

**UNITED STATES INTERNATIONAL TRADE COMMISSION  
WASHINGTON, D.C.**

**In the Matter of**

**CERTAIN VIDEO-CAPABLE  
ELECTRONIC DEVICES, INCLUDING  
SMART TELEVISIONS, MONITORS,  
AND COMPONENTS THEREOF**

**Investigation No. 337-TA-\_\_\_\_\_**

**VERIFIED COMPLAINT UNDER SECTION 337  
OF THE TARIFF ACT OF 1930, AS AMENDED**

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## I. INTRODUCTION

1. This Complaint is filed by InterDigital, Inc., InterDigital VC Holdings, Inc., and InterDigital Madison Patent Holdings SAS (collectively, “InterDigital” or “Complainants”) pursuant to Section 337 of the Tariff Act of 1930, as amended, 19 U.S.C. § 1337 (“Section 337”) to remedy the unlawful and unauthorized importation, sale for importation, and/or sale within the United States after importation into the United States, of certain electronic devices, including smart televisions, monitors, and components thereof (the “Accused Products”) that directly infringe, contribute to, and/or induce the infringement of certain claims of United States Patent Nos. 8,085,846 (“the ’846 Patent”), 9,294,784 (“the ’784 Patent”), 10,250,877 (“the ’877 Patent”), 11,695,962 (“the ’962 Patent”), 11,399,168 (“the ’168 Patent”), and 9,654,751 (“the ’751 Patent”) (collectively, the “Asserted Patents”), either literally and/or under the doctrine of equivalents:

| <b>Asserted Patent</b>     | <b>Asserted Claims<br/>(Independent Claims Bolded)</b>                   |
|----------------------------|--------------------------------------------------------------------------|
| U.S. Patent No. 8,085,846  | <b>1, 4, 5, 9, 10, 11, 13, 14, 15,</b> 16, 17, 18, <b>19,</b> 20, 21, 22 |
| U.S. Patent No. 9,294,784  | <b>9, 13, 15</b>                                                         |
| U.S. Patent No. 10,250,877 | <b>1, 4, 7, 8</b>                                                        |
| U.S. Patent No. 11,695,962 | <b>1, 3, 13, 15</b>                                                      |
| U.S. Patent No. 11,399,168 | <b>18, 19, 20</b>                                                        |
| U.S. Patent No. 9,654,751  | <b>14, 15</b>                                                            |

2. The Proposed Respondents are TCL Industries Holdings Co., Ltd., TCL Technology Group Corp., TCL Electronics Holdings Limited, Shenzhen TCL New Technology Co., Ltd., TCL King Electrical Appliances (Huizhou) Company Limited, TCL Overseas Marketing Limited, TCL Smart Device (Vietnam) Company Limited, TCL Smart Screen Technology HK, TCL Moka International Limited, and TTE Technology, Inc. (collectively, “TCL”) and Hisense Co., Ltd., Hisense USA Corporation, and Hisense Electronics Manufacturing Company of America Corporation (collectively, “Hisense”) (together, “Proposed Respondents”). The Accused Products

are manufactured by or on behalf of TCL and Hisense. On information and belief, those products use AOMedia Video 1 (“AV1”) and/or High Dynamic Range (“HDR”) technology.<sup>1</sup>

3. Specifically, and in accordance with 19 C.F.R. § 210.12(a)(12), the Accused Products are smart televisions, monitors, and components and modules thereof. The components and modules include, for example, the main board and/or motherboard of the smart television or monitor. Additionally, the Domestic Industry Products include smartphones, tablets, laptops, and gaming consoles. Non-limiting examples of the Accused Products include the TCL 65-Inch Class QM7K Series Mini LED QLED 4K HDR Smart TV and Hisense 55-Inch U7 Mini LED ULED 4K UHD Smart TV, each of which infringes one or more claims of one or more Asserted Patents.

4. On information and belief, the Accused Products are manufactured and assembled outside of the United States by or on behalf of Respondents. The Accused Products are then sold for importation into the United States, imported into the United States, or sold within the United States after importation, by or on behalf of Respondents.

