

**APPENDIX 9: INFRINGEMENT CONTENTIONS APPLYING CLAIMS 11, 12, 13, 14, 15 OF U.S. PATENT NO. 10,199,072
TO 072 ACCUSED PRODUCTS**

Patent L.R. 3-1(d):

Knowledge of Infringement

Though discovery is ongoing, Defendants have been aware that operation of the 072 Accused Products infringed the '072 Patent since at least July 19, 2021, based on correspondence directed to Mr. Hwi jae Cho. See Letter from T. Yamamoto to H. Cho dated Jul. 19, 2021 (Complaint, Exhibit 2).

Inducement

Defendants engage in acts that induce the end user of the 072 Accused Products to directly infringe the asserted claims. Defendants provide the 072 Accused Products to end users, by direct sales and by placing them into the stream of commerce with features that Defendants intend to be used in an infringing manner. Defendants act in concert to provide user guides and product literature showing that Defendants intend that the infringing features, including the ability to use the 072 Accused Products to delete video information from one group but continue to include the video information in a second group, be performed by the user. User guides also show that Defendants intended and instructed end users to operate the 072 Accused Products in an infringing manner, including by providing instructions that, when followed, result in infringement. For example, Defendants instruct users on how to launch the gallery app and highlight the use of folders within the app:

Gallery

Gallery overview

You can view and manage photos and videos that are saved on your device.

1. Tap  Home >  Gallery.

▶ Saved photos and videos are displayed by folder.

lg-g8-thinq-ug, p. 101

Gallery

Gallery overview

You can view and manage photos and videos saved on your device.

1 Tap  >.

- Saved photos and videos are displayed by folders.

LG-H820_ATT_Eng_UG_D03_160316-1, p. 93

Defendants also provide instruction to the user on how to invoke the controlling process identified below in Plaintiff's Patent L.R. 3-1(c) disclosures.

Deleting files

You can delete files by using one of the following options:

- ▶ Touch and hold a file from the file list, then tap **Delete**.
- ▶ Tap  **Delete** in an album, select files you want to delete, then tap **DELETE**.
- ▶ Deleted files are automatically moved to Trash and they can be restored to Gallery within 7 days.
- ▶ In Gallery, tap **⋮ Option > Trash**. Tap  **Delete** to permanently delete the files. In this case, the files cannot be restore.

lg-g8-thinq-ug, p. 104

Deleting files

You can delete files by using one of the following options:

- Tap and hold a file from the file list, then tap **Delete**.
- Tap  from the file list, then select files.

LG-H820_ATT_Eng_UG_D03_160316-1, p. 96

A user following the instructions provided by Defendants would necessarily infringe the patent claims by invoking the claimed methods.

Discovery is ongoing, and on information and belief further discovery will produce additional marketing materials relating to each 072 Accused Product that demonstrate that Defendants marketed the 072 Accused Products so as to encourage end users to operate the devices in an infringing manner.

Contributory Infringement

Defendants infringe by contributory infringement by selling and offering for sale, and introducing into the stream of commerce into the United States, each 072 Accused Product comprising discrete and separate hardware and software components, that embody the claimed invention. They did so with knowledge of infringement, as described above. These hardware and software components,

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identified below in Plaintiff's Patent L.R. 3-1(c) disclosures, are a material part of the invention, and require only that an end user operate the software on 072 Accused Products in the manner intended by Defendants in order for infringement to occur. These components include gallery application software, identified in Plaintiff's Patent L.R. 3-1(c) disclosures, which provide for the reproduction of information stored on a recording medium. These components are a material part of the claimed invention and embody the inventive aspects thereof. Discovery is ongoing, and source code has not been produced. On information and belief, the source code used to produce the software running on the Accused Products comprises specific and discrete source code file, subroutines and/or functions that perform material and infringing steps of the asserted claims. This set of components has no substantial non-infringing use, as the combination is directed specifically to performing the steps that infringe the patent.

Patent L.R. 3-1(c)

US Patent No. 10,199,072	
Accused Products	
[11.pre] An information processing method comprising:	To the extent the preamble is construed as a limitation, the LG V60 ThinQ 5G implements an information processing method. Each of the 072 Accused Products ¹ performs an information processing method. See e.g., Technical Specification of the LG V60 ThinQ 5G available at LG's website shows that the device is an information processing apparatus that includes a processor to perform various functions (https://www.lg.com/us/cell-phones/lg-lmv600amaattcb-att-v60-thinq-5g).

¹ The 072 Accused Products are listed in the Cover Pleading for the Disclosure of Asserted Claims and Infringement Contentions (Patent L.R. 3-1) and Document Production Accompanying Disclosure (Patent L.R. 3-2).

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US Patent No. 10,199,072

Accused Products

For example, the LG V60 ThinQ 5G processes information to display a user interface.

DISCONTINUED

LG V60 ThinQ™ 5G | AT&T

★★★★★ 4.1 (258) [Write a review](#)

Key Features

- All Specs
- Ultimate multi-tasking with the LG Dual Screen™ (Sold separately)
- 6.8" OLED Display
- 8K Video Recording
- Triple Camera System: 64 MP Standard, 13 MP Ultra-Wide, Z-Camera
- All-Day 5,000 mAh Battery
- 5G Connectivity

CLASSY BLUE

Compare

TECHNICAL SPECIFICATIONS			
Platform	Standby Time	Processor	UPC
Android™ 10	up to 24.5 days*	Qualcomm Snapdragon™ 865 Octa-core	652810834308
RAM	Talk Time	**	Battery Capacity
8GB	Up to 21 hours*	Wireless charger sold separately.	5,000 mAh Non-Removable
* Actual battery time may vary depending on network connectivity and application use.	Charging	Hearing Aid Compatible	
	USB Type-C™ port; wireless charging**;	Rated for M4, T4	
	Quick Charge™ 4.0+*		

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US Patent No. 10,199,072	Accused Products
	^SUMMARY • Usable memory varies depending on software versions and settings Screen Resolution 2460 x 1080 pixels Front Camera Resolution 10MP Battery Capacity 5,000 mAh Non-Removable Memory 8GB RAM Carrier AT&T Processor Qualcomm Snapdragon™ 865 Octa-core Storage 128 GB (up to 99 GB usable)* Rear Camera Resolution 64MP (Standard Angle), 13MP (Wide Angle) https://www.lg.com/us/cell-phones/lg-lmv600amaattcb-att-v60-thinq-5g#pdp_specs PLATFORM OS Android 10, upgradable to Android 13 Chipset Qualcomm SM8250 Snapdragon 865 5G (7 nm+) CPU Octa-core (1x2.84 GHz Cortex-A77 & 3x2.42 GHz Cortex-A77 & 4x1.80 GHz Cortex-A55) GPU Adreno 650 MEMORY Card slot microSDXC (uses shared SIM slot) - dual-SIM model Internal 128GB 8GB RAM, 256GB 8GB RAM UFS 2.1 MAIN CAMERA Dual 64 MP, f/1.8, 27mm (standard), 1/1.72", 0.8µm, Dual pixel PDAF, OIS 13 MP, f/1.9, 12mm (ultrawide), 1/3.4", 1.0µm 0.3 MP, TOF 3D, f/1.4, (depth) Features Dual-LED dual-tone flash, HDR, panorama Video 8K@30fps, 4K@30/60fps, 1080p, HDR10+, 24-bit/192kHz stereo sound rec., gyro-EIS SELFIE CAMERA Single 10 MP, f/1.9, 30mm (standard), 1/3.1", 1.22µm Features HDR Video 4K@30fps, gyro-EIS https://www.gsmaarena.com/lg_v60_thinq_5g-10103.php In addition, the LG V60 ThinQ 5G User Guide shows that the LG V60 ThinQ 5G contains a front camera lens and rear camera lenses for recording video, and associated software, which in conjunction with one or more processors (e.g., CPU) processes video. 8 8 Case No. 5:24-cv-04972-EKL (N.D. Cal.) Maxell Patent L.R. 3-1 Infringement Contentions #776396080.2

APPENDIX 9: INFRINGEMENT CONTENTIONS APPLYING CLAIMS 11, 12, 13, 14, 15 OF U.S. PATENT NO. 10,199,072
TO 072 ACCUSED PRODUCTS

US Patent No. 10,199,072	Accused Products
	Parts overview The diagram illustrates the components of the LG V60 ThinQ 5G smartphone. The front view (top) labels the Earpiece, Proximity/Ambient light sensor, Microphone, Front camera lens, Volume keys (+/-), Power/Lock key, Google Assistant key, Touch screen, Fingerprint sensor, and Stereo headset jack. The back view (bottom) labels the Microphone, Rear camera lenses, Wireless charging antenna area, NFC/LG Pay touchpoint, SIM/Memory card tray, ToF sensors, Flash, Speaker, and Charger/USB cable port. A note at the bottom states: 'Press and hold the volume down key and Power/Lock key at the same time for a second to take a screenshot.' LG V60 ThinQ 5G User Guide at 26.

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US Patent No. 10,199,072	Accused Products
	The above identification of infringing processes is representative; each of the 072 Accused Products performs this limitation in substantially the same way, using an information processing method that differs in ways that are immaterial to the limitation. See Appendix 10 showing that the remaining 072 Accused Products, including processors, a camera and display that implement an information processing method.
[11.a] recording, by a recording unit, a plurality of video data on a recording medium;	Each of the 072 Accused Products performs an information processing method comprising recording, by a recording unit, a plurality of video information on a recording medium. <i>See e.g.</i>, Technical Specification of the LG V60 ThinQ 5G available at LG's website shows that the device has a recording unit such as a camera to record video using a processor on a recording medium (or memory) on the device (https://www.lg.com/us/cell-phones/lg-lmv600amaattcb-att-v60-thinq-5g). For example, the LG V60 ThinQ 5G implements an information processing method comprising a recording, by a recording unit, a plurality of video data on a recording medium. For example, the LG V60 ThinQ 5G includes a plurality of cameras that operate as individual recording units (e.g., front camera lens or rear camera lenses). The LG V60 ThinQ 5G also includes local memory such as Flash memory alone or in combination with RAM that is a recording medium for storing a plurality of video data recorded by at least one camera.

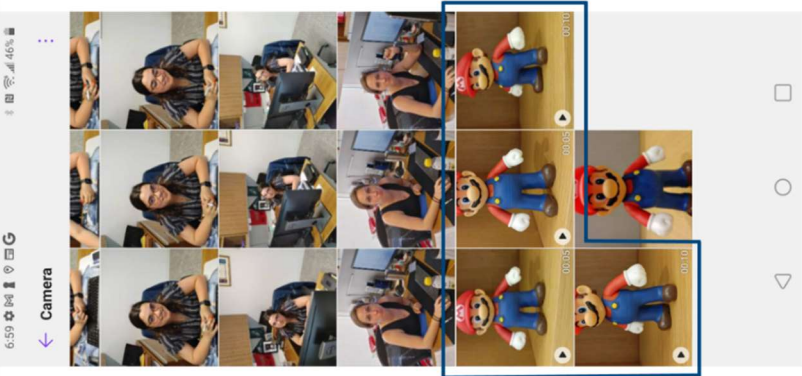
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US Patent No. 10,199,072	Accused Products
	MEMORY Card slot Internal microSDXC (uses shared SIM slot) - dual-SIM model 128GB 8GB RAM, 256GB 8GB RAM UFS 2.1 https://www.gsmarena.com/lg_v60_thinq_5g-10103.php The following screenshot illustrates the LG V60 ThinQ 5G implementation of information processing method comprising a recording, by a recording unit, a plurality of video information on a recording medium.

