

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

LONGITUDE LICENSING LIMITED and
138 EAST LCD ADVANCEMENTS
LIMITED,

Plaintiffs,

v.

BOE TECHNOLOGY GROUP CO., LTD.,
HISENSE GROUP HOLDINGS CO., LTD.,
and HISENSE VISUAL TECHNOLOGY CO.,
LTD.

Defendants.

Case No. 2:25-cv-00440-JRG-RSP
(Lead Case)

Case No. 2:25-cv-00358-JRG-RSP
(Member Case)

JURY TRIAL DEMANDED

**HISENSE GROUP HOLDINGS CO., LTD., AND HISENSE VISUAL TECHNOLOGY CO.,
LTD. ANSWER TO
PLAINTIFFS' COMPLAINT FOR PATENT INFRINGEMENT**

Defendants Hisense Group Holdings Co., Ltd., and Hisense Visual Technology Co., Ltd. (“Hisense”) submits this Answer, Affirmative Defenses, and Counterclaims to Plaintiffs Longitude Licensing Limited’s (“Longitude”) and 138 East LCD Advancements Limited’s (“138 East”) (Longitude and 138 collectively, “Plaintiffs”) Complaint, in like-numbered paragraphs. The headings and subheadings in this Answer are used solely for purposes of convenience and organization to mirror those appearing in the Complaint. To the extent not specifically admitted herein, the allegations of Plaintiffs’ Complaint are denied.

INTRODUCTION

1. Paragraph 1 of the Complaint contains conclusions of law to which no response is required. To the extent a response is required, Hisense admits that the Complaint purports to state an action for infringement of U.S. Patent Nos. 7,636,146 (“the ’146 patent”), 8,319,512 (“the ’512

patent”), and 8,391,020 (“the ’020 patent”) (collectively, the “Longitude Patents”). Hisense denies that it has infringed or is infringing any claim of the Longitude Patents. Hisense denies the remaining allegations in Paragraph 1 of the Complaint.

2. Paragraph 2 of the Complaint contains conclusions of law to which no response is required. To the extent a response is required, Hisense admits that the Longitude Patents purport to relate to liquid crystal display (“LCD”) technologies. Hisense denies the remaining allegations in Paragraph 2 of the Complaint.

3. Hisense is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 3 of the Complaint.

4. Hisense denies the allegations in Paragraph 4 of the Complaint.

5. Hisense admits that the Complaint purports to seek damages and other relief. Hisense denies the remaining allegations in Paragraph 5 of the Complaint and denies that Plaintiffs are entitled to any of the relief that they seek.

PARTIES

6. Hisense is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 6 of the Complaint.

7. Hisense is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 7 of the Complaint.

8. Hisense is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 8 of the Complaint.

9. Hisense admits Hisense Group Holdings Co., Ltd. (“Hisense Group”), f/k/a Qingdao Hisense Electronics Industry Holdings Co., Ltd., is a company organized and existing under the laws of the P.R. China, having a principal place of business at Hisense Tower, 17 Donghai Xi Road, Qingdao, 266071.

10. Hisense admits Hisense Visual Technology Co., Ltd. (“Hisense Visual”), f/k/a Qingdao Hisense Electronics Co., Ltd., is a company organized and existing under the laws of the P.R. China, having a principal place of business at Hisense Tower, 17 Donghai Xi Road, Qingdao, 266071, China. Hisense denies any remaining allegations in Paragraph 10.

JURISDICTION AND VENUE

11. Paragraph 11 of the Complaint contains conclusions of law to which no response is required. To the extent a response is required, Hisense does not contest that this Court has subject matter jurisdiction over the present action pursuant to 28 U.S.C. §§ 1331 and 1338(a) in this matter.

12. Paragraph 12 of the Complaint contains conclusions of law to which no response is required. To the extent a response is required, Hisense denies that venue is proper or convenient in this District for this matter. Hisense denies the remaining allegations of Paragraph 12 of the Complaint.