5. Pursuant to 19 U.S.C. § 1337(d)(1), Complainants seek a limited exclusion order against each Respondent and its subsidiaries, predecessors, affiliates, agents, successors, and assigns, barring from entry into the United States all of Respondents’ products that infringe, directly or indirectly, one or more claims of the Asserted Patents.

6. Complainants also seek cease and desist orders pursuant to 19 U.S.C. § 1337(f), prohibiting Respondents from importing, selling, offering for sale (including *via* the Internet or electronic mail) marketing, advertising (including *via* the Internet or electronic mail), distributing, transferring (except for exportation), soliciting United States agents or distributors, and aiding or abetting other entities in the importation, sale for importation, sale after importation, transfer

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<sup>1</sup> There are no F/RAND obligations or encumbrances relevant to this investigation.

(except for exportation), or distribution of, Accused Products that infringe either directly or indirectly, one or more claims of the Asserted Patents.

7. Further, Complainants request that the Commission impose a bond upon Respondents' importation of infringing Accused Products during the 60-day Presidential review period pursuant to 19 U.S.C. § 1337(j) to prevent further injury to Complainants' and their licensees' domestic industry relating to each of the Asserted Patents.

8. As required by 19 U.S.C. § 1337(a)(2) and (3), an industry in the United States relating to articles protected by the Asserted Patents exists.

## **II. THE PARTIES**

### **A. The Complainants**

9. Complainant InterDigital, Inc. is a Pennsylvania corporation with its principal place of business at 200 Bellevue Parkway, Suite 300, Wilmington, Delaware 19809.

10. Complainant InterDigital VC Holdings, Inc. is a Delaware corporation with its principal place of business at 200 Bellevue Parkway, Suite 300, Wilmington, Delaware 19809. InterDigital VC Holdings, Inc. is a wholly owned subsidiary of InterDigital, Inc. InterDigital VC Holdings, Inc. owns, by assignment, all right, title, and interest in and to the '962 and '168 Patents. InterDigital VC Holdings, Inc. is the sole owner of the '962 and '168 Patents and has owned them at all relevant times. Ex. 10 (Certified Assignment Records for '962 Patent); Ex. 11 (Non-Certified Assignment Records for '168 Patent).

11. Complainant InterDigital Madison Patent Holdings SAS is a French société par actions simplifiée (simplified joint stock company) with its principal place of business at 3 Rue du Colonel Moll, Paris, France 75017. InterDigital Madison Patent Holdings SAS is a wholly owned subsidiary of InterDigital, Inc. InterDigital Madison Patent Holdings SAS owns, by assignment, all right, title, and interest in and to the '846, '784, '877, and '751 Patents. InterDigital Madison

Patent Holdings SAS is the sole owner of the '846, '784, '877, and '751 Patents and has owned them at all relevant times. Ex. 7 (Certified Assignment Records for '846 Patent); Ex. 8 (Certified Assignment Records for '784 Patent); Ex. 9 (Certified Assignment Records for '877 Patent); Ex. 12 (Non-Certified Assignment Records for '751 Patent).

12. InterDigital is one of the most successful and innovative research and development companies of the last half century. As a dynamic and groundbreaking engineering company, for more than 50 years InterDigital has been at the forefront of developing foundational video, wireless communication, and other digital technologies.

13. InterDigital was founded by Sherwin Seligsohn in 1972 as International Mobile Machines Corporation (IMM). Led by a young innovator with a keen desire to stay connected, the company's first product line was a portable analog radio system, including a wireless handheld analog telephone capable of connecting to a public network. IMM demonstrated its wireless telephone during the bicentennial celebrations in Philadelphia's Fairmount Park, the same place that Alexander Graham Bell first demonstrated his telephone 100 years earlier. Above all else, InterDigital is an engineering company. In fact, InterDigital has developed and implemented a wide variety of wireless technologies, systems, and products, many of which form the backbone of modern-day digital wireless communication. InterDigital has helped develop and shape technologies in every aspect of the network—from handsets to base stations and mobile edge computing; from IoT sensors to streaming video and beyond.

