the instructions further comprise: retrieving, from memory, one or more settings associated with the identified user. <i>See Claim 3[c].</i>
13[d]	retrieving, from memory, content information associated with the identified user and the one or more settings associated with the user; and	The Accused Instrumentalities comprise a non-transitory computer-readable medium of claim 11, wherein the instructions further comprise: retrieving, from memory, content information associated with the identified user and the one or more settings associated with the user. <i>See Claim 3[d].</i>
13[e]	displaying, via the television, the retrieved content information in the global panel.	The Accused Instrumentalities comprise a non-transitory computer-readable medium of claim 11, wherein the instructions further comprise: displaying, via the television, the retrieved content information in the global panel. <i>See Claim 3[e].</i>

14[a]	The non-transitory computer-readable medium of claim 11, wherein the instructions further comprise:	The Accused Instrumentalities comprise a non-transitory computer-readable medium of claim 11, wherein the instructions further comprise: <i>See Claim 4[a].</i>
14[b]	receiving a second indication associated with a selection by a user;	The Accused Instrumentalities comprise a non-transitory computer-readable medium of claim 11, wherein the instructions further comprise: receiving a second indication associated with a selection by a user. <i>See Claim 4[b].</i>
14[c]	determining, based on the second indication, a source of content information to be displayed in the global panel based;	The Accused Instrumentalities comprise a non-transitory computer-readable medium of claim 11, wherein the instructions further comprise: determining, based on the second indication, a source of content information to be displayed in the global panel based. <i>See Claim 4[c].</i>
14[d]	retrieving at least a portion of content information from the determined source; and	The Accused Instrumentalities comprise a non-transitory computer-readable medium of claim 11, wherein the instructions further comprise: retrieving at least a portion of content information from the determined source. <i>See Claim 4[d].</i>

14[e]	displaying, via the television, the content information associated with the determined source.	The Accused Instrumentalities comprise a non-transitory computer-readable medium of claim 11, wherein the instructions further comprise: displaying, via the television, the content information associated with the determined source. <i>See Claim 4[e].</i>
15	The non-transitory computer-readable medium of claim 11, further comprising retrieving from memory a second content information for display in the global panel; and displaying, via the television, the retrieved first content information and the retrieved second content information in the global panel.	The Accused Instrumentalities are capable of the non-transitory computer-readable medium of claim 11, further comprising retrieving from memory a second content information for display in the global panel; and displaying, via the television, the retrieved first content information and the retrieved second content information in the global panel. <i>See Claim 4.</i>

21[a]	A system for displaying content on a television, comprising:	To the extent that the claim's preamble is determined to be a limitation or otherwise limiting, the Accused Instrumentalities are systems with a system for displaying content on a television.
21[b]	an input device associated with the television;	The Accused Instrumentalities are systems with an input device associated with the television. <i>See</i> Claim 1[b]
21[c]	a memory; and	The Accused Instrumentalities are systems with a memory. As indicated by the functionality of the Accused Instrumentalities and as will be shown further in discovery, the Accused Instrumentalities have a memory. <i>See</i> Claim 1[d]; Claim 2; Claim 3.
21[d]	a microprocessor that is programmed to:	The Accused Instrumentalities are systems with a microprocessor that is programmed. As will be shown after further discovery, the Accused Instrumentalities include a microprocessor that is capable of being used in this manner. For example, the LG OLED evo C3 77 in 4K Smart TV 2023 includes at least the α9 Gen6 AI Processor:  <i>See</i> https://www.lg.com/us/tvs/lg-oled77c3pua; <i>see also</i> https://www.lg.com/us/tvs (linking to specifications for LG TVs).
21[e]	receive an indication	The Accused Instrumentalities are capable of receiving an indication associated with a selection by a user.

	associated with a selection by a user;	<i>See</i> Claim 1[b].
21[f]	determine, based on the received indication, a global panel to display via the television;	The Accused Instrumentalities are re capable of determining, based on the received indication, a global panel to display via the television. <i>See</i> Claim 1[c].
21[g]	retrieve from the memory, a first content information for display in the global panel; and	The Accused Instrumentalities are capable of retrieving from the memory, a first content information for display in the global panel. <i>See</i> Claim 1[d].
21[h]	display, via the television, the retrieved content information in the global panel, wherein the global panel includes a list of sources of content for the intelligent television, wherein at least one of the sources is	The Accused Instrumentalities are capable of displaying, via the television, the retrieved content information in the global panel, wherein the global panel includes a list of sources of content for the intelligent television, wherein at least one of the sources is highlighted as being associated with the first content information, and wherein the sources include a live television source, a video on demand source, a media center source, an applications source, and an electrical input associated with the television. <i>See</i> Claim 1[e] – 1[f].

	highlighted as being associated with the first content information, and wherein the sources include a live television source, a video on demand source, a media center source, an applications source, and an electrical input associated with the television.	
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