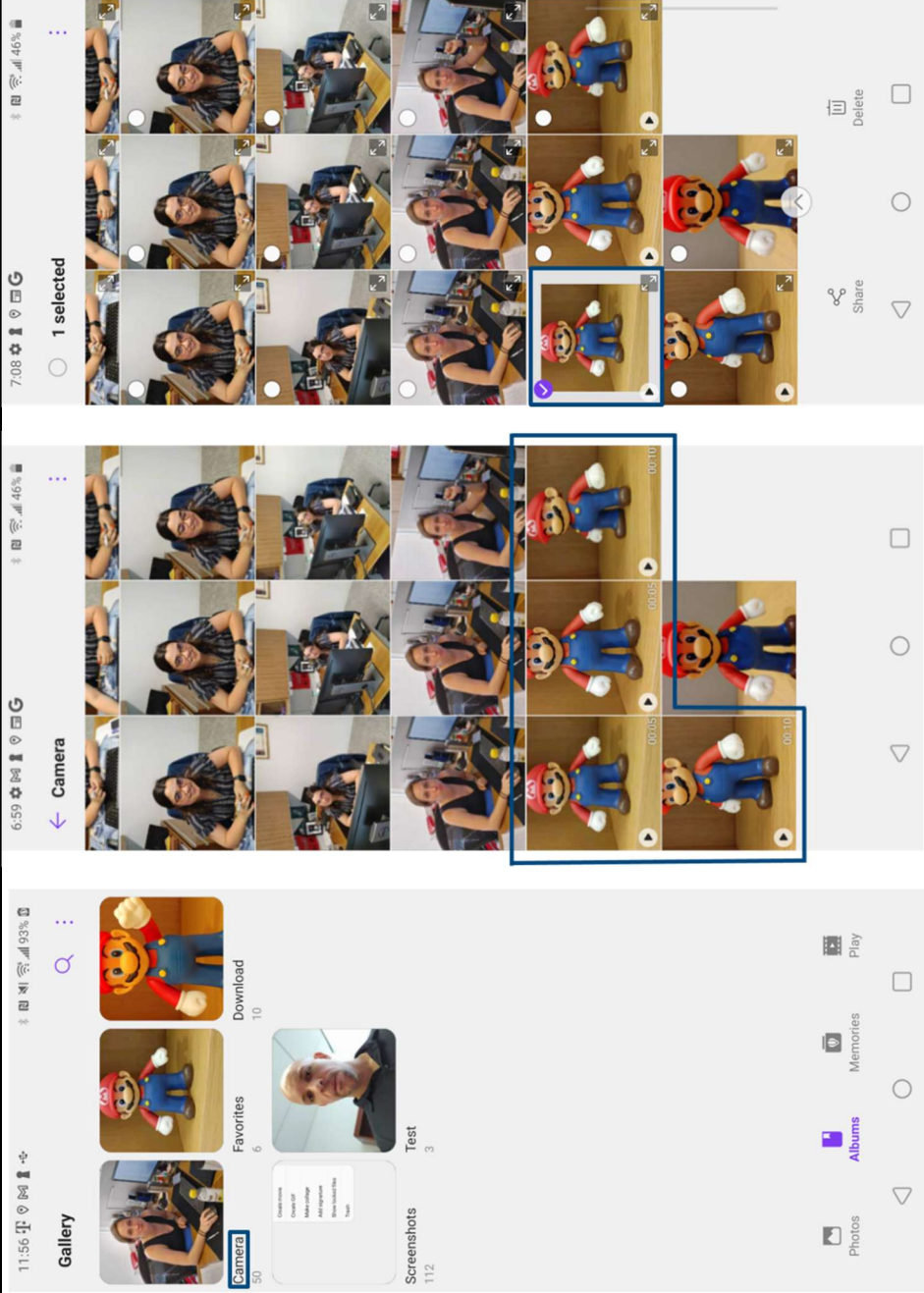
APPENDIX 9: INFRINGEMENT CONTENTIONS APPLYING CLAIMS 11, 12, 13, 14, 15 OF U.S. PATENT NO. 10,199,072
TO 072 ACCUSED PRODUCTS

US Patent No. 10,199,072	Accused Products
	 The above identification of infringing processes is representative; each of the 072 Accused Products performs this limitation in substantially the same way, using a method that differs in ways that are immaterial to the limitation. <i>See</i> Appendix 10 identifying for each of the remaining 072 Accused Products, including processors, camera, memory storage and display that record, by a recording unit, a plurality of video data on a recording medium.

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US Patent No. 10,199,072	Accused Products
	<u>Doctrine of Equivalents</u> To the extent LG Electronics argues that this limitation is not literally met in each of the 072 Accused Products, Maxell asserts that this limitation is met under the doctrine of equivalents because the identified structure matches the function, way, and result of the claimed element and, to the extent there is a difference, the difference is insubstantial. The accused products each provide a process for performing the function of recording, by a recording unit, a plurality of video data on a recording medium, which is the same function performed by this claim limitation. Each 072 Accused Product performs this function the same way as the claim limitation, by using a recording unit. Each 072 Accused Product achieves the same result as the claim limitation, of recording video data.
[11.b] outputting a menu display for a user to select one group of video data among a plurality of groups of video data by specifying a position of a character corresponding to the one group of video data;	The LG V60 ThinQ 5G implements outputting a menu display for a user to select one group of video data among a plurality of groups of video data by specifying a position of a character corresponding to the one group of video data. For example, the LG V60 ThinQ 5G outputs a menu display (e.g., “Gallery” view) for a user to select one group of video data (e.g., the video data corresponding to the “Camera” album) among a plurality of groups of video data by specifying a position of a character corresponding to the one group of video data (e.g., selecting the word “Camera,” which includes at least one character).

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US Patent No. 10,199,072	Accused Products
	Products, including, processors, camera, memory storage and display that output a menu display for a user to select one group of video data among a plurality of groups of video data by specifying a position of a character corresponding to the one group of video data. <u>Doctrine of Equivalents</u> To the extent LG Electronics argues that this limitation is not literally met in each of the 072 Accused Products, Maxell asserts that this limitation is met under the doctrine of equivalents because the identified structure matches the function, way, and result of the claimed element and, to the extent there is a difference, the difference is insubstantial. The accused products each provide a process for performing the function of outputting a menu display for a user to select one group of video data, which is the same function performed by this claim limitation. Each 072 Accused Product performs this function the same way as the claim limitation, by specifying a position of a character corresponding to the one group of video data. Each 072 Accused Product achieves the same result as the claim limitation, of outputting a menu display. The LG V60 ThinQ 5G implements reproducing selected video data read out from the recording medium. For example, the LG V60 ThinQ 5G is configured to reproduce selected video data.
[11.c] reproducing selected video data read out from the recording medium;	

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US Patent No. 10,199,072	Accused Products
	 The LG V60 ThinQ 5G also includes local memory such Flash memory alone or in combination with RAM that is a recording medium for reading out selected video data.

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US Patent No. 10,199,072	Accused Products									
	<table><tr><td>MEMORY</td><td>Card slot</td><td>microSDXC (uses shared SIM slot) - dual-SIM model</td></tr><tr><td></td><td>Internal</td><td>128GB 8GB RAM, 256GB 8GB RAM</td></tr><tr><td></td><td></td><td>UFS 2.1</td></tr></table> https://www.gsmarena.com/lg_v60_thinq_5g-10103.php. The above identification of infringing processes is representative; each of the 072 Accused Products performs this limitation in substantially the same way, using a method that differs in ways that are immaterial to the limitation. <i>See</i> Appendix 10 identifying for each of the remaining 072 Accused Products, including processors, camera, memory storage and display that reproduce selected video data read out from the recording medium. . <u>Doctrine of Equivalents</u> To the extent LG Electronics argues that this limitation is not literally met in each of the 072 Accused Products, Maxell asserts that this limitation is met under the doctrine of equivalents because the identified structure matches the function, way, and result of the claimed element and, to the extent there is a difference, the difference is insubstantial. The accused products each provide a process for performing the function of reproducing selected video data, which is the same function performed by this claim limitation. Each 072 Accused Product performs this function the same way as the claim limitation, by reading out from the recording medium. Each 072 Accused Product achieves the same result as the claim limitation, of reproducing selected video data read out from the recording medium.	MEMORY	Card slot	microSDXC (uses shared SIM slot) - dual-SIM model		Internal	128GB 8GB RAM, 256GB 8GB RAM			UFS 2.1
MEMORY	Card slot	microSDXC (uses shared SIM slot) - dual-SIM model								
	Internal	128GB 8GB RAM, 256GB 8GB RAM								
		UFS 2.1								
[11.d] controlling display, when a first group of video data is selected in the menu display by specifying a position of a character corresponding to the first group of video data, a first	The LG V60 ThinQ 5G implements a controlling display, when a first group of video data is selected in the menu display by specifying a position of a character corresponding to the first group of video data, a first group of thumbnails corresponding to the first group of video data in a state that the order of the first group of thumbnails is editable. For example, the LG V60 ThinQ 5G is configured to control a display (e.g., a CPU, processor or chipset configured to operate a touch screen).									

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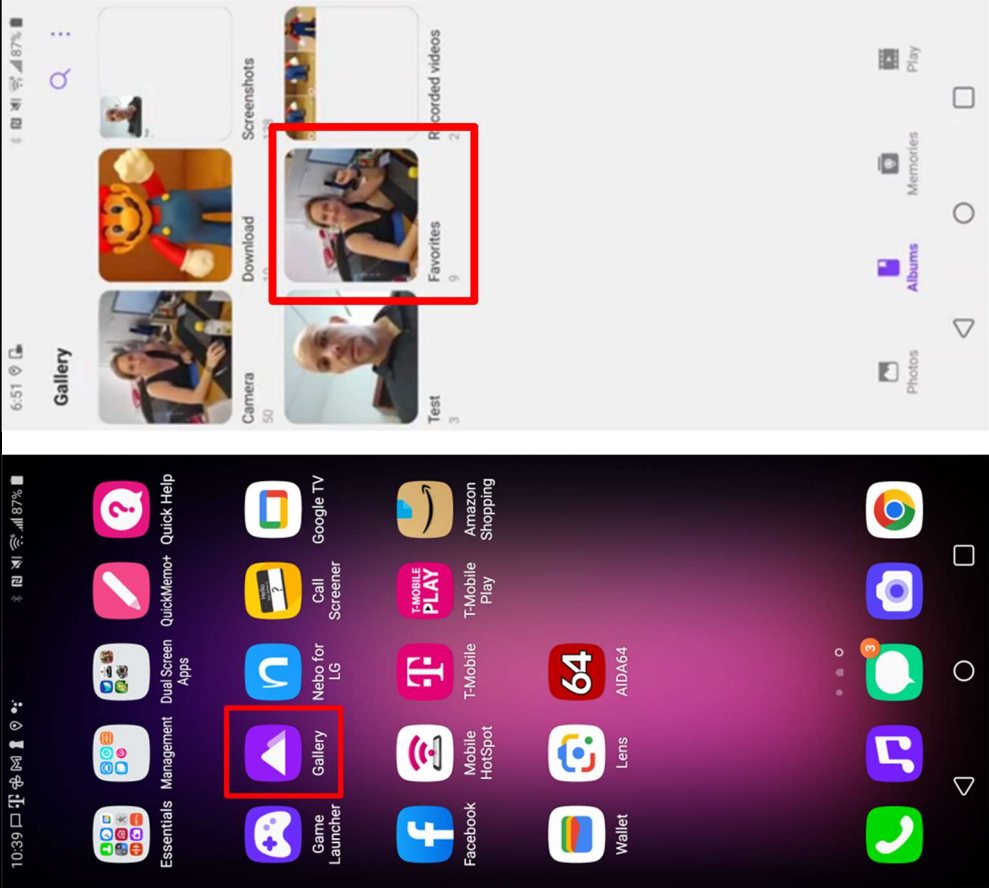
US Patent No. 10,199,072	Accused Products																
group of thumbnails corresponding to the first group of video data in a state that the order of the first group of thumbnails is editable,	<table><tr><td rowspan="4">PLATFORM</td><td>OS</td><td>Android 10, upgradable to Android 13</td></tr><tr><td>Chipset</td><td>Qualcomm SM8250 Snapdragon 865 5G (7 nm+)</td></tr><tr><td>CPU</td><td>Octa-core (1x2.84 GHz Cortex-A77 & 3x2.42 GHz Cortex-A77 & 4x1.80 GHz Cortex-A55)</td></tr><tr><td>GPU</td><td>Adreno 650</td></tr><tr><td rowspan="3">MEMORY</td><td>Card slot</td><td>microSDXC (uses shared SIM slot) - dual-SIM model</td></tr><tr><td>Internal</td><td>128GB 8GB RAM, 256GB 8GB RAM</td></tr><tr><td></td><td>UFS 2.1</td></tr></table>	PLATFORM	OS	Android 10, upgradable to Android 13	Chipset	Qualcomm SM8250 Snapdragon 865 5G (7 nm+)	CPU	Octa-core (1x2.84 GHz Cortex-A77 & 3x2.42 GHz Cortex-A77 & 4x1.80 GHz Cortex-A55)	GPU	Adreno 650	MEMORY	Card slot	microSDXC (uses shared SIM slot) - dual-SIM model	Internal	128GB 8GB RAM, 256GB 8GB RAM		UFS 2.1
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US Patent No. 10,199,072	Accused Products
	Parts overview Diagram illustrating the parts overview of the LG V60 ThinQ 5G smartphone. The components are labeled as follows: - Earpiece - Proximity/Ambient light sensor - Microphone - Front camera lens - Volume keys (+/-) - Power/Lock key - Touch screen - Fingerprint sensor - Stereo headset jack - Microphone - SIM/Memory card tray - Microphone - ToF sensors - Flash - Rear camera lenses - Wireless charging antenna area - NFC/LG Pay touchpoint - Speaker - Charger/USB cable port • Press and hold the volume down key and Power/Lock key at the same time for a second to take a screenshot. LG V60 ThinQ 5G User Guide at 26. As shown below, when a first group of video data (e.g., video data within the “Favorites” album) is selected in the menu display by specifying a position of a character corresponding to the first group of