14. Every year, InterDigital pours a massive amount of money into its worldclass research and IP portfolio development engine. For example, in the most recently reported fiscal year alone, InterDigital reinvested well over nine figures—a sum representing nearly 50% of its recurring revenues—back into this cycle of innovation. It has invested a total of more than one

billion dollars in research and development alone. At its facilities in Delaware and throughout the United States, InterDigital researches, develops, engineers, and licenses advanced video-related innovations as well as other cutting-edge technology. InterDigital's world-class Research and Innovation Lab—with locations in Indiana, New Jersey, and Washington, D.C.—has designed and developed a range of key technologies instrumental to video coding.

15. InterDigital and its employees' technical contributions have been recognized all over the world. As just one example, InterDigital has repeatedly been named as one of the world's 100 most innovative businesses by LexisNexis. *See* Exs. 14-16 (LexisNexis Innovation Momentum Reports). From mobile technologies that underpin smartphones, networks, and services to video technologies that are the foundation for today's most popular products and services, InterDigital's research and development teams help improve every product they work on, from the most basic to the most advanced. Today, InterDigital still follows in the footsteps of its founder, developing an even more connected world.

16. As one of the world's largest pure research and innovation companies, InterDigital relies on its inventions to enable its future research and development efforts. In particular, InterDigital relies on obtaining fair compensation for its novel contributions to technological advancements in multiple industry segments, including video technologies, to fund its ongoing work breaking new ground for implementers and consumers alike.

17. InterDigital's research and innovation work has resulted in a patent portfolio totaling over 38,000 patent assets, with a strong emphasis on video technologies and wireless telecommunications. More specifically, InterDigital has approximately 6,800 patents in its video portfolio, with over 3,500 patents and applications relating to current and developing codec technologies such as AVC, HEVC, VP9, AV1, and VVC. InterDigital also has a portfolio of video-

related patents including those related to improved dynamic range and many other improvements to the user video experience.

**B. Proposed Respondents**

18. On information and belief, Respondent TCL Industries Holdings Co., Ltd. (“TCL Industries”) is a corporation organized and existing under the laws of the People’s Republic of China with a principal place of business at 22nd Floor, TCL Technical Tower, Huifeng Third Road, Zhongkai Development Zone, Huizhou, Guangdong, P.R. China 516006. On information and belief, TCL Industries is the ultimate parent of and/or controls the other TCL Respondents. On information and belief, TCL Industries is involved with the manufacturing, importation, and/or sale for importation into the United States of the TCL Accused Products.

19. On information and belief, Respondent TCL Technology Group Corporation is a corporation organized and existing under the laws of People’s Republic of China with a principal place of business located at TCL Technology Building, No. 17, Huifeng Third Road, Zhongkai High-Tech Development Zone, Huizhou, Guangdong, P.R. China 516001. On information and belief, TCL Technology Group Corporation is involved with the manufacturing, importation, and/or sale for importation into the United States of the TCL Accused Products.

20. On information and belief, Respondent TCL Electronics Holdings Limited is a limited liability company organized and existing under the laws of the Cayman Islands with a principal place of business at 5th Floor, Building 22E, 22 Science Park East Avenue, Hong Kong Science Park, Shatin, New Territories, Hong Kong SAR, China. On information and belief, TCL Electronics Holdings Limited is a subsidiary of and/or controlled by TCL Industries. On information and belief, TCL Electronics Holdings Limited is involved with the manufacturing, importation, and/or sale for importation into the United States of the TCL Accused Products.

21. On information and belief, Respondent Shenzhen TCL New Technology Co., Ltd. is a corporation organized and existing under the laws of the People's Republic of China with a principal place of business at 9th Floor, TCL Electronics Holdings Limited Building, TCL International E City, No. 1001, Zhongshan Park Road, Nanshan District, Shenzhen, Guangdong, P.R. China. On information and belief, Shenzhen TCL New Technology Co., Ltd. is a subsidiary of and/or controlled by TCL Industries. On information and belief, Shenzhen TCL New Technology Co., Ltd. is involved with the manufacturing, importation, and/or sale for importation into the United States of the TCL Accused Products.