I. BOE

13. Hisense is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 13 of the Complaint.

14. Hisense is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 14 of the Complaint.

15. Hisense is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 15 of the Complaint.

16. Hisense is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 16 of the Complaint.

II. Hisense

17. Paragraph 17 of the Complaint contains conclusions of law to which no response is required. To the extent a response is required, Hisense denies the court has general or specific personal

jurisdiction over Hisense. Hisense denies the remaining allegations of Paragraph 17 of the Complaint.

18. Hisense denies the allegations in Paragraph 18 of the Complaint.

19. Hisense denies the allegations in Paragraph 19 of the Complaint.

20. Hisense denies the allegations in Paragraph 20 of the Complaint.

21. Paragraph 21 of the Complaint contains conclusions of law to which no response is required. To the extent a response is required, Hisense denies the allegations in Paragraph 21 of the Complaint.

FACTUAL BACKGROUND

I. The Longitude Patents

22. Hisense is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in Paragraph 22 of the Complaint and therefore denies them.

23. Paragraph 23 of the Complaint contains conclusions of law to which no response is required. To the extent a response is required, Hisense admits the face of the '146 patent lists the title "Electro-Optical Panel, System with Terminals Having Different Corresponding Characteristics," and bears a filing date of August 6, 2004, and an issue date of December 22, 2009. Hisense further admits that the face of the '146 patent identifies Shin Fujita as the sole named inventor and purports to claim priority to foreign Japanese Patent Application Nos. 2003-290650 and 2004-193515. Hisense denies the remaining allegations of Paragraph 23 of the Complaint.

24. Paragraph 24 of the Complaint contains conclusions of law to which no response is required. To the extent a response is required, Hisense admits the face of the '512 patent lists the title "Flexible Substrate Including Inspection Electrode for Outputting Signal Processed in Integrated Circuit, Electro-Optical Device, and Electronic Device," and bears a filing date of March 12, 2010, and an issue date of November 27, 2012. Hisense further admits that the face of the '512 patent identifies Katsutosi Ueno as the sole named inventor and purports to claim priority to foreign Japanese

Patent Application No. 2009-069825. Hisense denies the remaining allegations of Paragraph 24 of the Complaint.

25. Paragraph 24 of the Complaint contains conclusions of law to which no response is required. To the extent a response is required, Hisense admits the face of the '020 patent lists the title "Electro-Optical Device, Electro-Optical Panel, and Electronic Apparatus," and bears a filing date of December 1, 2010, and an issue date of March 5, 2013. Hisense further admits that the face of the '020 patent identifies Munchide Saimen as the sole named inventor and purports to claim priority to foreign Japanese Patent Application Nos. 2009-275218 and 2010-214838. Hisense denies the remaining allegations of Paragraph 25 of the Complaint.

26. Hisense denies the allegations of Paragraph 26 of the Complaint.

27. Hisense denies the allegations of Paragraph 27 of the Complaint.

28. Hisense denies the allegations of Paragraph 28 of the Complaint.

II. The Inventors

29. Hisense is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 29 of the Complaint.

III. BOE

30. Hisense is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 30 of the Complaint.

31. Hisense is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 31 of the Complaint.

32. Hisense is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 32 of the Complaint.

33. Hisense is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 33 of the Complaint.

34. Hisense is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 34 of the Complaint.

35. Hisense is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 35 of the Complaint.

IV. Hisense

36. Hisense admits it manufactures and distributes electronic display products. Hisense denies the remaining allegations of Paragraph 36 of the Complaint.

37. Hisense admits news article cited speak for themselves. Hisense denies the remaining allegations of Paragraph 37 of the Complaint.

38. Hisense admits its “corporate filings” speak for themselves. Hisense denies the remaining allegations of Paragraph 38 of the Complaint.

39. Hisense admits financial statements speak for themselves. Hisense denies the remaining allegations of Paragraph 39 of the Complaint.