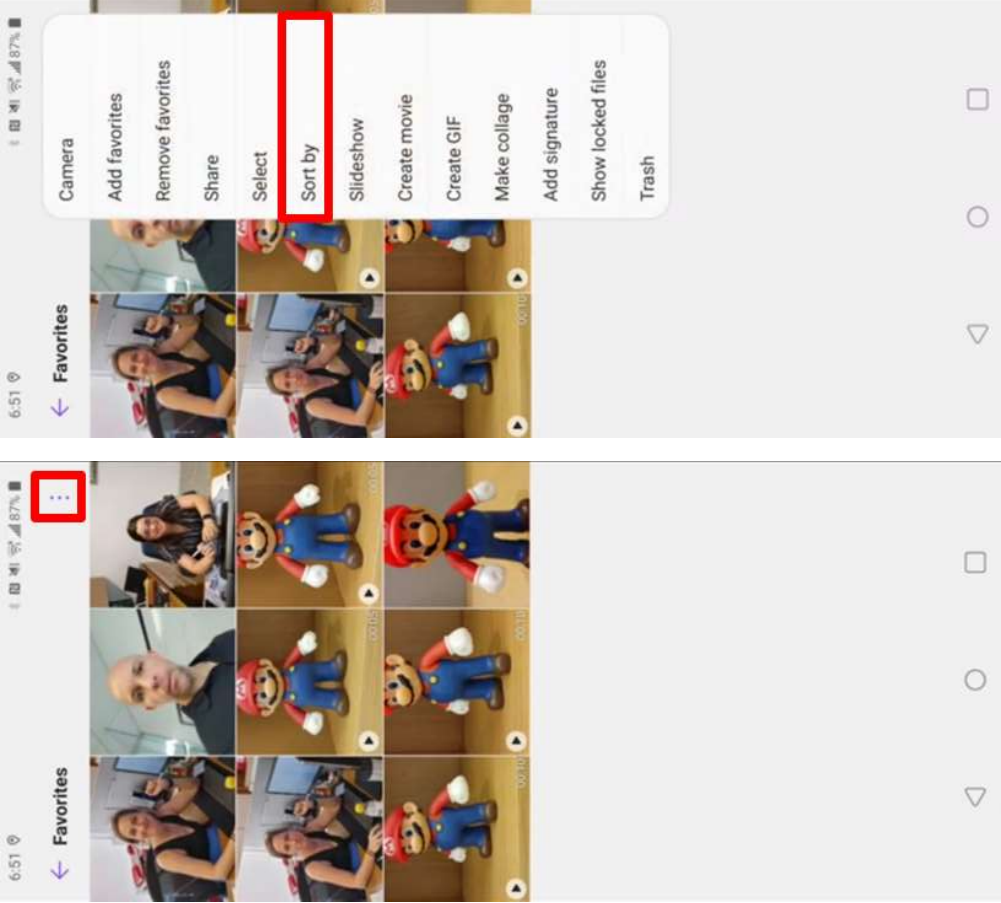
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	video data (e.g., selecting the word “Favorites,” which includes at least one character), a first group of thumbnails corresponding to the first group of video data in a state that the order of the first group of thumbnails is editable (e.g., sorting the order of thumbnails by creation date, modification date, or name).

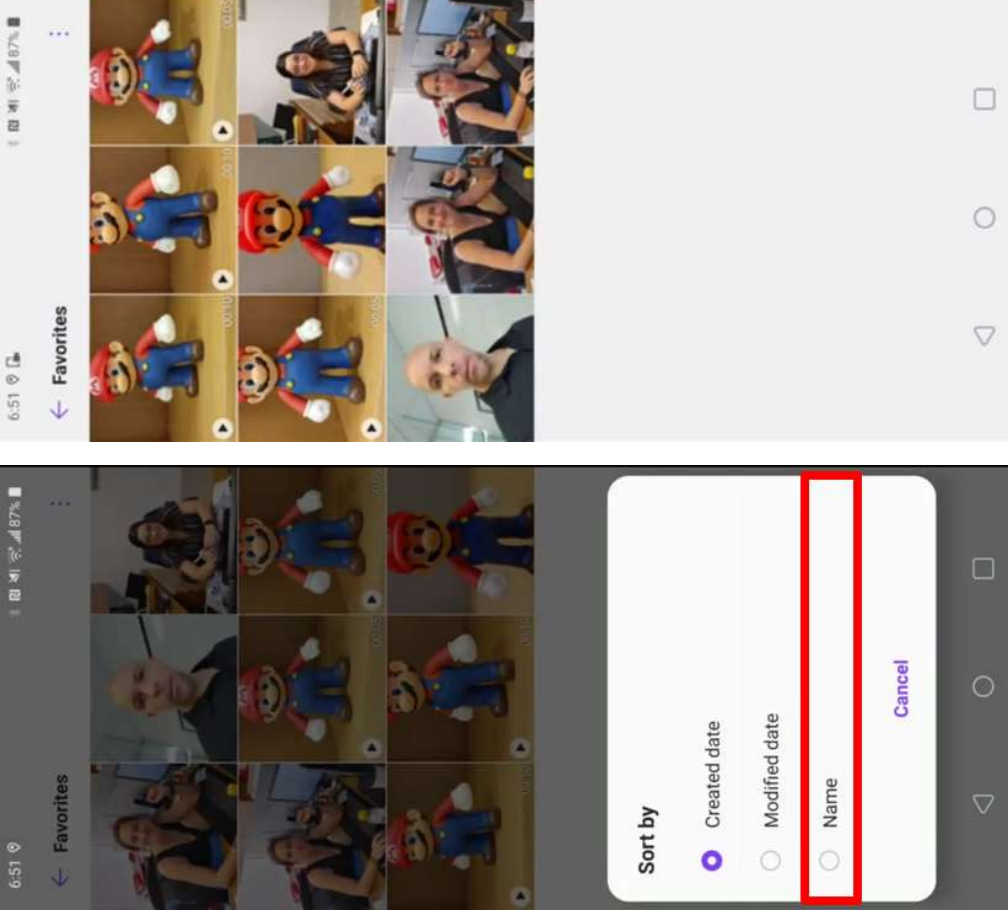
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[11.e] controlling to display, when a second group of video data is selected in the menu display by specifying a position of a character corresponding to the second group of video	The LG V60 ThinQ 5G implements controlling to display, when a second group of video data is selected in the menu display by specifying a position of a character corresponding to the second group of video data, a second group of thumbnails corresponding to the second group of video data in a state that the order of the second group of thumbnails is editable. For example, the LG V60 ThinQ 5G is configured to control a display (e.g., a CPU configured to operate a touch screen).

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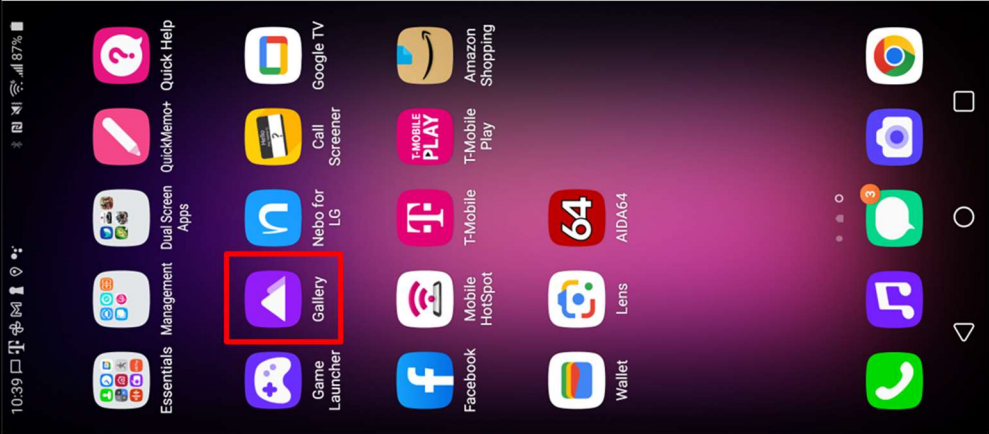
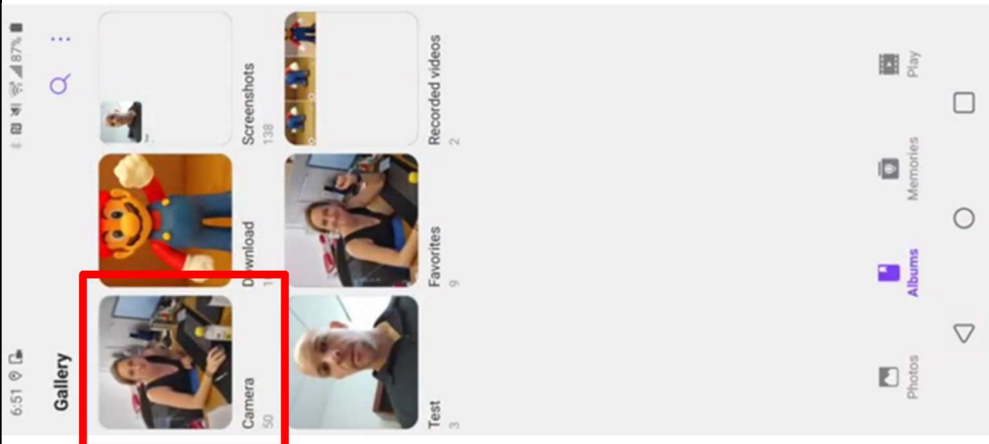
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PLATFORM	OS Android 10, upgradable to Android 13														
Chipset	Qualcomm SM8250 Snapdragon 865 5G (7 nm+)														
CPU	Octa-core (1x2.84 GHz Cortex-A77 & 3x2.42 GHz Cortex-A77 & 4x1.80 GHz Cortex-A55)														
GPU	Adreno 650														
MEMORY	Card slot microSDXC (uses shared SIM slot) - dual-SIM model														
	Internal 128GB 8GB RAM, 256GB 8GB RAM														
	UFS 2.1														

US Patent No. 10,199,072	Accused Products
	Parts overview The diagram illustrates the components of the LG V60 ThinQ 5G smartphone. The front view (top) labels the Earpiece, Proximity/Ambient light sensor, Microphone, Front camera lens, Volume keys (+/-), Power/Lock key, Touch screen (highlighted with a blue box), Fingerprint sensor, and Stereo headset jack. The back view (bottom) labels the Microphone, SIM/Memory card tray, ToF sensors, Flash, Rear camera lenses, Wireless charging antenna area, NFC/LG Pay touchpoint, and Speaker. A note at the bottom right states: 'Press and hold the volume down key and Power/Lock key at the same time for a second to take a screenshot.' LG V60 ThinQ 5G User Guide at 26. As shown below, when a second group of video data (e.g., video data within the “Camera” album) is selected in the menu display by specifying a position of a character corresponding to the second group