22. On information and belief, Respondent TCL King Electrical Appliances (Huizhou) Company Limited is a corporation organized and existing under the laws of the People's Republic of China with a principal place of business at No. 78, Huifeng 4 Road, Zhongkai Development Zone Huizhou, 516006 P.R. China. On information and belief, TCL King Electrical Appliances (Huizhou) Company Limited is a subsidiary of and/or controlled by TCL Industries. On information and belief, TCL King Electrical Appliances (Huizhou) Company Limited is involved with the manufacturing, importation, and/or sale for importation into the United States of the TCL Accused Products.

23. On information and belief, Respondent TCL Overseas Marketing Limited is a corporation organized and existing under the laws of the British Virgin Islands with a principal place of business at 5th Floor, Building 22E, 22 Science Park East Avenue, Hong Kong Science Park, Shatin, New Territories, Hong Kong SAR, China. On information and belief, TCL Overseas Marketing Limited is a subsidiary of and/or controlled by TCL Industries. On information and belief, TCL Overseas Marketing Limited is involved with the manufacturing, importation, and/or sale for importation into the United States of the TCL Accused Products.

24. On information and belief, Respondent TCL Smart Device (Vietnam) Company Limited is a corporation organized and existing under the laws of Vietnam with a principal place of business at No. 26 VSIP II-A, Street 32, Vietnam Singapore Industrial Park II-A, Tan Binh Commune, Bac Tan Uyen District, Binh Duong Province, 75000, Vietnam. On information and belief, TCL Smart Device (Vietnam) Company Limited is a subsidiary of and/or controlled by TCL Industries. On information and belief, TCL Smart Device (Vietnam) Company Limited is involved with manufacturing, importation, and/or sale for importation into the United States of the TCL Accused Products.

25. On information and belief, Respondent TCL Smart Screen Technology HK is a corporation organized and existing under the laws of Hong Kong SAR, China with a principal place of business at 5th Floor, Building 22E, 22 Science Park East Avenue, Hong Kong Science Park, Shatin, New Territories, Hong Kong SAR, China. On information and belief, TCL Smart Screen Technology HK is a subsidiary of and/or controlled by TCL Industries. On information and belief, TCL Smart Screen Technology HK is involved with the manufacturing, importation, and/or sale for importation into the United States of the TCL Accused Products.

26. On information and belief, Respondent TCL Moka International Ltd. is a corporation organized and existing under the laws of Hong Kong SAR, China with a principal place of business at 7th Floor, Building 22E, 22 Science Park East Avenue, Hong Kong Science Park, Shatin, New Territories, Hong Kong SAR, China. On information and belief, TCL Moka International Ltd. is a subsidiary of and/or controlled by TCL Industries. On information and belief, TCL Moka International Ltd. is involved with the manufacturing, importation, and/or sale for importation into the United States of the TCL Accused Products.

27. On information and belief, Respondent TTE Technology, Inc. is a corporation organized and existing under the laws of Delaware with a principal place of business at 1860 Compton Avenue, Corona, California 92881. On information and belief, TTE Technology, Inc. is a subsidiary of and/or controlled by TCL Industries. On information and belief, TTE Technology, Inc. is involved with the importation and/or sale after importation into the United States of the TCL Accused Products.

28. On information and belief, TCL imports and sells for and after importation into the United States the TCL Accused Products. Importation records list TCL King Electrical Appliances (Huizhou) Company Limited, TCL Overseas Marketing Limited, TCL Smart Device (Vietnam) Company Limited, TCL Smart Screen Technology HK, TCL Moka International Limited, and TTE Technology, Inc. as the importer and/or shipper of televisions shipped by or on behalf of TCL from at least the People's Republic of China, Vietnam, and Panama. Ex. 17 (TCL Importation Records). TCL admits to selling and importing televisions, including, on information and belief, the TCL Accused Products. For example, TCL Industries Holdings Co., Ltd., TCL Electronics Holdings Limited, Shenzhen TCL New Technology Co., Ltd., TCL King Electrical Appliances (Huizhou) Company Limited, TCL Overseas Marketing Limited, TCL Smart Device (Vietnam) Company Limited, and TTE Technology, Inc. admitted that "certain of their products are manufactured, assembled, and/or tested abroad prior to importation into the United States." *Certain Smart Televisions*, Inv. No. 337-TA-1461, Answer to Complaint (EDIS Doc. ID No. 865992) at ¶ 39-40; *see also id.* at ¶¶ 26, 28, 30-35, 37.