40. Hisense denies the allegations of Paragraph 40 of the Complaint

V. BOE’s Direct Infringement and Accused Instrumentalities

41. Hisense is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 41 of the Complaint.

42. Hisense is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 42 of the Complaint.

43. Hisense is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 43 of the Complaint.

44. Hisense is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 44 of the Complaint.

VI. Hisense's Direct Infringement and Accused Instrumentalities

45. Hisense denies the allegations of Paragraph 45 of the Complaint.

46. Hisense denies the allegations of Paragraph 46 of the Complaint.

47. Hisense denies the allegations of Paragraph 47 of the Complaint.

VII. Plaintiffs Provided Actual Notice of Infringement to BOE

48. Hisense is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 48 of the Complaint.

49. Hisense is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 49 of the Complaint.

50. Hisense is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 50 of the Complaint.

51. Hisense is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 51 of the Complaint.

52. Hisense is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 52 of the Complaint.

53. Hisense is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 53 of the Complaint.

54. Hisense is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 54 of the Complaint.

55. Hisense is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 55 of the Complaint.

56. Hisense is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 56 of the Complaint.

VIII. BOE's Indirect Infringement

57. Hisense is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 57 of the Complaint.

58. Hisense is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 58 of the Complaint.

59. Hisense is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 59 of the Complaint.

60. Hisense is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 60 of the Complaint.

61. Hisense is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 61 of the Complaint.

62. Hisense is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 62 of the Complaint.

63. Hisense is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 63 of the Complaint.

IX. Hisense's Indirect Infringement

64. Paragraph 64 of the Complaint contains conclusions of law to which no response is required. To the extent a response is required, Hisense denies all remaining allegations of Paragraph 64 of the Complaint.

65. Hisense denies the allegations of Paragraph 65 of the Complaint.

66. Hisense denies the allegations of Paragraph 66 of the Complaint.

67. Hisense denies the allegations of Paragraph 67 of the Complaint.

68. Hisense denies the allegations of Paragraph 68 of the Complaint.

COUNT I: INFRINGEMENT OF U.S. PATENT NO. 7,636,146

69. Paragraph 69 of the Complaint contains a statement of law to which no response is required. To the extent a response is required, Hisense admits that 35 U.S.C. § 282 speaks for itself.

70. Hisense denies the allegations of Paragraph 70 of the Complaint.

71. Hisense denies the allegations of Paragraph 71 of the Complaint

72. Paragraph 72 contains an introductory statement to which no response is required. To the extent a response is required, Hisense denies the allegations in Paragraph 72 of the Complaint.

73. Hisense denies the allegations of Paragraph 73 of the Complaint.

74. Hisense admits that the panel appearing in Paragraph 74 of the Complaint appears to contain the BOE and Hisense logos. To the extent a response is required, Hisense denies the allegations of Paragraph 74 of the Complaint.

75. Paragraph 75 of the Complaint uses terminology that may be the subject of claim construction by the Court and, accordingly, presents a legal conclusion to which no response is required. To the extent a response is required, Hisense denies the allegations of Paragraph 75 of the Complaint.

76. Paragraph 76 of the Complaint uses terminology that may be the subject of claim construction by the Court and, accordingly, presents a legal conclusion to which no response is required. To the extent a response is required, Hisense denies the remaining allegations of Paragraph 76 of the Complaint.

77. Paragraph 77 of the Complaint uses terminology that may be the subject of claim construction by the Court and, accordingly, presents a legal conclusion to which no response is required. To the extent a response is required, Hisense denies the remaining allegations of Paragraph 77 of the Complaint.

78. Paragraph 78 of the Complaint uses terminology that may be the subject of claim construction by the Court and, accordingly, presents a legal conclusion to which no response is required. To the extent a response is required, Hisense denies the remaining allegations of Paragraph 78 of the Complaint.

79. Paragraph 79 of the Complaint uses terminology that may be the subject of claim construction by the Court and, accordingly, presents a legal conclusion to which no response is required. To the extent a response is required, Hisense denies the remaining allegations of Paragraph 79 of the Complaint.

80. Paragraph 80 of the Complaint uses terminology that may be the subject of claim construction by the Court and, accordingly, presents a legal conclusion to which no response is required. To the extent a response is required, Hisense denies the remaining allegations of Paragraph 80 of the Complaint.

81. Paragraph 81 of the Complaint uses terminology that may be the subject of claim construction by the Court and, accordingly, presents a legal conclusion to which no response is required. To the extent a response is required, Hisense denies the remaining allegations of Paragraph 81 of the Complaint.