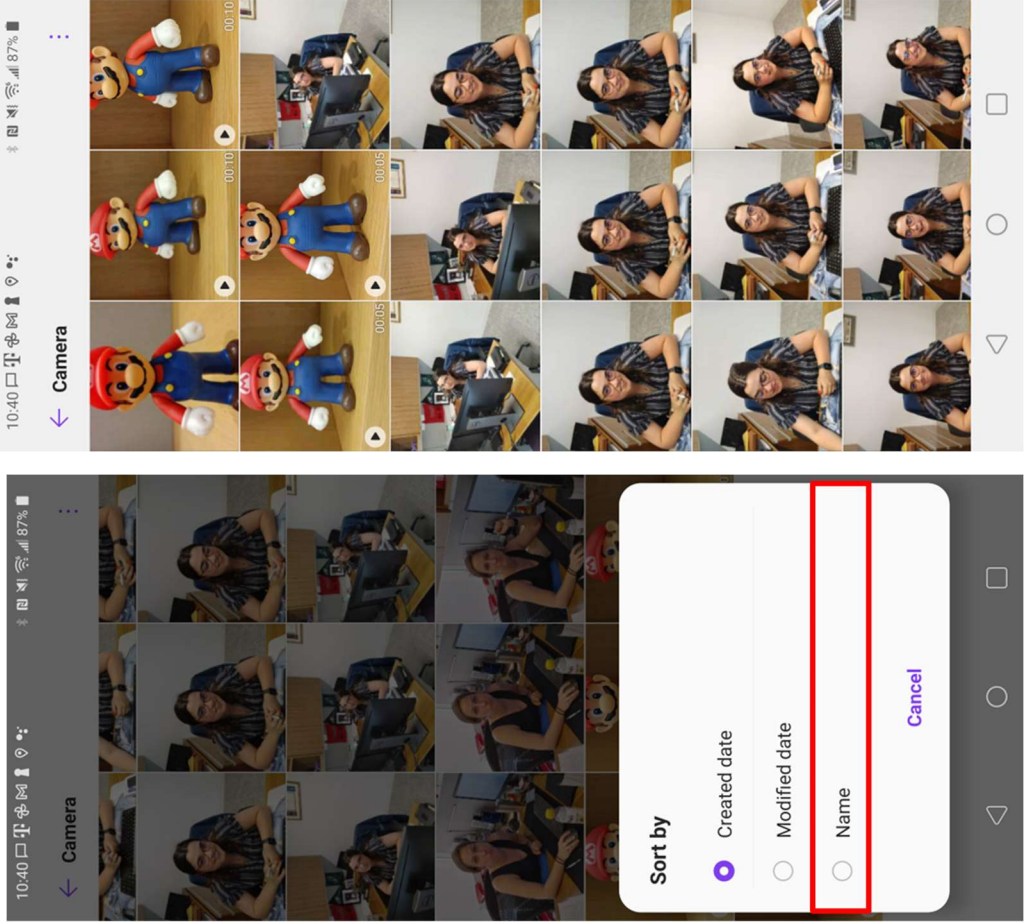
**APPENDIX 9: INFRINGEMENT CONTENTIONS APPLYING CLAIMS 11, 12, 13, 14, 15 OF U.S. PATENT NO. 10,199,072
TO 072 ACCUSED PRODUCTS**

US Patent No. 10,199,072	Accused Products
	of video data (e.g., selecting the word “Camera,” which includes at least one character), a second group of thumbnails corresponding to the second group of video data in a state that the order of the second group of thumbnails is editable (e.g., sorting the order of thumbnails by creation date, modification date, or name):

APPENDIX 9: INFRINGEMENT CONTENTIONS APPLYING CLAIMS 11, 12, 13, 14, 15 OF U.S. PATENT NO. 10,199,072
TO 072 ACCUSED PRODUCTS

US Patent No. 10,199,072	Accused Products
	 

APPENDIX 9: INFRINGEMENT CONTENTIONS APPLYING CLAIMS 11, 12, 13, 14, 15 OF U.S. PATENT NO. 10,199,072
TO 072 ACCUSED PRODUCTS

US Patent No. 10,199,072	Accused Products
	

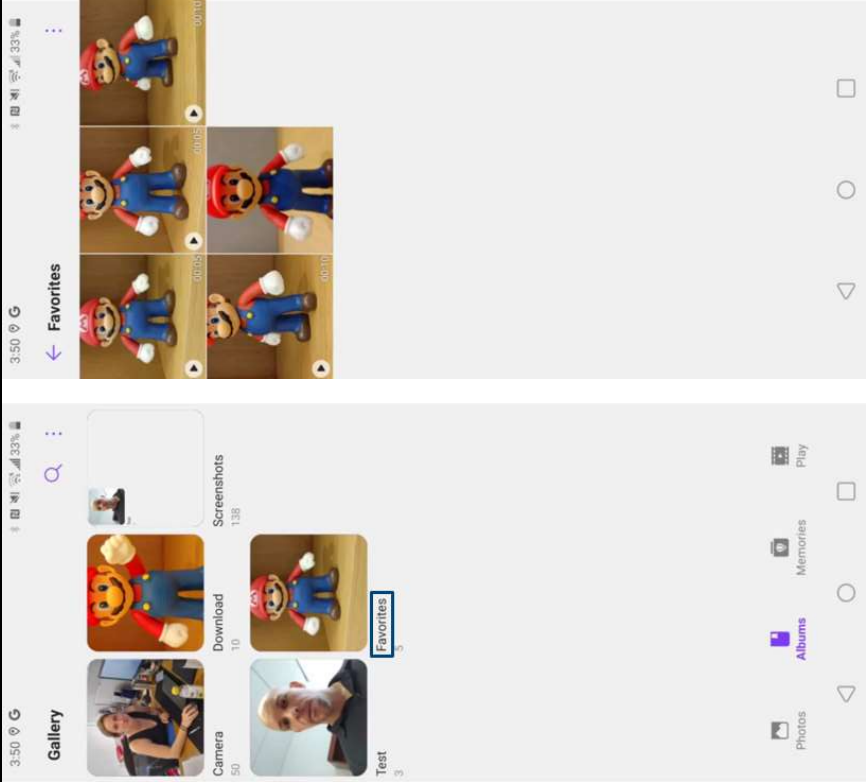
**APPENDIX 9: INFRINGEMENT CONTENTIONS APPLYING CLAIMS 11, 12, 13, 14, 15 OF U.S. PATENT NO. 10,199,072
TO 072 ACCUSED PRODUCTS**

US Patent No. 10,199,072	Accused Products
	The above identification of infringing processes is representative; each of the 072 Accused Products performs this limitation in substantially the same way, using a method that differs in ways that are immaterial to the limitation. See Appendix 10 identifying for each of the remaining 072 Accused Products, including processors, camera, memory storage and display that control to display, when a second group of video data is selected in the menu display by specifying a position of a character corresponding to the second group of video data, a second group of thumbnails corresponding to the second group of video data in a state that the order of the second group of thumbnails is editable. <u>Doctrine of Equivalents</u> To the extent LG Electronics argues that this limitation is not literally met in each of the 072 Accused Products, Maxell asserts that this limitation is met under the doctrine of equivalents because the identified structure matches the function, way, and result of the claimed element and, to the extent there is a difference, the difference is insubstantial. The accused products each provide a process for performing the function of controlling display, which is the same function performed by this claim limitation. Each 072 Accused Product performs this function the same way as the claim limitation, by specifying a position of a character corresponding to the second group of video data, a second group of thumbnails corresponding to the second group of video data in a state that the order of the second group of thumbnails is editable. Each 072 Accused Product achieves the same result as the claim limitation, of display control.
[11.f] wherein, when one video data recorded on the recording medium that is included in both the first group of video data and the second group of video data is deleted from the first group of video data, the	The LG V60 ThinQ 5G implements an information processing method, wherein, when one video data recorded on the recording medium that is included in both the first group of video data and the second group of video data is deleted from the first group of video data, the controller continues to include the one video data in the second group of video data, and a thumbnail corresponding to the one video data is displayed as one of the thumbnails of the second group of thumbnails when the controller controls to display the second group of thumbnails.

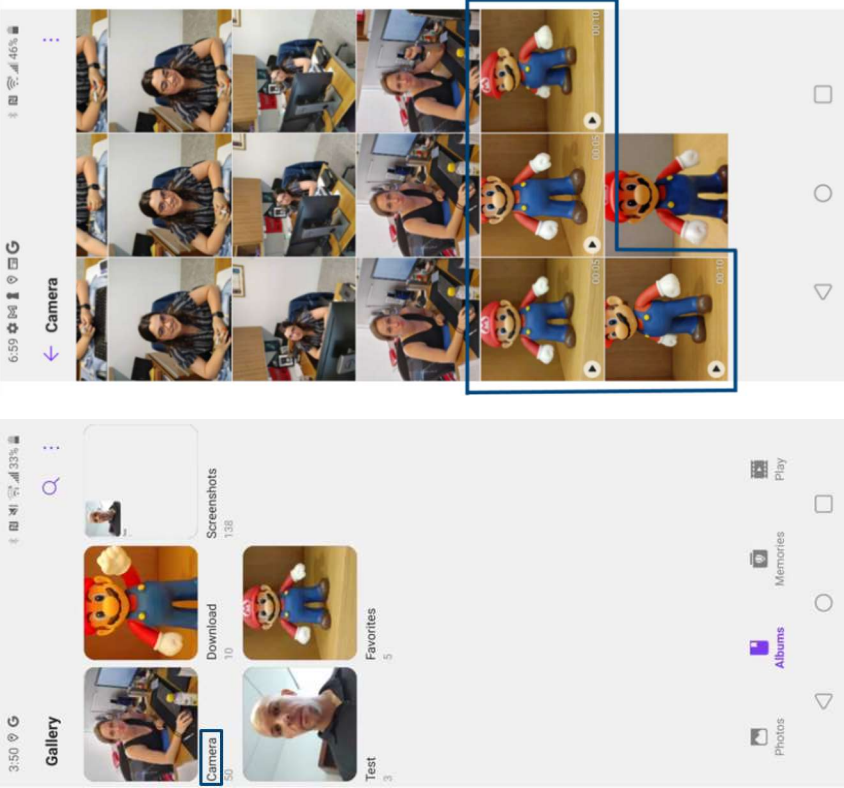
**APPENDIX 9: INFRINGEMENT CONTENTIONS APPLYING CLAIMS 11, 12, 13, 14, 15 OF U.S. PATENT NO. 10,199,072
TO 072 ACCUSED PRODUCTS**

US Patent No. 10,199,072	Accused Products
controller continues to include the one video data in the second group of video data, and a thumbnail corresponding to the one video data is displayed as one of the thumbnails of the second group of thumbnails when the controller controls to display the second group of thumbnails.	For example, the LG V60 ThinQ 5G is configured to implement a method comprising the step of deleting the first group of video data recorded on the recording medium that is included in both the first group of video data (e.g., the video data within the “Favorites” album) and the second group of video data (e.g., the video data within the “Camera” album). <i>First Group of Video Data</i>

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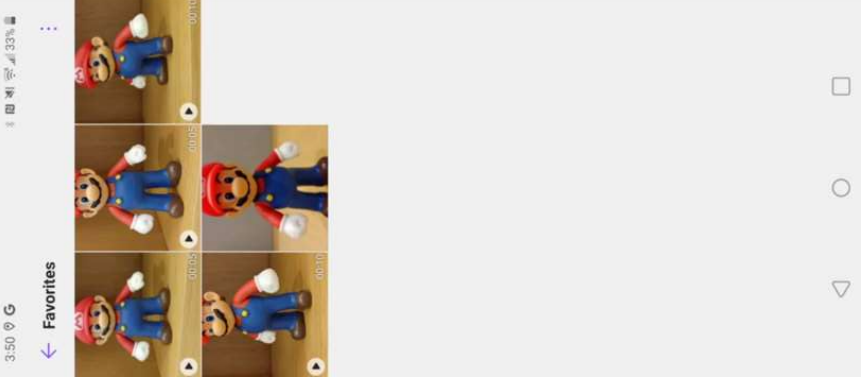
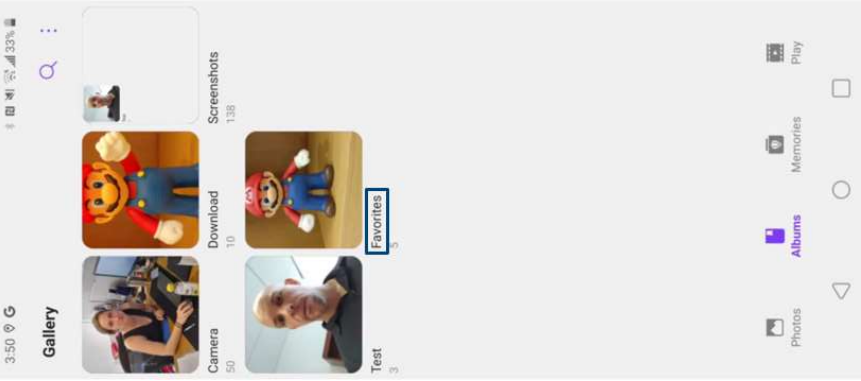
US Patent No. 10,199,072	Accused Products
	 <i>Second Group of Video Data</i>