29. On information and belief, Respondent Hisense Co., Ltd. is a corporation organized and existing under the laws of the People's Republic of China with a principal place of business at Hisense Tower No. 17, Donghaixi Road, Qingdao, Shandong Province, 266071, P.R. China. On

information and belief, Hisense Co., Ltd. is the ultimate parent of and/or controls the other Hisense Respondents. On information and belief, Hisense Co., Ltd. is involved with the manufacturing, importation, and/or sale for importation into the United States of the Hisense Accused Products.

30. On information and belief, Respondent Hisense USA Corporation is a corporation organized and existing under the laws of the State of Georgia with a principal place of business at 7310 McGinnis Ferry Road, Suwanee, Georgia, 30024. On information and belief, Hisense USA Corporation is involved with the importation and/or sale after importation into the United States of the Hisense Accused Products. On information and belief, Hisense Co., Ltd. is the parent company of Hisense USA Corporation.

31. On information and belief, Respondent Hisense Electronics Manufacturing Company of America Corporation is a corporation organized and existing under the laws of the State of Georgia with a principal place of business at 7310 McGinnis Ferry Road, Suwanee, Georgia 30024. On information and belief, Hisense Electronics Manufacturing Company of America Corporation is involved with the importation and/or sale after importation into the United States of the Hisense Accused Products. On information and belief, Hisense Co., Ltd. is the parent company of Hisense Electronics Manufacturing Company of America Corporation.

32. On information and belief, Hisense imports and sells for and after importation into the United States the Hisense Accused Products. Importation records list Hisense USA Corporation and Hisense Electronics Manufacturing Company of America Corporation as the importer for imported televisions shipped by or on behalf of Hisense from at least the People's Republic of China and the Republic of China. Ex. 18 (Hisense Importation Records). Moreover, Hisense admits to importing televisions, including, on information and belief, the Hisense Accused Products. Ex. 19 (*LG Elecs. Inc. v. Hisense Elecs. Mfg.*, Case No. 2:19-cv-9474, Complaint and

Answer at ¶ 3 (C.D. Cal. Mar. 30, 2020)) (admitting that Hisense Electronics Manufacturing Company of America Corporation “has been involved in the importation of accused products and components thereof to be manufactured abroad, including in Mexico”); *see also Certain Digital Video-Capable Devices and Components Thereof*, Inv. No. 337-TA-1224, Answer to Complaint (EDIS Doc. ID No. 726505) at ¶ 27 (admitting that Hisense Electronics Manufacturing Company of America Corporation is “engaged in the importation of certain video-capable computing and display devices into the United States” and Hisense USA Corporation is “engage[d] in the distribution and sales of certain video-capable computing and display devices in the United States”) and ¶¶ 111-113 (same).

### **III. RELATED LITIGATION**

33. The '877 Patent was previously involved in *Electronic Devices Including Smartphones, Computers, Tablet Computers, and Components Thereof*, Inv. No. 337-TA-1373 (ITC) and *InterDigital, Inc. v. Lenovo (United States) Inc.*, Case No. 5:23-cv-493 (E.D.N.C.). The '877 Patent is also involved in *Amazon.com, Inc. v. InterDigital, Inc.*, IPR2026-00195 (PTAB), which has not been instituted as of the date of this Complaint’s filing.

34. A parallel U.S. district court proceeding was filed on February 9, 2026, in the U.S. District Court for the Eastern District of Texas, alleging infringement of the Asserted Patents by TCL.

35. A parallel U.S. district court proceeding was filed on February 9, 2026, in the U.S. District Court for the Northern District of Georgia, alleging infringement of the Asserted Patents by Hisense.

36. The patents asserted in this Complaint are not otherwise subject to any litigation.

## **IV. THE PATENTS**

### **A. The Asserted '846 Patent**

#### **1. Identification of the Patent and Ownership**

37. United States Patent No. 8,085,846 is entitled “Method and Apparatus for Decoding Hybrid Intra-Inter Coded Blocks” and issued on December 27, 2011. The '846 Patent expires on November 18, 2028, is based on U.S. Application No. 10/569,319, filed as Application No. PCT/US2004/027397 on August 24, 2004, and claims priority to U.S. Application No. 60/497,816, filed on August 26, 2003.

