

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

PANELTOUCH TECHNOLOGIES,
LLC,

Plaintiff,

v.

BOE TECHNOLOGY GROUP CO.,
LTD.,

Defendant.

Case No. 2:25-cv-245-JRG

**PLAINTIFF PANELTOUCH LLC'S PRELIMINARY DISCLOSURE
OF ASSERTED CLAIMS AND INFRINGEMENT CONTENTIONS**

I. Patent Rule 3-1: Disclosure of Asserted Claims and Infringement Contentions

Pursuant to Patent Rule 3-1, Plaintiff Paneltouch Technologies, LLC ("Plaintiff" or "Paneltouch") submits the following Preliminary Disclosure of Asserted Claims and Infringement Contentions. This disclosure is based on the information available to Plaintiff as of the date of this disclosure, and Plaintiff reserves the right to amend this disclosure to the full extent permitted, consistent with the Court's Rules and Orders.

A. Patent Rule 3-1(a): Asserted Claims

Plaintiff asserts that Defendant BOE Technology Group Co., Ltd. ("Defendant" or "BOE") infringes the following claims (collectively, "Asserted Claims"):

- (1) U.S. Patent No. 8,704,762 (the "'762 patent"), claims 1, 2, 3, 6, 7, 8, 9;
- (2) U.S. Patent No. 8,803,836 (the "'836 patent"), claim 8;
- (3) U.S. Patent No. 9,250,758 (the "'758 patent"), claims 1, 9;
- (4) U.S. Patent No. 9,507,477 (the "'477 patent"), claims 12-16, 21;
- (5) U.S. Patent No. 11,126,025 (the "'025 patent"), claims 1-5.

B. Patent Rule 3-1(b): Accused Instrumentalities of which Plaintiff is aware

Plaintiff asserts that the Asserted Claims are infringed by the various instrumentalities used, made, sold, offered for sale, or imported into the United States by Defendant, including:

- (1) For the '762, '836, '758, and '477 patents: BOE display panels with a touch input device, including without limitation the BOE panel supplied to Valve and included in the Valve Steam Deck, and all versions and variations thereof since the issuance of the asserted patent. BOE panels sold to Apple are excluded.
- (2) For the '025 patent: BOE LCD display panels with an in-cell touch panel, including without limitation the BOE panel supplied to Amazon and included in the Amazon Fire HD10 tablet, and all versions and variations thereof since the issuance of the asserted patent. BOE panels sold to Apple are excluded.

The above are collectively defined as “Accused Instrumentalities.” Defendant’s Accused Instrumentalities of which Plaintiff is presently aware are described in more detail in the accompanying preliminary infringement contention charts.

Plaintiff reserves the right to accuse additional products from Defendant to the extent Plaintiff becomes aware of additional products during the discovery process. Unless otherwise stated, Plaintiff’s assertions of infringement apply to all variations, versions, and applications of each of the Accused Instrumentalities, on information and belief, that different variations, versions, and applications of each of the Accused Instrumentalities are substantially the same for purposes of infringement of the Asserted Claims.

C. Patent Rule 3-1(c): Claim Charts

Plaintiff’s analysis of Defendant’s products is based upon limited information that is publicly available, and based on Plaintiff’s own investigation prior to any discovery in these

actions. Specifically, Plaintiff's analysis is based on certain limited resources that evidence certain products made, sold, offered for sale, used, or imported into the United States by Defendant.

Plaintiff reserves the right to amend or supplement these disclosures for any of the following reasons:

- (1) Defendant and/or third parties provide evidence relating to the Accused Instrumentalities;
- (2) Plaintiff's position on infringement of specific claims may depend on the claim constructions adopted by the Court, which has not yet occurred; and
- (3) Plaintiff's investigation and analysis of Defendant's Accused Instrumentalities is based upon public information and Plaintiff's own investigations. Plaintiff reserves the right to amend these contentions based upon discovery of non-public information that Plaintiff anticipates receiving during discovery.