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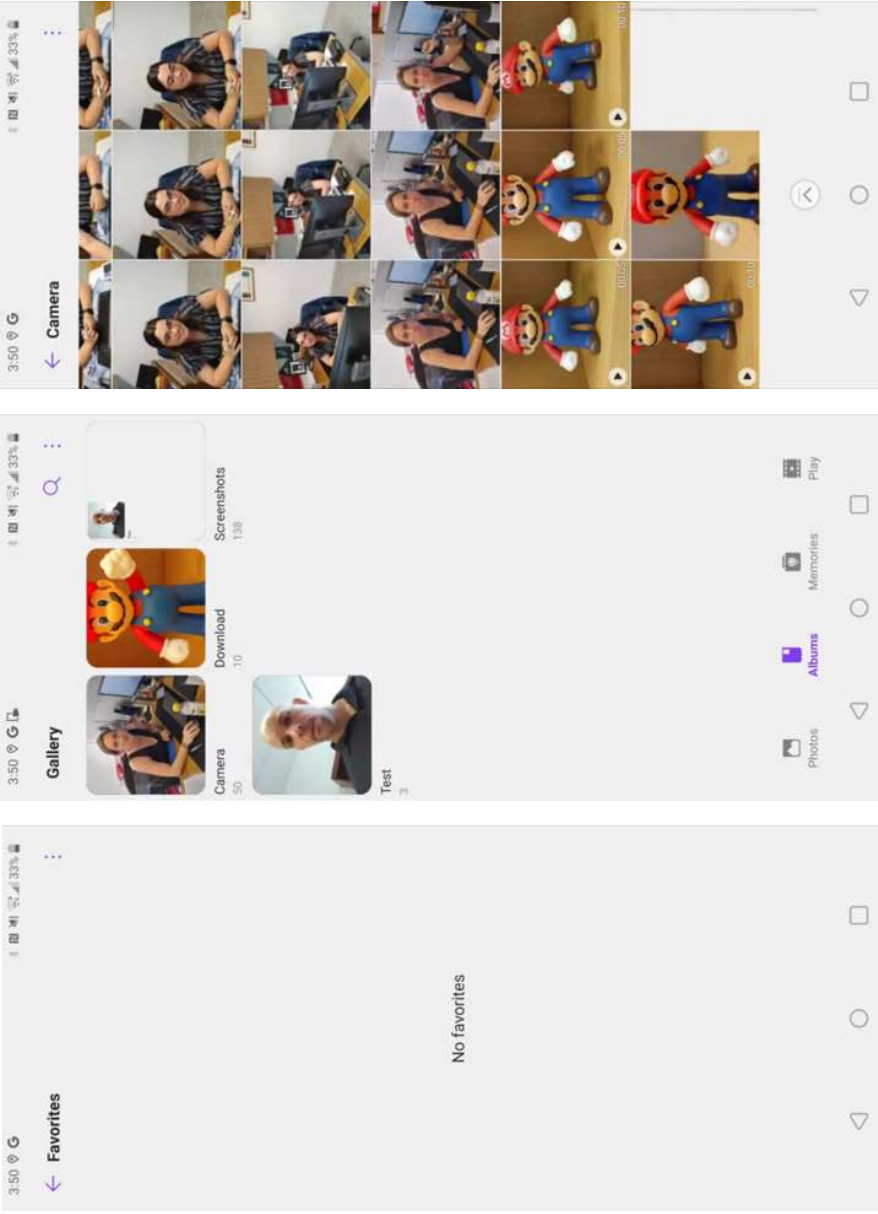
US Patent No. 10,199,072	Accused Products
	 The image displays two screenshots from an Android phone's gallery application. The left screenshot shows the 'Camera' album selected, displaying a grid of photos. The right screenshot shows a video player interface with a grid of video thumbnails, including Mario characters.

Steps of Deleting the First Group of Video Data

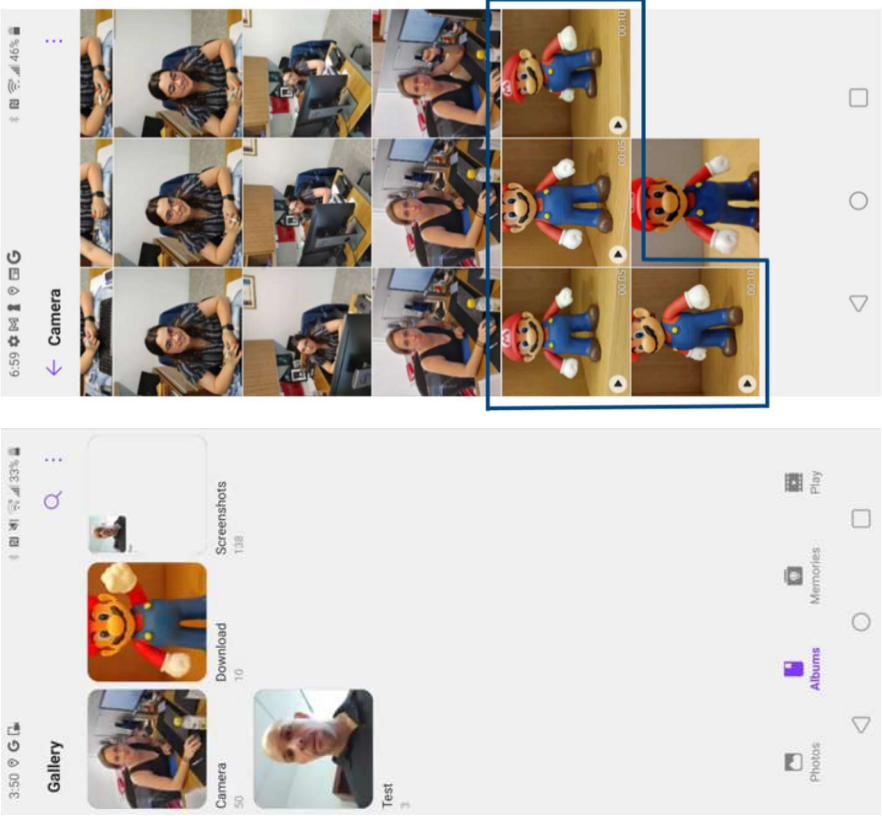
APPENDIX 9: INFRINGEMENT CONTENTIONS APPLYING CLAIMS 11, 12, 13, 14, 15 OF U.S. PATENT NO. 10,199,072
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	 Deselecting the "star" deletes the video data from the "Favorites" album

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TO 072 ACCUSED PRODUCTS

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	 As shown in the last screenshot of the <i>Steps of Deleting the First Group of Video Information</i> the controller (i.e., CPU, processor or chipset) continues to include the one video data in the second group of video data (e.g., the video data within the “Camera” album), and a thumbnail corresponding to the one video data is displayed as one of the thumbnails of the second group of thumbnails (e.g., the

APPENDIX 9: INFRINGEMENT CONTENTIONS APPLYING CLAIMS 11, 12, 13, 14, 15 OF U.S. PATENT NO. 10,199,072
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	“Camera” album thumbnail) when the controller controls to display the second group of thumbnails, even after the first group of video data (i.e., the “Favorites” album) was deleted. 

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TO 072 ACCUSED PRODUCTS**

US Patent No. 10,199,072	Accused Products
	The above identification of infringing processes is representative; each of the 072 Accused Products performs this limitation in substantially the same way, using a method that differs in ways that are immaterial to the limitation. <i>See</i> Appendix 10 identifying for each of the remaining 072 Accused Products, including processors, camera, memory storage and display that has a controller that continues to include the one video data in the second group of video data, and a thumbnail corresponding to the one video data is displayed as one of the thumbnails of the second group of thumbnails when the controller controls to display the second group of thumbnails when one video data recorded on the recording medium that is included in both the first group of video data and the second group of video data is deleted from the first group of video data. <u>Doctrine of Equivalents</u> To the extent LG Electronics argues that this limitation is not literally met in each of the 072 Accused Products, Maxell asserts that this limitation is met under the doctrine of equivalents because the identified structure matches the function, way, and result of the claimed element and, to the extent there is a difference, the difference is insubstantial. The accused products each provide a process for performing the function of the controller continuing to include the one video data, which is the same function performed by this claim limitation. Each 072 Accused Product performs this function the same way as the claim limitation, by using a controller. Each 072 Accused Product achieves the same result as the claim limitation, of continuing to include the one video data in the second group of video data, and a thumbnail corresponding to the one video data is displayed as one of the thumbnails of the second group of thumbnails when the controller controls to display the second group of thumbnails when one video data recorded on the recording medium that is included in both the first group of video data and the second group of video data is deleted from the first group of video data.
[12] The information processing method according to claim 11, further comprising	The LG V60 ThinQ 5G implements an information processing method according to claim 11, further comprising encoding inputted video data with an encoder, and storing the plurality of video data encoded by the encoder on the recording medium. <i>See supra</i> Claim 11.

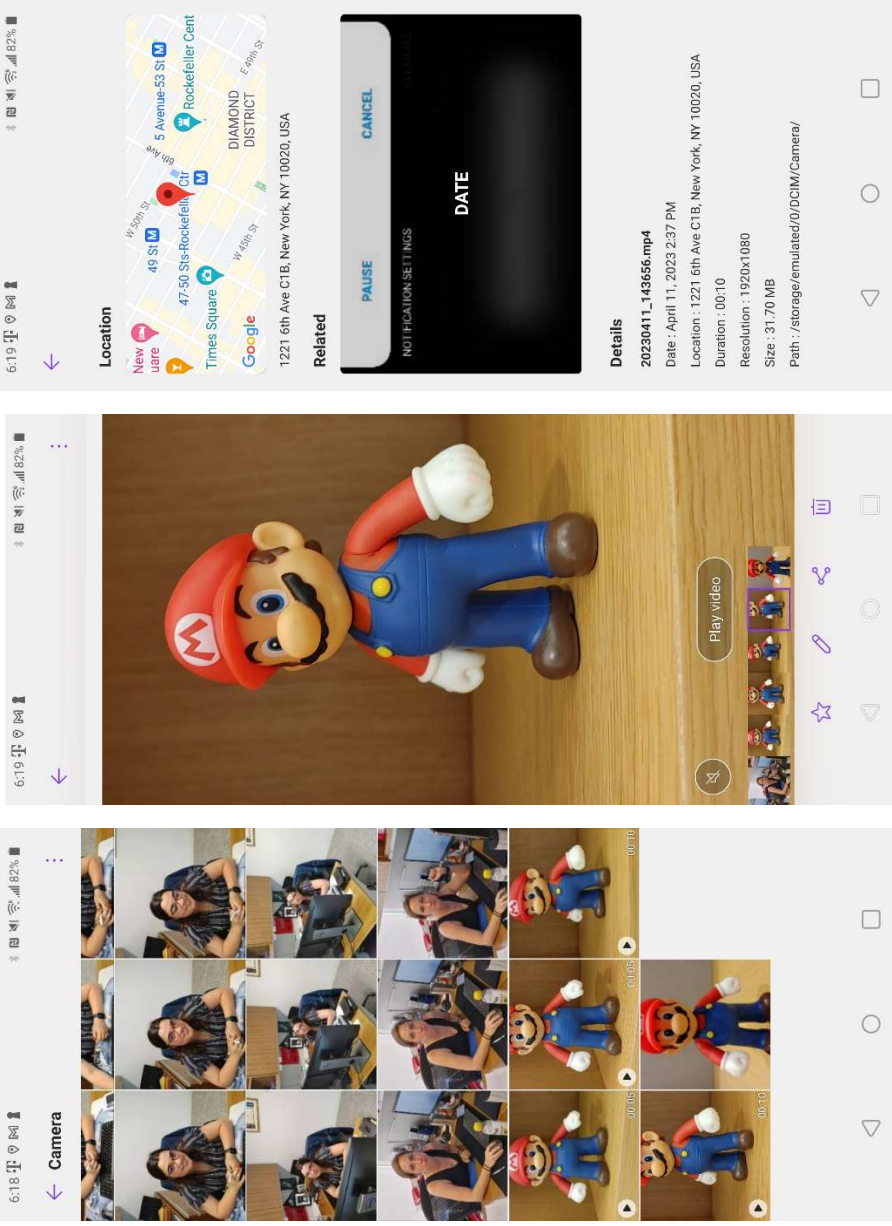
APPENDIX 9: INFRINGEMENT CONTENTIONS APPLYING CLAIMS 11, 12, 13, 14, 15 OF U.S. PATENT NO. 10,199,072
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US Patent No. 10,199,072	Accused Products
encoding inputted video data with an encoder, and storing the plurality of video data encoded by the encoder on the recording medium.	For example, the LG V60 ThinQ 5G uses a Qualcomm Snapdragon 865 Octa-Core Processor which supports a Hardware-accelerated H.265 encoder:  The advertisement for the LG V60 ThinQ 5G features three smartphones in purple, blue, and black. To the right, a list of features is presented with icons: DUAL SCREEN (360° Freestop Hinge Detachable Case, Ultimate Multitasking for Gaming, Entertainment, and Camera, 6.8" OLED FHD+ Cinematic FullVision™ Displays 20.5:9 (2460 x 1080)), UNPARALLELED VIDEO & AUDIO (8K and HDR10+ Video Recording, 4 Microphones for Voice Bokeh and ASMR Recording, 32 Bit Hi-Fi Quad DAC), AMAZING CAMERA (Triple Rear Cameras: 64 MP Standard, 13 MP Wide-Angle & 2x Camera, 10 MP Front-Facing Camera), LEADING PERFORMANCE (5,000 mAh Battery, Qualcomm® Quick Charge™ 4.0+), and 5G CONNECTIVITY (Qualcomm Snapdragon™ 865 Octa-Core Processor). The Qualcomm logo is highlighted with a red box. The LG logo is at the bottom right, and the URL www.lg.com/us/v60_thinq is at the bottom. https://www.lg.com/us/mobile-phones/v60-thinq-dual-screen/assets/pdf/Specs_LG_V60_ThinQ_DualScreen_Generic_0316.pdf