38. InterDigital Madison Patent Holdings SAS owns, by assignment, all right, title, and interest in and to the '846 Patent. The inventors of the '846 Patent, Alexandros Tourapis, Jill MacDonald Boyce, and Peng Yin, assigned their rights in the '846 Patent to Thomson Licensing S.A. in 2004. Thomson Licensing S.A. assigned its rights in the '846 Patent to Thomson Licensing in 2006. Thomson Licensing assigned its rights in the '846 Patent to Thomson Licensing DTV in 2017. Thomson Licensing DTV assigned its rights in the '846 Patent to InterDigital Madison Patent Holdings SAS in 2018. Certified copies of the assignments are attached as Exhibit 7.

39. A certified copy of the '846 Patent is submitted as Exhibit 1. A certified copy of the U.S. Patent and Trademark Office file history for the '846 Patent and a copy of the prosecution histories of any priority applications are submitted as Appendix A and Appendix G, respectively.

#### **2. Non-Technical Description of the Patent**

40. The '846 Patent describes, among other things, a method and device for hybrid intra-inter bi-predictive coding. In conventional video compression, each block of an image is predicted using either information from the same image (intra prediction) or from a previous or future image in the sequence (inter prediction). The '846 Patent introduces a hybrid approach that

allows both intra and inter predictions to be combined for a single block. The invention of the '846 Patent allows for improved compression, reduced error propagation, and enhanced video quality.

41. At a high level, a video decoder processes data representing a two-dimensional video image which has been produced by a conventional commercially available video camera. The '846 Patent discloses a video decoder that receives and decodes a data stream that may contain a hybrid intra-inter bi-predictive (or multi-predictive) block. The hybrid intra-inter bi-predictive (or multiple-predictive) coding mode allows both intraframe (intra) and interframe (inter) predictions to be combined together for a current macroblock or a sub-block.

## **B. The Asserted '784 Patent**

### **1. Identification of the Patent and Ownership**

42. United States Patent No. 9,294,784 is entitled "Method and Apparatus for Region-Based Filter Parameter Selection for De-Artifact Filtering" and issued on March 22, 2016. The '784 Patent expires on April 11, 2032, is based on U.S. Application No. 13/138,626, filed as PCT Application No. PCT/US2010/000715 on March 10, 2010, and claims priority to U.S. Application No. 61/159,573 filed on March 12, 2009.

43. InterDigital Madison Patent Holdings SAS owns, by assignment, all right, title, and interest in and to the '784 Patent. The inventors of the '784 Patent, Yunfei Zheng, Qian Xu, Joel Sole, Peng Yin, and Xiaoan Lu assigned their rights in the '784 Patent to Thomson Licensing in 2009. Thomson Licensing assigned its rights in the '784 Patent to Thomson Licensing DTV in 2017. Thomson Licensing DTV assigned its rights to the '784 Patent to InterDigital Madison Patent Holdings SAS in 2018. Certified copies of the assignments are attached as Exhibit 8.

44. A certified copy of the '784 Patent is submitted as Exhibit 2. A certified copy of the U.S. Patent and Trademark Office file history for the '784 Patent and a copy of the prosecution histories of any priority applications are submitted as Appendix B and Appendix H, respectively.

## **2. Non-Technical Description of the Patent**

45. The '784 Patent describes, among other things, a method and device for region-based filter parameter selection and de-artifact filtering. The device includes a decoder for decoding picture data for at least a region of a picture. The decoder uses a de-artifact filter for performing de-artifact filtering on the region using region-based filter parameter selection. The region-based filter parameter is not signaled in a bit stream and is adapted based on local variance of the region. The region includes any of a non-block-boundary, a block boundary, a combination thereof, and the non-block-boundary to an exclusion of any block boundaries.

### **C. The Asserted '877 Patent**

#### **1. Identification of the Patent and Ownership**

46. United States Patent No. 10,250,877 is entitled “Method and Device for Coding an Image Block, Corresponding Decoding Method and Decoding Device” and issued on April 2, 2019. The '877 Patent expires on May 22, 2035, is based on U.S. Application No. 14/372,021, filed as PCT Application No. PCT/EP2013/050399 on January 10, 2013, and claims priority to FR1250334, filed on January 13, 2012.