82. Paragraph 82 of the Complaint uses terminology that may be the subject of claim construction by the Court and, accordingly, presents a legal conclusion to which no response is required. To the extent a response is required, Hisense denies the remaining allegations of Paragraph 82 of the Complaint.

83. Paragraph 83 of the Complaint uses terminology that may be the subject of claim construction by the Court and, accordingly, presents a legal conclusion to which no response is required. To the extent a response is required, Hisense denies the remaining allegations of Paragraph 83 of the Complaint.

84. Paragraph 84 of the Complaint uses terminology that may be the subject of claim construction by the Court and, accordingly, presents a legal conclusion to which no response is required. To the extent a response is required, Hisense denies the remaining allegations of Paragraph 84 of the Complaint.

85. Paragraph 85 of the Complaint uses terminology that may be the subject of claim construction by the Court and, accordingly, presents a legal conclusion to which no response is required. To the extent a response is required, Hisense denies the remaining allegations of Paragraph 85 of the Complaint.

86. Paragraph 86 of the Complaint uses terminology that may be the subject of claim construction by the Court and, accordingly, presents a legal conclusion to which no response is required. To the extent a response is required, Hisense denies the remaining allegations of Paragraph 86 of the Complaint.

87. Paragraph 87 of the Complaint uses terminology that may be the subject of claim construction by the Court and, accordingly, presents a legal conclusion to which no response is required. To the extent a response is required, Hisense denies the remaining allegations of Paragraph 87 of the Complaint.

88. Paragraph 88 of the Complaint uses terminology that may be the subject of claim construction by the Court and, accordingly, presents a legal conclusion to which no response is required. To the extent a response is required, Hisense denies the remaining allegations of Paragraph 88 of the Complaint.

89. Hisense denies the allegations of Paragraph 89 of the Complaint.

90. Hisense is without knowledge or information sufficient to form a belief as to the truth of the allegations regarding third parties in Paragraph 90 of the Complaint. Hisense denies the remaining allegations of Paragraph 90 of the Complaint.

91. Hisense denies the allegations of Paragraph 91 of the Complaint.

92. Hisense denies the allegations of Paragraph 92 of the Complaint as stated.

93. Hisense is without knowledge or information sufficient to form a belief as to the truth of the allegations regarding third parties in Paragraph 93 of the Complaint. Hisense denies the remaining allegations of Paragraph 93 of the Complaint.

94. Hisense denies the allegations of Paragraph 94 of the Complaint as stated.

95. Hisense is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 95 of the Complaint.

96. Hisense denies the allegations of Paragraph 96 of the Complaint.

97. Hisense denies the allegations of Paragraph 97 of the Complaint as stated.

98. Hisense denies the allegations of Paragraph 98 of the Complaint.

99. Hisense denies the allegations of Paragraph 99 of the Complaint as to Hisense's alleged conduct. Hisense is without knowledge or information sufficient to form a belief as to the truth of the allegations regarding BOE in Paragraph 99.

100. Hisense denies the allegations of Paragraph 100 of the Complaint.

COUNT II: INFRINGEMENT OF U.S. PATENT NO. 8,319,512

101. Paragraph 101 of the Complaint contains a statement of law to which no response is required. To the extent a response is required, Hisense admits that 35 U.S.C. § 282 speaks for itself.

102. Hisense denies the allegations of Paragraph 102 of the Complaint.

103. Hisense denies the allegations of Paragraph 103 of the Complaint

104. Paragraph 104 contains an introductory statement to which no response is required. To the extent a response is required, Hisense denies the allegations in Paragraph 104 of the Complaint.

105. Hisense denies the allegations of Paragraph 105 of the Complaint.

106. Hisense admits that the panel appearing in Paragraph 106 of the Complaint appears to

contain the BOE and Hisense logos. To the extent a response is required, Hisense denies the allegations of Paragraph 106 of the Complaint.

107. Paragraph 107 of the Complaint uses terminology that may be the subject of claim construction by the Court and, accordingly, presents a legal conclusion to which no response is required. To the extent a response is required, Hisense denies the allegations of Paragraph 107 of the Complaint.