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	Visual Subsystem • Adreno 650 GPU • Vulkan® 1.1 API support • HDR gaming (10-bit color depth, Rec. 2020 color gamut) • Physically Based Rendering • API Support: OpenGL® ES 3.2, OpenCL™ 2.0 FP, Vulkan 1.1 • Hardware-accelerated H.265 and VP9 decoder • HDR Playback Codec support for HDR10+, HDR10, HLG and Dolby Vision https://www.qualcomm.com/content/dam/qcomm-martech/dm-assets/documents/prod_brief_qcom_sd865_5g.pdf The LG V60 ThinQ 5G is configured to encode inputted video data into .mp4 format, as shown below.

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	 The LG V60 ThinQ 5G also includes local memory such as Flash memory alone or in combination with RAM that is a recording medium for storing a plurality of video data encoded by the encoder.

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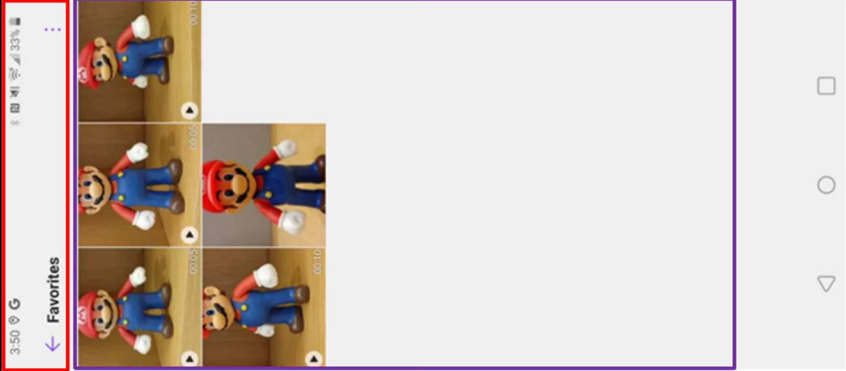
US Patent No. 10,199,072	Accused Products									
	<table><tr><td>MEMORY</td><td>Card slot</td><td>microSDXC (uses shared SIM slot) - dual-SIM model</td></tr><tr><td></td><td>Internal</td><td>128GB 8GB RAM, 256GB 8GB RAM</td></tr><tr><td></td><td></td><td>UFS 2.1</td></tr></table> https://www.gsmarena.com/lg_v60_thinq_5g-10103.php. The above identification of infringing processes is representative; each of the 072 Accused Products performs this limitation in substantially the same way, using a method that differs in ways that are immaterial to the limitation. <i>See</i> Appendix 10 identifying for each of the remaining 072 Accused Products, including processors, camera, memory storage and display that has an encoder for encoding inputted video data, and storing the plurality of video data encoded by the encoder on the recording medium. . <u>Doctrine of Equivalents</u> To the extent LG Electronics argues that this limitation is not literally met in each of the 072 Accused Products, Maxell asserts that this limitation is met under the doctrine of equivalents because the identified structure matches the function, way, and result of the claimed element and, to the extent there is a difference, the difference is insubstantial. The accused products each provide a process for performing the function of encoding inputted video data, which is the same function performed by this claim limitation. Each 072 Accused Product performs this function the same way as the claim limitation, by using an encoder. Each 072 Accused Product achieves the same result as the claim limitation, of inputted video data with an encoder, and storing the plurality of video data encoded by the encoder on the recording medium.	MEMORY	Card slot	microSDXC (uses shared SIM slot) - dual-SIM model		Internal	128GB 8GB RAM, 256GB 8GB RAM			UFS 2.1
MEMORY	Card slot	microSDXC (uses shared SIM slot) - dual-SIM model								
	Internal	128GB 8GB RAM, 256GB 8GB RAM								
		UFS 2.1								
[13.pre] The information processing method according to claim 12, further comprising:	To the extent the preamble is construed as a limitation, the LG V6) ThinQ 5G implements an information processing method according to claim 12. <i>See supra</i> Claim 12.									

APPENDIX 9: INFRINGEMENT CONTENTIONS APPLYING CLAIMS 11, 12, 13, 14, 15 OF U.S. PATENT NO. 10,199,072
TO 072 ACCUSED PRODUCTS

US Patent No. 10,199,072	Accused Products																
[13.a] controlling, by the controller, to display a first character corresponding to the first group of video data in a first area when the first group of video thumbnails is displayed; and	The LG V60 ThinQ 5G implements an information processing method comprising a controlling, by the controller, to display a first character corresponding to the first group of video data in a first area when the first group of thumbnails is displayed. For example, the LG V60 ThinQ 5G is configured to implement a method comprising controlling, by the controller (e.g., CPU, processor or chipset), to display (via a touch screen) a first character (the word “Favorites,” which includes at least one character) corresponding to the first group of video data (e.g., the video data within the “Favorites” album) in a first area (e.g., header for “Favorites” album) when the first group of thumbnails is displayed. <table><tr><td rowspan="4">PLATFORM</td><td>OS</td><td>Android 10, upgradable to Android 13</td></tr><tr><td>Chipset</td><td>Qualcomm SM8250 Snapdragon 865 5G (7 nm+)</td></tr><tr><td>CPU</td><td>Octa-core (1x2.84 GHz Cortex-A77 & 3x2.42 GHz Cortex-A77 & 4x1.80 GHz Cortex-A55)</td></tr><tr><td>GPU</td><td>Adreno 650</td></tr><tr><td rowspan="3">MEMORY</td><td>Card slot</td><td>microSDXC (uses shared SIM slot) - dual-SIM model</td></tr><tr><td>Internal</td><td>128GB 8GB RAM, 256GB 8GB RAM</td></tr><tr><td></td><td>UFS 2.1</td></tr></table> https://www.gsmarena.com/lg_v60_thinq_5g-10103.php	PLATFORM	OS	Android 10, upgradable to Android 13	Chipset	Qualcomm SM8250 Snapdragon 865 5G (7 nm+)	CPU	Octa-core (1x2.84 GHz Cortex-A77 & 3x2.42 GHz Cortex-A77 & 4x1.80 GHz Cortex-A55)	GPU	Adreno 650	MEMORY	Card slot	microSDXC (uses shared SIM slot) - dual-SIM model	Internal	128GB 8GB RAM, 256GB 8GB RAM		UFS 2.1
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	Chipset		Qualcomm SM8250 Snapdragon 865 5G (7 nm+)														
	CPU		Octa-core (1x2.84 GHz Cortex-A77 & 3x2.42 GHz Cortex-A77 & 4x1.80 GHz Cortex-A55)														
	GPU	Adreno 650															
MEMORY	Card slot	microSDXC (uses shared SIM slot) - dual-SIM model															
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		UFS 2.1															

US Patent No. 10,199,072	Accused Products
	Parts overview The diagram illustrates the components of the LG V60 ThinQ 5G smartphone. The front view (top) shows the earpiece, microphone, proximity/ambient light sensor, front camera lens, volume keys (+/-), Google Assistant key, power/lock key, touch screen (highlighted with a blue box), fingerprint sensor, and stereo headset jack. The back view (bottom) shows the microphone, SIM/memory card tray, ToF sensors, flash, rear camera lenses, wireless charging antenna area, NFC/LG Pay touchpoint, and speaker. A note at the bottom right states: 'Press and hold the volume down key and Power/Lock key at the same time for a second to take a screenshot.' LG V60 ThinQ 5G User Guide at 26.

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TO 072 ACCUSED PRODUCTS

US Patent No. 10,199,072	Accused Products
	 First character in first area First group of thumbnails in second area The above identification of infringing processes is representative; each of the 072 Accused Products performs this limitation in substantially the same way, using a method that differs in ways that are immaterial to the limitation. See Appendix 10 identifying for each of the remaining 072 Accused Products, including processors, camera, memory storage and display that has a controller for displaying

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	a first character corresponding to the first group of video data in a first area when the first group of thumbnails is displayed. <u>Doctrine of Equivalents</u> To the extent LG Electronics argues that this limitation is not literally met in each of the 072 Accused Products, Maxell asserts that this limitation is met under the doctrine of equivalents because the identified structure matches the function, way, and result of the claimed element and, to the extent there is a difference, the difference is insubstantial. The accused products each provide a process for performing the function of controlling to display, which is the same function performed by this claim limitation. Each 072 Accused Product performs this function the same way as the claim limitation, by using controller. Each 072 Accused Product achieves the same result as the claim limitation, of displaying a first character corresponding to the first group of video data in a first area when the first group of thumbnails is displayed.
[13.b] controlling, by the controller, to display a second character corresponding to the second group of video data in the first area when the second group of thumbnails is displayed.	The LG V60 ThinQ 5G implements an information processing method comprising a controlling, by the controller, to display a second character corresponding to the second group of video data in the first area when the second group of thumbnails is displayed. For example, the LG V60 ThinQ 5G is configured to implement a method comprising controlling, by the controller (e.g., CPU, processor or chipset), to display (via a touch screen) a second character (the word “Camera,” which includes at least one character) corresponding to the second group of video data (e.g., the video data within the “Camera” album) in a first area (e.g., header for “Camera” album) when the second group of thumbnails is displayed.