47. InterDigital Madison Patent Holdings SAS owns, by assignment, all right, title, and interest in and to the '877 Patent. The inventors of the '877 Patent, Philippe Bordes, Pierre Andrivon, and Philippe Salmon, assigned their rights in the '877 Patent to Thomson Licensing in 2013. Thomson Licensing assigned its rights in the '877 Patent to Thomson Licensing DTV in 2017. Thomson Licensing DTV assigned its rights in the '877 Patent to InterDigital Madison Patent Holdings SAS in 2018. Certified copies of the assignments are attached as Exhibit 9.

48. A certified copy of the '877 Patent is submitted as Exhibit 3. A certified copy of the U.S. Patent and Trademark Office file history for the '877 Patent and a copy of the prosecution histories of any priority applications are submitted as Appendix C and Appendix I, respectively.

## **2. Non-Technical Description of the Patent**

49. The '877 Patent describes, among other things, a device and method for reconstructing a current block of a current image from at least one block of a reconstructed reference image that is at a different size from the size of the current image. At a high level, in order to compress a video file, redundant information is removed from the video sequence to reduce the size of the video file. A decoder can reconstruct a compressed video frame using information from a previously reconstructed reference image. When the target bitrate is low, an image to be coded can be subsampled prior to encoding in a process called adaptive resolution that results in a reduced image size. Then, the decoder can up-sample the decoded image to restore its size before display. But when this process results in a reference image and a current image to be reconstructed having different sizes, the reference image is resized by resampling to match the size of the current image before being motion compensated. This may include storing the reconstructed reference images and resized reference images of various sizes in the decoded picture buffer (DPB) memory, which may require greater memory space.

50. The device and method of the '877 Patent advantageously groups horizontal motion compensation interpolation and horizontal resampling filters into a single filter applied to the lines of a pixel block; and vertical motion compensation interpolation and vertical resampling filters are applied jointly as a single vertical filter on the columns of a pixel block. Thus, unlike previous methods for reconstructing image blocks, the method of the '877 Patent does not require the storage of resized, *i.e.*, up-sampled and/or subsampled, versions of the reference image in the DPB memory.

## **D. The Asserted '962 Patent**

### **1. Identification of the Patent and Ownership**

51. United States Patent No. 11,695,962 is entitled “Encoding and Decoding Methods and Corresponding Devices” and issued on July 4, 2023. The '962 Patent expires on November 7, 2038, is based on U.S. Application No. 16/766,361, filed as PCT Application No. PCT/US2018/059579 on May 22, 2020, and claims priority to European Patent Application No. 17306628.3, filed on November 23, 2017.

52. InterDigital VC Holdings, Inc. owns, by assignment, all right, title, and interest in and to the '962 Patent. The inventors of the '962 Patent, Fabrice Le Leannec, Tangi Poirier, and Ya Chen, assigned their rights in the '962 Patent to InterDigital VC Holdings, Inc. in 2019. Copies of the assignments are attached as Exhibit 10.

53. A certified copy of the '962 Patent is submitted as Exhibit 4. A certified copy of the U.S. Patent and Trademark Office file history for the '962 Patent and a copy of the prosecution histories of any priority applications are submitted as Appendix D and Appendix J, respectively.

### **2. Non-Technical Description of the Patent**

54. The '962 Patent describes, among other things, a device and method for decoding. The method and device determines a context for a syntax element associated with a current transform coefficient of a current sub-block of a picture. The current sub-block results from a partitioning of a current block of samples, which is according to a split mode for splitting the block into rectangular sub-blocks and/or square sub-blocks. The context is determined based on the area of said sub-block, on the position of the current transform coefficient within the sub-block, and on transform coefficients in a local template. The local template is a subset of transform coefficients of said sub-block where the subset comprises transform coefficients in a causal neighborhood of the current transform coefficient. At least one of the transform coefficients of the local template

with respect to the current transform coefficient depends on the shape of the sub-block resulting from the partitioning. The method and device decodes the syntax element based at least on the determined context.