108. Paragraph 108 of the Complaint uses terminology that may be the subject of claim construction by the Court and, accordingly, presents a legal conclusion to which no response is required. To the extent a response is required, Hisense denies the remaining allegations of Paragraph 108 of the Complaint.

109. Paragraph 109 of the Complaint uses terminology that may be the subject of claim construction by the Court and, accordingly, presents a legal conclusion to which no response is required. To the extent a response is required, Hisense denies the remaining allegations of Paragraph 109 of the Complaint.

110. Paragraph 110 of the Complaint uses terminology that may be the subject of claim construction by the Court and, accordingly, presents a legal conclusion to which no response is required. To the extent a response is required, Hisense denies the remaining allegations of Paragraph 110 of the Complaint.

111. Paragraph 111 of the Complaint uses terminology that may be the subject of claim construction by the Court and, accordingly, presents a legal conclusion to which no response is required. To the extent a response is required, Hisense denies the remaining allegations of Paragraph 111 of the Complaint.

112. Paragraph 112 of the Complaint uses terminology that may be the subject of claim construction by the Court and, accordingly, presents a legal conclusion to which no response is

required. To the extent a response is required, Hisense denies the remaining allegations of Paragraph 112 of the Complaint.

113. Paragraph 113 of the Complaint uses terminology that may be the subject of claim construction by the Court and, accordingly, presents a legal conclusion to which no response is required. To the extent a response is required, Hisense denies the remaining allegations of Paragraph 113 of the Complaint.

114. Paragraph 114 of the Complaint uses terminology that may be the subject of claim construction by the Court and, accordingly, presents a legal conclusion to which no response is required. To the extent a response is required, Hisense denies the remaining allegations of Paragraph 114 of the Complaint.

115. Paragraph 115 of the Complaint uses terminology that may be the subject of claim construction by the Court and, accordingly, presents a legal conclusion to which no response is required. To the extent a response is required, Hisense denies the remaining allegations of Paragraph 115 of the Complaint.

116. Paragraph 116 of the Complaint uses terminology that may be the subject of claim construction by the Court and, accordingly, presents a legal conclusion to which no response is required. To the extent a response is required, Hisense denies the remaining allegations of Paragraph 116 of the Complaint.

117. Paragraph 117 of the Complaint uses terminology that may be the subject of claim construction by the Court and, accordingly, presents a legal conclusion to which no response is required. To the extent a response is required, Hisense denies the remaining allegations of Paragraph 117 of the Complaint.

118. Paragraph 118 of the Complaint uses terminology that may be the subject of claim construction by the Court and, accordingly, presents a legal conclusion to which no response is

required. To the extent a response is required, Hisense denies the remaining allegations of Paragraph 118 of the Complaint.

119. Paragraph 119 of the Complaint uses terminology that may be the subject of claim construction by the Court and, accordingly, presents a legal conclusion to which no response is required. To the extent a response is required, Hisense denies the remaining allegations of Paragraph 119 of the Complaint.

120. Paragraph 120 of the Complaint uses terminology that may be the subject of claim construction by the Court and, accordingly, presents a legal conclusion to which no response is required. To the extent a response is required, Hisense denies the remaining allegations of Paragraph 120 of the Complaint.

121. Hisense denies the allegations of Paragraph 121 of the Complaint.

122. Hisense is without knowledge or information sufficient to form a belief as to the truth of the allegations regarding third parties in Paragraph 122 of the Complaint. Hisense denies the remaining allegations of Paragraph 122 of the Complaint.

123. Hisense denies the allegations of Paragraph 123 of the Complaint.

124. Hisense denies the allegations of Paragraph 124 of the Complaint as stated.

125. Hisense is without knowledge or information sufficient to form a belief as to the truth of the allegations regarding third parties in Paragraph 125 of the Complaint. Hisense denies the remaining allegations of Paragraph 125 of the Complaint.