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	<table><tr><td>PLATFORM</td><td>OS Android 10, upgradable to Android 13</td></tr><tr><td>Chipset</td><td>Qualcomm SM8250 Snapdragon 865 5G (7 nm+)</td></tr><tr><td>CPU</td><td>Octa-core (1x2.84 GHz Cortex-A77 & 3x2.42 GHz Cortex-A77 & 4x1.80 GHz Cortex-A55)</td></tr><tr><td>GPU</td><td>Adreno 650</td></tr><tr><td>MEMORY</td><td>Card slot microSDXC (uses shared SIM slot) - dual-SIM model</td></tr><tr><td></td><td>Internal 128GB 8GB RAM, 256GB 8GB RAM</td></tr><tr><td></td><td>UFS 2.1</td></tr></table> https://www.gsmarena.com/lg_v60_thinq_5g-10103.php	PLATFORM	OS Android 10, upgradable to Android 13	Chipset	Qualcomm SM8250 Snapdragon 865 5G (7 nm+)	CPU	Octa-core (1x2.84 GHz Cortex-A77 & 3x2.42 GHz Cortex-A77 & 4x1.80 GHz Cortex-A55)	GPU	Adreno 650	MEMORY	Card slot microSDXC (uses shared SIM slot) - dual-SIM model		Internal 128GB 8GB RAM, 256GB 8GB RAM		UFS 2.1
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US Patent No. 10,199,072	Accused Products
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TO 072 ACCUSED PRODUCTS

US Patent No. 10,199,072	Accused Products
	3:50 5G ← Camera ⋮  Second character in first area Second group of thumbnails in second area The above identification of infringing processes is representative; each of the 072 Accused Products performs this limitation in substantially the same way, using a method that differs in ways that are immaterial to the limitation. See Appendix 10 identifying for each of the remaining 072 Accused Products, including processors, camera, memory storage and display that has a controller for displaying

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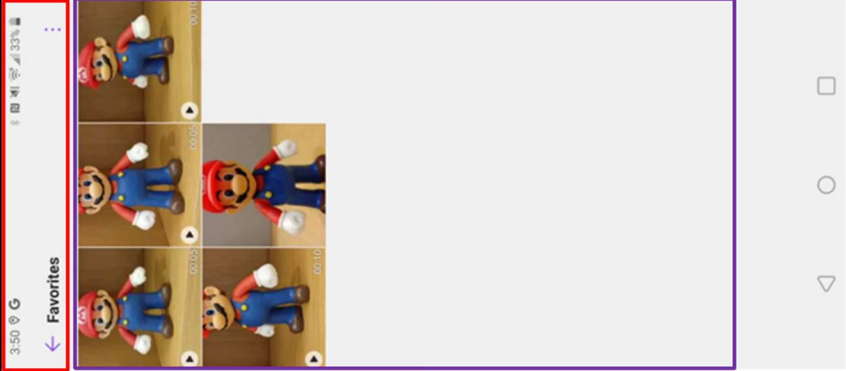
US Patent No. 10,199,072	Accused Products
	a second character corresponding to the second group of video data in the first area when the second group of thumbnails is displayed. <u>Doctrine of Equivalents</u> To the extent LG Electronics argues that this limitation is not literally met in each of the 072 Accused Products, Maxell asserts that this limitation is met under the doctrine of equivalents because the identified structure matches the function, way, and result of the claimed element and, to the extent there is a difference, the difference is insubstantial. The accused products each provide a process for performing the function of controlling to display, which is the same function performed by this claim limitation. Each 072 Accused Product performs this function the same way as the claim limitation, by using controller. Each 072 Accused Product achieves the same result as the claim limitation, of displaying a second character corresponding to the second group of video data in the first area when the second group of thumbnails is displayed.
[14.pre] The information processing method according to claim 13, further comprising:	To the extent the preamble is construed as a limitation, the LG V60 ThinQ 5G implements an information processing method according to claim 13. <i>See supra</i> Claim 13.
[14.a] controlling, by the controller, to display the first group of thumbnails in a second area when the first group of thumbnails is displayed, the second area being different from the first area; and	The LG V60 ThinQ 5G implements an information processing method comprising a controlling, by the controller, to display the first group of thumbnails in a second area when the first group of thumbnails is displayed, the second area being different from the first area. For example, the LG V60 ThinQ 5G is configured to implement a method comprising controlling, by the controller (e.g., CPU, processor or chipset), to display (via a touch screen) the first group of thumbnails in a second area when the first group of thumbnails is displayed, the second area being different from the first area.

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TO 072 ACCUSED PRODUCTS

US Patent No. 10,199,072	Accused Products						
	<table><tr><td>PLATFORM</td><td>OS Chipset CPU GPU</td><td>Android 10, upgradable to Android 13 Qualcomm SM8250 Snapdragon 865 5G (7 nm+) Octa-core (1x2.84 GHz Cortex-A77 & 3x2.42 GHz Cortex-A77 & 4x1.80 GHz Cortex-A55) Adreno 650</td></tr><tr><td>MEMORY</td><td>Card slot Internal</td><td>microSDXC (uses shared SIM slot) - dual-SIM model 128GB 8GB RAM, 256GB 8GB RAM UFS 2.1</td></tr></table> https://www.gsmarena.com/lg_v60_thinq_5g-10103.php	PLATFORM	OS Chipset CPU GPU	Android 10, upgradable to Android 13 Qualcomm SM8250 Snapdragon 865 5G (7 nm+) Octa-core (1x2.84 GHz Cortex-A77 & 3x2.42 GHz Cortex-A77 & 4x1.80 GHz Cortex-A55) Adreno 650	MEMORY	Card slot Internal	microSDXC (uses shared SIM slot) - dual-SIM model 128GB 8GB RAM, 256GB 8GB RAM UFS 2.1
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	Parts overview The diagram illustrates the components of the LG V60 ThinQ 5G smartphone. The front view (top) shows the earpiece, microphone, proximity/ambient light sensor, front camera lens, volume keys (+/-), Google Assistant key, power/lock key, touch screen (highlighted with a blue box), fingerprint sensor, and stereo headset jack. The back view (bottom) shows the microphone, SIM/memory card tray, ToF sensors, flash, rear camera lenses, wireless charging antenna area, NFC/LG Pay touchpoint, and speaker. A note at the bottom right states: 'Press and hold the volume down key and Power/Lock key at the same time for a second to take a screenshot.' LG V60 ThinQ 5G User Guide at 26.

APPENDIX 9: INFRINGEMENT CONTENTIONS APPLYING CLAIMS 11, 12, 13, 14, 15 OF U.S. PATENT NO. 10,199,072
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	 First character in first area First group of thumbnails in second area The above identification of infringing processes is representative; each of the 072 Accused Products performs this limitation in substantially the same way, using a method that differs in ways that are immaterial to the limitation. See Appendix 10 identifying for each of the remaining 072 Accused Products, including processors, camera, memory storage and display that has a controller to display the

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	first group of thumbnails in a second area when the first group of thumbnails is displayed, the second area being different from the first area. <u>Doctrine of Equivalents</u> To the extent LG Electronics argues that this limitation is not literally met in each of the 072 Accused Products, Maxell asserts that this limitation is met under the doctrine of equivalents because the identified structure matches the function, way, and result of the claimed element and, to the extent there is a difference, the difference is insubstantial. The accused products each provide a process for performing the function of controlling to display, which is the same function performed by this claim limitation. Each 072 Accused Product performs this function the same way as the claim limitation, by using controller. Each 072 Accused Product achieves the same result as the claim limitation, of displaying the first group of thumbnails in a second area when the first group of thumbnails is displayed, the second area being different from the first area. The LG V60 ThinQ 5G implements an information processing method comprising a controlling, by the controller, to display the second group of thumbnails in the second area when the second group of thumbnails is displayed. For example, the LG V60 ThinQ 5G is configured to implement a method comprising controlling, by the controller (e.g., CPU, processor or chipset), to display (via a touch screen) the second group of thumbnails in a second area when the second group of thumbnails is displayed. <table><tr><td rowspan="4">PLATFORM</td><td>OS</td><td>Android 10, upgradable to Android 13</td></tr><tr><td>Chipset</td><td>Qualcomm SM8250 Snapdragon 865 5G (7 nm+)</td></tr><tr><td>CPU</td><td>Octa-core (1x2.84 GHz Cortex-A77 & 3x2.42 GHz Cortex-A77 & 4x1.80 GHz Cortex-A55)</td></tr><tr><td>GPU</td><td>Adreno 650</td></tr><tr><td rowspan="3">MEMORY</td><td>Card slot</td><td>microSDXC (uses shared SIM slot) - dual-SIM model</td></tr><tr><td>Internal</td><td>128GB 8GB RAM, 256GB 8GB RAM</td></tr><tr><td></td><td>UFS 2.1</td></tr></table> https://www.gsmaarena.com/lg_v60_thinq_5g-10103.php	PLATFORM	OS	Android 10, upgradable to Android 13	Chipset	Qualcomm SM8250 Snapdragon 865 5G (7 nm+)	CPU	Octa-core (1x2.84 GHz Cortex-A77 & 3x2.42 GHz Cortex-A77 & 4x1.80 GHz Cortex-A55)	GPU	Adreno 650	MEMORY	Card slot	microSDXC (uses shared SIM slot) - dual-SIM model	Internal	128GB 8GB RAM, 256GB 8GB RAM		UFS 2.1
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		UFS 2.1															
[14.b] controlling, by the controller, to display the second group of thumbnails in the second area when the second group of thumbnails is displayed.																	

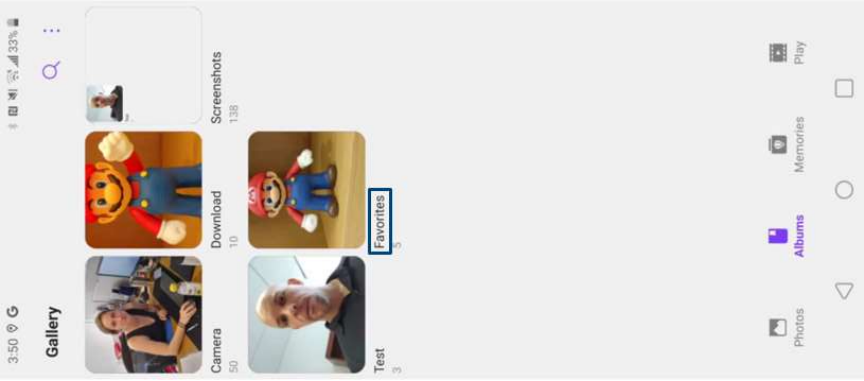
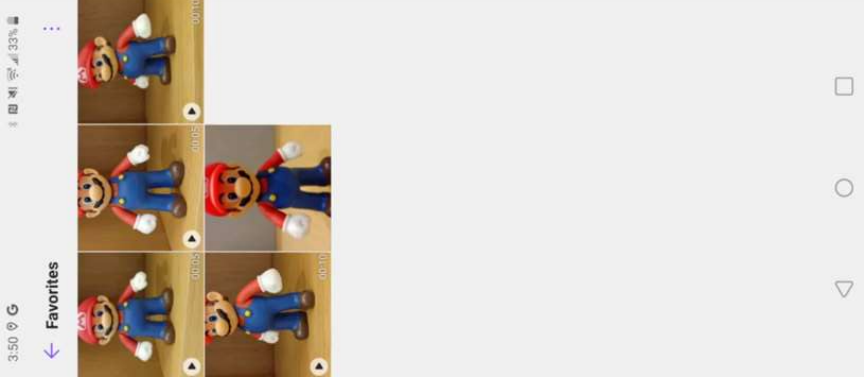
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TO 072 ACCUSED PRODUCTS**