Attached and incorporated herein in their entirety are charts identifying where each element of the Asserted Claims are found in the Accused Instrumentalities.

Unless otherwise indicated, the information provided that corresponds to each claim element is considered to indicate that each claim element is found within each of the different variations, versions, and applications of each of the respective Accused Instrumentalities described above.

D. Patent Rule 3-1(d): Literal Infringement / Doctrine of Equivalents

With respect to the patents at issue, each element of each Asserted Claim is considered to be literally present. Plaintiff also contends that each Asserted Claim is infringed or has been infringed under the doctrine of equivalents in Defendant's Accused Instrumentalities. Plaintiff also contends that Defendant both directly and indirectly infringes the Asserted Claims. For example, the Accused Instrumentalities are provided by the Defendant to customers, who are

actively encouraged and instructed (for example, through Defendant's online instructions on its website and instructions, manual, or user guides that are provided with the Accused Instrumentalities) by Defendant to use the Accused Instrumentalities in ways that directly infringe the Asserted Claims. Defendant therefore specifically intends for and induces its customers to infringe the Asserted Claims under Section 271(b) through the customers' normal and customary use of the Accused Instrumentalities. In addition, Defendant is contributorily infringing the Asserted Claims under Section 271(c) and/or Section 271(f) by selling, offering for sale, or importing the Accused Instrumentalities into the United States, which constitute a material part of the inventions claimed in the Asserted Claims, are especially made or adapted to infringe the Asserted Claims, and are otherwise not staple articles or commodities of commerce suitable for non-infringing use.

E. Patent Rule 3-1(e): Priority Dates

The Asserted Claims of the '762 and '477 patents are entitled to a priority date at least as early as June 2, 2010, the filing date of Japanese Patent Application No. 2010-126877.

The Asserted Claims of the '836 and '758 patents are entitled to a priority date at least as early as January 13, 2009, the filing date of Japanese Patent Application No. 2009-004874.

The Asserted Claims of the '025 patent are entitled to a priority date at least as early as February 28, 2019, the filing date of both Japanese Patent Application No. 2019-035692 and Japanese Patent Application No. 2019-035902.

A diligent search continues for additional responsive information and Plaintiff reserves the right to supplement this response.

F. Patent Rule 3-1(f): Identification of Instrumentalities Practicing the Claimed Invention

Plaintiff does not identify any of its own instrumentalities as practicing the Asserted Claims.

II. Patent Rule 3-2: Document Production Accompanying Disclosure

Pursuant to Patent Rule 3-2, Plaintiff has or shortly will serve its Document Production Accompanying Disclosure, and gives the following identification of the categories to which each of the documents corresponds.

A. Patent Rule 3-2(a) documents:

Plaintiff is presently unaware of any documents in its possession, custody, or control sufficient to evidence any discussion with, disclosure to, or other manner of providing to a third party, or sale of or offer to sell, the inventions recited in the Asserted Claims of the Asserted Patents prior to the application dates or priority dates for the Asserted Patents. A diligent search continues for such documents and Plaintiff reserves the right to supplement this response.

B. Patent Rule 3-2(b) documents:

Plaintiff is presently unaware of any documents in its possession, custody, or control related to evidencing conception and reduction to practice of each claimed invention of the Asserted Patents. A diligent search continues for additional documents and Plaintiff reserves the right to supplement this response.

C. Patent Rule 3-2(c) documents:

Plaintiff is concurrently producing the file histories for the Asserted Patents.

Dated: Nov. 10, 2025

Respectfully submitted,

/s/ Benjamin T. Wang

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***Attorneys for Plaintiff Paneltouch Technologies,
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CERTIFICATE OF SERVICE

I certify that this document is being served upon counsel of record for Defendant
on Nov. 10, 2025, via e-mail.

/s/ Christian W. Conkle
Christian W. Conkle