126. Hisense denies the allegations of Paragraph 126 of the Complaint as stated.

127. Hisense is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 127 of the Complaint.

128. Hisense denies the allegations of Paragraph 128 of the Complaint.

129. Hisense denies the allegations of Paragraph 129 of the Complaint as stated.

130. Hisense denies the allegations of Paragraph 130 of the Complaint.

131. Hisense denies the allegations of Paragraph 131 of the Complaint as to Hisense's alleged conduct. Hisense is without knowledge or information sufficient to form a belief as to the truth of the allegations regarding BOE in Paragraph 131.

132. Hisense denies the allegations of Paragraph 132 of the Complaint.

COUNT III: INFRINGEMENT OF U.S. PATENT NO. 8,391,020

133. Paragraph 101331 of the Complaint contains a statement of law to which no response is required. To the extent a response is required, Hisense admits that 35 U.S.C. § 282 speaks for itself.

134. Hisense denies the allegations of Paragraph 134 of the Complaint.

135. Hisense denies the allegations of Paragraph 135 of the Complaint

136. Paragraph 136 contains an introductory statement to which no response is required. To the extent a response is required, Hisense denies the allegations in Paragraph 136 of the Complaint.

137. Hisense denies the allegations of Paragraph 137 of the Complaint.

138. Hisense admits that the panel appearing in Paragraph 138 of the Complaint appears to contain the BOE and Hisense logos. To the extent a response is required, Hisense denies the allegations of Paragraph 138 of the Complaint.

139. Paragraph 139 of the Complaint uses terminology that may be the subject of claim construction by the Court and, accordingly, presents a legal conclusion to which no response is required. To the extent a response is required, Hisense denies the allegations of Paragraph 139 of the Complaint.

140. Paragraph 140 of the Complaint uses terminology that may be the subject of claim construction by the Court and, accordingly, presents a legal conclusion to which no response is required. To the extent a response is required, Hisense denies the remaining allegations of Paragraph 140 of the Complaint.

141. Paragraph 141 of the Complaint uses terminology that may be the subject of claim construction by the Court and, accordingly, presents a legal conclusion to which no response is required. To the extent a response is required, Hisense denies the remaining allegations of Paragraph 141 of the Complaint.

142. Paragraph 142 of the Complaint uses terminology that may be the subject of claim construction by the Court and, accordingly, presents a legal conclusion to which no response is required. To the extent a response is required, Hisense denies the remaining allegations of Paragraph 142 of the Complaint.

143. Paragraph 143 of the Complaint uses terminology that may be the subject of claim construction by the Court and, accordingly, presents a legal conclusion to which no response is required. To the extent a response is required, Hisense denies the remaining allegations of Paragraph 143 of the Complaint.

144. Paragraph 144 of the Complaint uses terminology that may be the subject of claim construction by the Court and, accordingly, presents a legal conclusion to which no response is required. To the extent a response is required, Hisense denies the remaining allegations of Paragraph 144 of the Complaint.

145. Paragraph 145 of the Complaint uses terminology that may be the subject of claim construction by the Court and, accordingly, presents a legal conclusion to which no response is required. To the extent a response is required, Hisense denies the remaining allegations of Paragraph 145 of the Complaint.

146. Paragraph 146 of the Complaint uses terminology that may be the subject of claim construction by the Court and, accordingly, presents a legal conclusion to which no response is required. To the extent a response is required, Hisense denies the remaining allegations of Paragraph 146 of the Complaint.

147. Paragraph 147 of the Complaint uses terminology that may be the subject of claim construction by the Court and, accordingly, presents a legal conclusion to which no response is required. To the extent a response is required, Hisense denies the remaining allegations of Paragraph 147 of the Complaint.

148. Paragraph 148 of the Complaint uses terminology that may be the subject of claim construction by the Court and, accordingly, presents a legal conclusion to which no response is required. To the extent a response is required, Hisense denies the remaining allegations of Paragraph 148 of the Complaint.

149. Paragraph 149 of the Complaint uses terminology that may be the subject of claim construction by the Court and, accordingly, presents a legal conclusion to which no response is required. To the extent a response is required, Hisense denies the remaining allegations of Paragraph 149 of the Complaint.