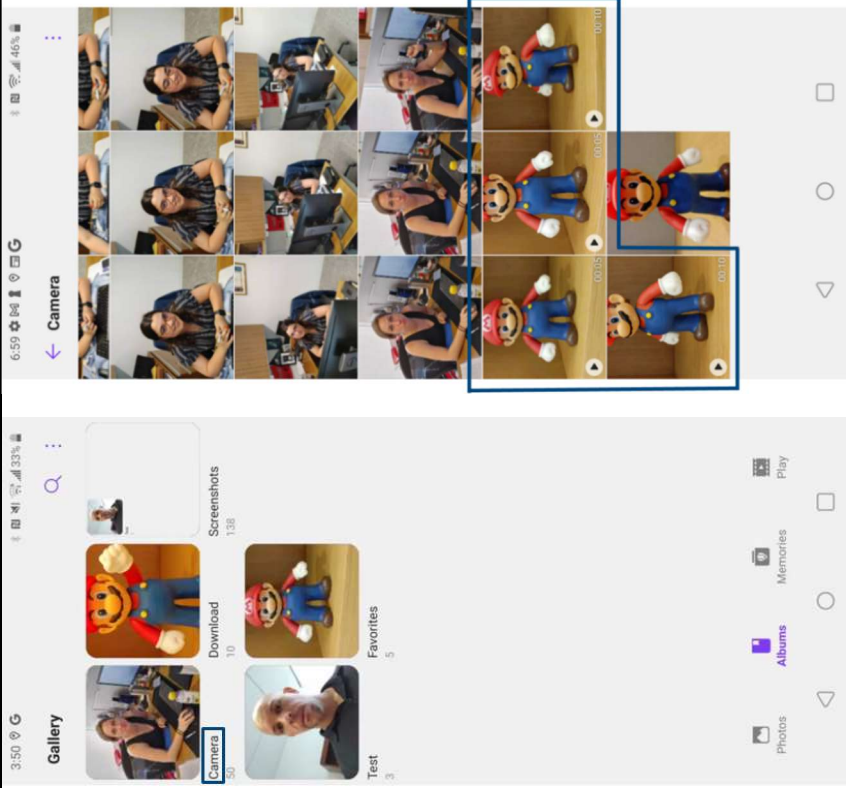
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US Patent No. 10,199,072	Accused Products
<u>Doctrine of Equivalents</u> To the extent LG Electronics argues that this limitation is not literally met in each of the 072 Accused Products, Maxell asserts that this limitation is met under the doctrine of equivalents because the identified structure matches the function, way, and result of the claimed element and, to the extent there is a difference, the difference is insubstantial. The accused products each provide a process for performing the function of controlling to display, which is the same function performed by this claim limitation. Each 072 Accused Product performs this function the same way as the claim limitation, by using a controller. Each 072 Accused Product achieves the same result as the claim limitation, by displaying the second group of thumbnails in the second area when the second group of thumbnails is displayed.	<u>Doctrine of Equivalents</u> The LG V60 ThinQ 5G implements the information processing method according to claim 11, wherein, when the one video data is deleted from the first group of video data, the controller removes the one video data from the first group of video data without deleting the one video data recorded on the recording medium. <i>See supra</i> Claim 14. As shown below, the LG V60 ThinQ 5G is configured to include a first group of video data (e.g., the video data within the “Favorites” album) and a second group of video data (e.g., the video data within the “Camera” album). <i>First Group of Video Data</i>
[15] The information processing method according to claim 14, wherein, when the one video data is deleted from the first group of video data, the controller removes the one video data from the first group of video data without deleting the one video data recorded on the recording medium.	

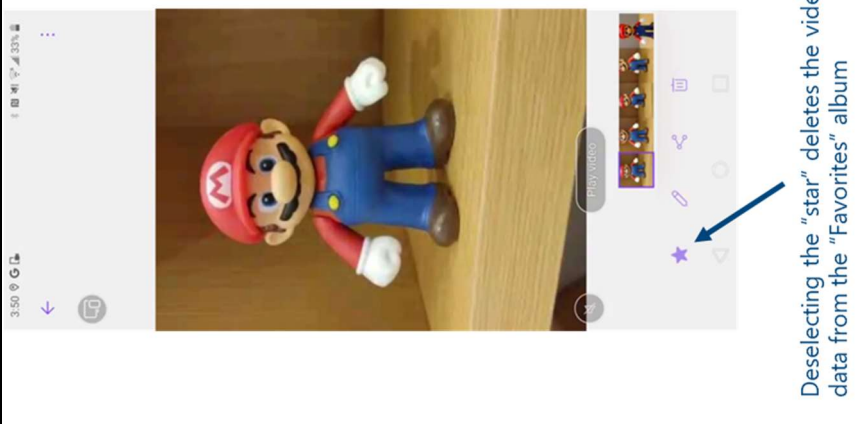
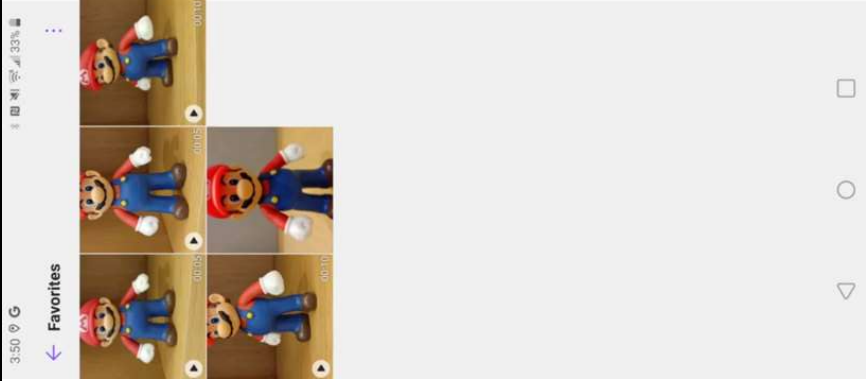
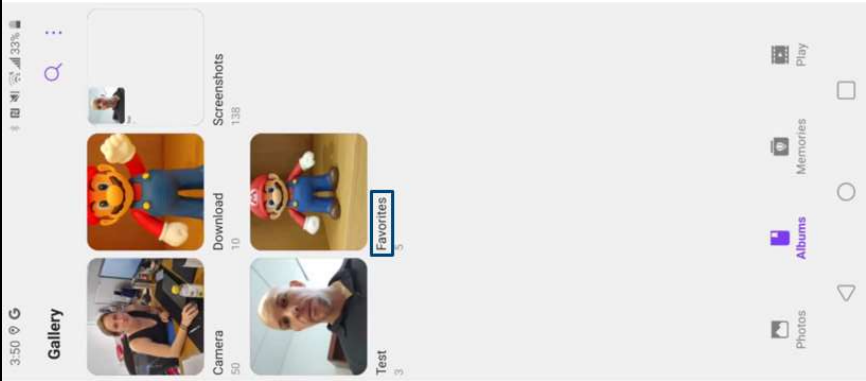
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US Patent No. 10,199,072	Accused Products
	  <i>Second Group of Video Data</i>

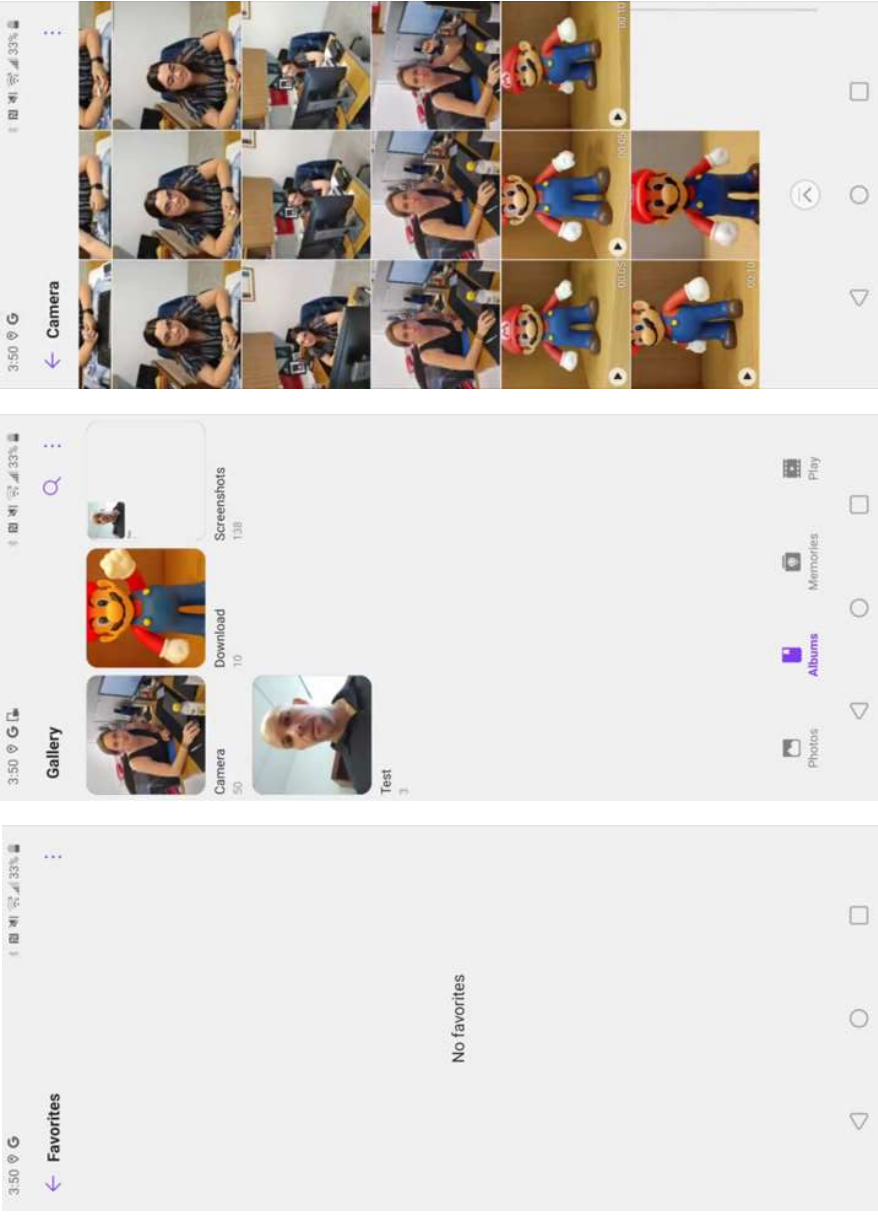
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	 When the one video data is deleted from the first group of video data, the controller removes the one video data from the first group of video data, as shown below. <i>Steps of Deleting the First Group of Video Data</i>

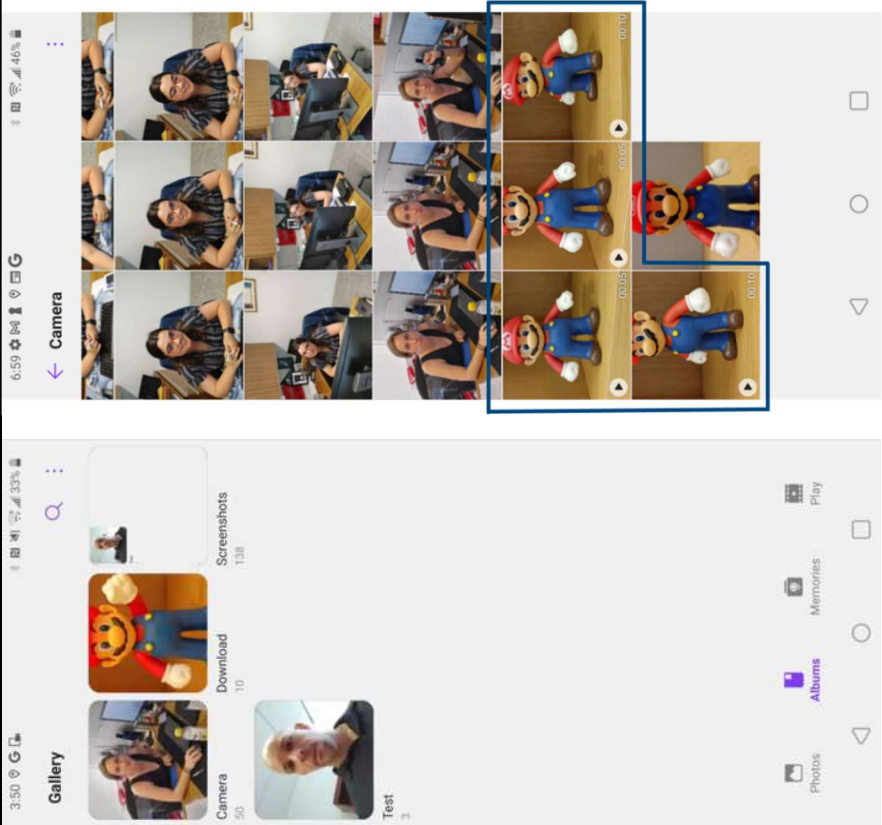
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	 Deselecting the "star" deletes the video data from the "Favorites" album

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	 However, the deletion of the first group of video data does not delete the one video data recorded on the recording medium, as shown below in the “Camera” album.

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	the one video data from the first group of video data without deleting the one video data recorded on the recording medium when the one video data is deleted from the first group of video data. . <u>Doctrine of Equivalents</u> To the extent LG Electronics argues that this limitation is not literally met in each of the 072 Accused Products, Maxell asserts that this limitation is met under the doctrine of equivalents because the identified structure matches the function, way, and result of the claimed element and, to the extent there is a difference, the difference is insubstantial. The accused products each provide a process for performing the function of removing one video data, which is the same function performed by this claim limitation. Each 072 Accused Product performs this function the same way as the claim limitation, by using a controller. Each 072 Accused Product achieves the same result as the claim limitation, by removing the one video data from the first group of video data without deleting the one video data recorded on the recording medium when the one video data is deleted from the first group of video data.