

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TEXARKANA DIVISION**

MAXELL, LTD.,

Plaintiff,

v.

TCL Electronics Holdings Ltd. (f/k/a TCL Multimedia Technology Holdings, Ltd.); TCL Industries Holdings Co., Ltd.; T.C.L. Industries Holdings (H.K.) Limited; 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. 5:23-CV-00108-RWS-JBB

JURY TRIAL DEMANDED

P.R. 4-5(d) JOINT CLAIM CONSTRUCTION CHART

In accordance with P.R. 4-5(d) and the Docket Control Order (Dkt. No. 77), Plaintiff Maxell, Ltd. (“Maxell”) and Defendants TCL Electronics Holdings Ltd. (f/k/a TCL Multimedia Technology Holdings, Ltd.); TCL Industries Holdings Co., Ltd.; T.C.L. Industries Holdings (H.K.) Limited; 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.) (“TCL”) (together, the “Parties”) hereby provide this joint claim construction chart that lists the agreed terms (in Section I) and disputed terms (in Section II) prioritized and listed in the order of most importance, as agreed by the Parties, to be addressed at the *Markman* Hearing scheduled for October 17, 2024.

The claim terms listed below appear in U.S. Patent Nos. 10,375,341 (“the ’341 Patent”), 10,650,780 (the “’780 Patent”), 10,321,206 (the “’206 Patent”), 10,219,020 (the “’020 Patent”), and 7,924,366 (the “’366 Patent”).

Additionally, the Parties dispute whether the term “second display duration” in U.S. Patent No. 10,015,558 (the “’558 Patent”) is subject to prosecution history estoppel. This term was subject to briefing and argument through Defendants’ Opposed 12(b)(6) Motion for Partial Dismissal of Plaintiff’s Amended Complaint, which the Parties will rest on. *See* Dkt. Nos. 37; 65; 69.

I. AGREED CLAIM CONSTRUCTION

NO.	TERM/PATENT/CLAIM(S)	MAXELL'S PROPOSED CONSTRUCTION	TCL'S PROPOSED CONSTRUCTION	COURT'S CONSTRUCTION
1	“triggering, in response to the intermediate interface has been completely loaded, the AV application, ..., to release the AV decoder”/ “in response to the intermediate interface has been completely loaded, trigger the AV application, ... , to release an AV decoder” '206 Patent: claims 1, 9	[AGREED]	[AGREED]	Causing the current AV application occupying the decoder to release the decoder when the intermediate interface is completely loaded.

II. DISPUTED CONSTRUCTIONS

NO.	TERM/PATENT/CLAIM(S)	MAXELL'S PROPOSED CONSTRUCTION	TCL'S PROPOSED CONSTRUCTION	COURT'S CONSTRUCTION
1	“communication unit” '341 Patent: claim 3	MPF - § 112 ¶ 6 Function: transmits or receives information or commands to or from wireless control devices with or without a wireless router Structure: A LAN communication device that is connected to a wireless router	Plain and ordinary, does not require § 112 ¶ 6 treatment. But if it does require § 112 ¶ 6: Functions: (1) “executes two types of bidirectional wireless communication including first bidirectional wireless communication with a first wireless control device without	

NO.	TERM/PATENT/ CLAIM(S)	MAXELL'S PROPOSED CONSTRUCTION	TCL'S PROPOSED CONSTRUCTION	COURT'S CONSTRUCTION
		by wire or wireless and arranged to transmit or receive information to or from wireless control devices according to communication protocols, such as infrared rays, Wi-Fi Direct, Bluetooth or Wi-Fi.	going via a router and second bi-directional wireless communication via a router with a second wireless control device that is different from the first wireless control device;" and (2) "if a [first command/second command] for changing a video content on the display unit from a [first/second] video content selected by the first wireless control device to another video content is transmitted from the [second/third] wireless control device to the [communication unit via the router/infrared receiver unit by infrared rays] during the first video content is displayed on the display unit, ... send[] [first/second] information for informing termination of the displaying of the [first/second] video content [to the first wireless control device without going via a router/via the router to the second wireless control device]," Structure: indefinite for failure to recite sufficient	

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			structure for performing the functions.	
2	"interface" '206 Patent: claims 1-4, 6, 9-12, 14	Plain and ordinary meaning	Indefinite	
3	"preset intermediate interface" '206 Patent: claims 1, 9	Plain and ordinary meaning <i>e.g.</i> , an intermediate interface created prior for a particular target AV application	Indefinite	
4	"completely loaded" '206 Patent, claims 1-4, 6, 9-12, 14	Plain and ordinary meaning <i>e.g.</i> , when the frame and content are completely loaded	Indefinite	
5	"image information" '780 Patent: claims 1, 4	Plain and ordinary meaning <i>e.g.</i> , pictures and corresponding information transmitted from the image apparatus to the display apparatus	Indefinite	
6	"member" '366 Patent: claims 5, 9	Plain and ordinary meaning <i>e.g.</i> , a component or definable part	"a structural component of a frame"	

NO.	TERM/PATENT/ CLAIM(S)	MAXELL'S PROPOSED CONSTRUCTION	TCL'S PROPOSED CONSTRUCTION	COURT'S CONSTRUCTION
7	“the display screen displays a slide show at predetermined time intervals with the [first/second] still pictures, as the first/second images, based on the decoded [first/second] image information obtained by the decoder” ’780 Patent: claim 1	Plain and ordinary meaning	Indefinite	
8	“provided on” ’366 Patent: claims 5, 9	Plain and ordinary meaning <i>e.g.</i> , attached or driven through	“affixed to the surface”	
9	“operation instructions” ’020 Patent, claim 1	“information for changing the display of the second video content such as move or select operations”	“commands and instructions used to operate a computer”	

Date: October 3, 2024

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CERTIFICATE OF SERVICE

I hereby certify that all counsel of record who are deemed to have consented to electronic service are being served this 3rd day of October 2024, with a copy of this document via the Court's CM/ECF system.

/s/ Kfir B. Levy
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