150. Paragraph 150 of the Complaint uses terminology that may be the subject of claim construction by the Court and, accordingly, presents a legal conclusion to which no response is required. To the extent a response is required, Hisense denies the remaining allegations of Paragraph 150 of the Complaint.

151. Paragraph 151 of the Complaint uses terminology that may be the subject of claim construction by the Court and, accordingly, presents a legal conclusion to which no response is required. To the extent a response is required, Hisense denies the remaining allegations of Paragraph 151 of the Complaint.

152. Paragraph 152 of the Complaint uses terminology that may be the subject of claim construction by the Court and, accordingly, presents a legal conclusion to which no response is required. To the extent a response is required, Hisense denies the remaining allegations of Paragraph 152 of the Complaint.

153. Paragraph 153 of the Complaint uses terminology that may be the subject of claim construction by the Court and, accordingly, presents a legal conclusion to which no response is required. To the extent a response is required, Hisense denies the remaining allegations of Paragraph 153 of the Complaint.

154. Paragraph 154 of the Complaint uses terminology that may be the subject of claim construction by the Court and, accordingly, presents a legal conclusion to which no response is required. To the extent a response is required, Hisense denies the remaining allegations of Paragraph 154 of the Complaint.

155. Hisense denies the allegations of Paragraph 155 of the Complaint.

156. Hisense is without knowledge or information sufficient to form a belief as to the truth of the allegations regarding third parties in Paragraph 156 of the Complaint. Hisense denies the remaining allegations of Paragraph 156 of the Complaint.

157. Hisense denies the allegations of Paragraph 157 of the Complaint.

158. Hisense denies the allegations of Paragraph 158 of the Complaint as stated.

159. Hisense is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 159 of the Complaint Hisense denies the allegations of Paragraph 159 of the Complaint as stated.

160. Hisense denies the allegations of Paragraph 160 of the Complaint as stated.

161. Hisense is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 161 of the Complaint.

162. Hisense denies the allegations of Paragraph 162 of the Complaint.

163. Hisense is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 163 of the Complaint.

164. Hisense denies the allegations of Paragraph 164 of the Complaint as stated.

165. Hisense denies the allegations of Paragraph 165 of the Complaint.

166. Hisense denies the allegations of Paragraph 166 of the Complaint as to Hisense's alleged conduct. Hisense is without knowledge or information sufficient to form a belief as to the truth of the allegations regarding BOE in Paragraph 166.

167. Hisense denies the allegations of Paragraph 167 of the Complaint.

JURY DEMAND

168. Hisense admits that Paragraph 168 of the Complaint contains Plaintiffs' demand for a jury trial on all claims and issues so triable. Hisense denies the remainder of Paragraph 168 of the Complaint.

RESPONSES TO PRAYER FOR RELIEF

Hisense denies all remaining allegations not specifically admitted herein. Hisense denies that Plaintiffs are entitled to any judgment or relief against Hisense and specifically denies paragraphs (A) through (E) of Plaintiffs' Prayer for Relief.

GENERAL DENIAL AND NON-WAIVER

Hisense further denies each and every allegation in the Complaint that is not specifically admitted, denied or otherwise responded to in this Answer. The failure to deny a specific allegation, or assert a specific defense, shall not be deemed an admission of an allegation or a waiver of a defense.

AFFIRMATIVE AND OTHER DEFENSES

Hisense asserts the following defenses without altering the applicable burdens of proof. Hisense reserves the right to amend its currently pled defenses and/or assert additional defenses as they become apparent through discovery.

FIRST AFFIRMATIVE DEFENSE

1. Plaintiffs have failed to state a claim upon which relief may be granted because, *inter alia*, they have not alleged plausible allegations of infringement.

SECOND AFFIRMATIVE DEFENSE

2. One or more claims of the Longitude Patents are invalid for failure to comply with the requirements of Title 35, United States Code, including at least §§ 101, 102, 103, and/or 112, because the claims are directed to abstract ideas or other non-statutory subject matter, because the claims lack novelty and are taught or suggested by the prior art, and because the claims suffer from a failure of written description, lack of enablement, and claim indefiniteness.

THIRD AFFIRMATIVE DEFENSE

3. Hisense has not infringed and does not infringe any claim of the Longitude Patents under any theory of infringement.

FOURTH AFFIRMATIVE DEFENSE

4. Hisense has not willfully infringed any claim of the Longitude Patents.

FIFTH AFFIRMATIVE DEFENSE

5. Plaintiffs' claim for damages is limited by 35 U.S.C. § 286.

SIXTH AFFIRMATIVE DEFENSE

6. Plaintiffs are barred in whole or in part from recovering damages under 35 U.S.C. § 287 to the extent Plaintiffs or their licensees have failed to provide proper notice of any alleged infringement.

SEVENTH AFFIRMATIVE DEFENSE

7. Plaintiffs are barred in whole or in part from recovering their costs under 35 U.S.C. § 288.

EIGHTH AFFIRMATIVE DEFENSE

8. Plaintiffs' claims are barred by one or more of the doctrines of waiver, acquiescence, estoppel (including without limitation, equitable estoppel and prosecution history estoppel), patent misuse, and unclean hands.

NINTH AFFIRMATIVE DEFENSE

9. Plaintiffs are not entitled to injunctive relief. Among other things, Plaintiffs are not able to meet the standards for such relief as set forth in *eBay Inc. v. MercExchange, LLC*, 547 U.S. 388 (2006).

TENTH AFFIRMATIVE DEFENSE

10. To the extent Plaintiffs do not own, exclusively license and/or hold all substantial rights of the Longitude Patents, they lack standing to bring the present litigation.

ELEVENTH AFFIRMATIVE DEFENSE

11. Plaintiffs are barred in whole or in part from recovering damages under 35 U.S.C. § 271 to the extent Hisense is licensed to make, use, offer for sale, or sell the alleged inventions of the Longitude Patents.

TWELFTH AFFIRMATIVE DEFENSE

12. One or more claims of the Longitude Patents are invalid under the doctrine of obviousness-type double patenting.

RESERVATION OF AFFIRMATIVE DEFENSES

13. Hisense reserves all defenses available under the Federal Rules of Civil Procedure, the Patent Laws of the United States, and any other defenses or counterclaims that may now or in the future be available based on discovery or any other factual investigation concerning this case, including that Plaintiffs have failed to aver any facts supporting the conclusion that they have suffered any irreparable injury or harm under 35 U.S.C. § 283, and that Plaintiffs have failed to aver any facts supporting that this is an exceptional case and/or an award of attorney's fees under 35 U.S.C. § 285.

JURY DEMAND

Hisense requests a trial by jury on all issues so triable including specifically on Plaintiffs' claims and Hisense's defenses thereto.

PRAYER FOR RELIEF

WHEREFORE, Hisense respectfully requests that judgment be entered in its favor as follows:

- A. For the Complaint to be dismissed, with prejudice, and Plaintiffs' requests for relief be denied entirely.
- B. For a declaration that the claims of U.S. Patent Nos. 7,636,146; 8,319,512; and 8,391,020 are invalid, unenforceable and/or not infringed.
- C. For the Plaintiffs to be preliminarily and permanently enjoined from asserting that Hisense, or its officers, agents, representatives, stockholders, and/or customers, have infringed or are infringing any of the claims of the Longitude Patents.
- D. For Plaintiffs to be preliminarily and permanently enjoined from bringing suit against Hisense, or their officers, agents, representatives, stockholders, and/or customers, for infringement of any of the Longitude Patents.
- E. For a declaration that this case is an exceptional case under 35 U.S.C. § 285 and that Hisense be awarded its attorneys' fees, costs, and other expenses incurred in this action.
- F. For Hisense to be awarded such other and further relief as the Court may deem just and proper.

Dated: November 26, 2025

Respectfully submitted,

By: /s/ Mellisa Smith
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Counsel for Defendants

CERTIFICATE OF SERVICE

Pursuant to the Federal Rules of Civil Procedure and Local Rule CV-5, the undersigned hereby certifies that, on November 26, 2025, all counsel of record who have appeared in this case are being served with a copy of the above-referenced document via the Court's CM/ECF system.

/s/ Melissa R. Smith