**E. The Asserted '168 Patent**

**1. Identification of the Patent and Ownership**

55. United States Patent No. 11,399,168 is entitled “Method for Encoding and Method for Decoding a Color Transform and Corresponding Devices” and issued on July 26, 2022. The '168 Patent expires on July 10, 2034, is based on U.S. Application No. 17/234,366, filed on April 19, 2021, and claims priority to European Patent Application No. 13306010.3, filed on July 15, 2013, European Patent Application No. 13306068.1, filed on July 24, 2013, European Patent Application No. 13306291.9, filed on Sept. 23, 2013, and European Patent Application No. 13306707.4, filed on December 12, 2013.

56. InterDigital VC Holdings, Inc. owns, by assignment, all right, title, and interest in and to the '168 Patent. The inventors of the '168 Patent, Pierre Andrivon, Philippe Bordes, and Emmanuel Jolly, assigned their rights in the '168 Patent to Thomson Licensing in 2016. Thomson Licensing assigned its rights in the '168 Patent to InterDigital VC Holdings, Inc. in 2018. Copies of the assignments are attached as Exhibit 11.<sup>2</sup>

57. A copy of the '168 Patent is submitted as Exhibit 5. A copy of the U.S. Patent and Trademark Office file history for the '168 Patent and a copy of the prosecution histories of any priority applications are submitted as Appendix E and Appendix K, respectively.

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<sup>2</sup> InterDigital has ordered certified copies of the '168 Patent, its assignment records, and its prosecution history. Once the certified copies are available, InterDigital will supplement the Complaint accordingly.

## **2. Non-Technical Description of the Patent**

58. The '168 Patent describes, among other things, a method and apparatus for encoding target parameters describing characteristics for a target color space for a video picture to be displayed in the target color space and encoding color transform parameters that facilitate remapping the video picture to the target color space. The method and apparatus include decoding target parameters describing characteristics for a target color space for a video picture to be displayed in the target color space, decoding color transform parameters that facilitate remapping the video picture to the target color space, remapping the video picture to the target color space utilizing at least one of the decoded color transform parameters, and displaying the remapped video picture in the target color space. The color transform parameters represent at least three successively applied color transforms comprising a first color transform followed by a second color transform followed by a third color transform.

### **F. The Asserted '751 Patent**

#### **1. Identification of the Patent and Ownership**

59. United States Patent No. 9,654,751 is entitled “Method, Apparatus and System for Providing Color Grading for Displays” and issued on May 16, 2017. The '751 Patent expires on December 22, 2029, is based on U.S. Application No. 12/448,394, filed as PCT/US2006/049072 on December 21, 2006.

60. InterDigital Madison Patent Holdings SAS owns, by assignment, all right, title, and interest in and to the '751 Patent. The inventors of the '751 Patent, Ingo Tobias Doser, Xueming Henry Gu, Pierre Jean Ollivier, Michael Allan Sterling, Bongsun Lee, Rainer Zwing, Carlos Correa, and Jurgen Stauder, assigned their rights in the '751 Patent to Thomson Licensing in 2007. Thomson Licensing assigned its rights in the '751 Patent to Thomson Licensing DTV in 2018.

Thomson Licensing DTV assigned its rights in the '751 Patent to InterDigital Madison Patent Holdings SAS in 2018. Copies of the assignments are attached as Exhibit 12.<sup>3</sup>

61. A copy of the '751 Patent is submitted as Exhibit 6. A copy of the U.S. Patent and Trademark Office file history for the '751 Patent and a copy of the prosecution histories of any priority applications are submitted as Appendix F and Appendix L, respectively.

## **2. Non-Technical Description of the Patent**

62. The '751 Patent describes, among other things, a method, apparatus, and system including a display unit for processing a plurality of picture data and the display includes a display specification including a display requirement or requirements. A picture selector obtains the plurality of picture data and is operative to access a plurality of different virtual device models. Each virtual device model includes at least one parameter for specifying at least one display feature. The picture selector is configured to select a virtual device model to control a display picture provided by the display, based on a comparison between the virtual device models and the display specification of the display. The picture selector is also configured to select one of the plurality of the picture data based on the selected one of the virtual device models. A picture calibration component is configured to adapt the selected one of the plurality of picture data selected by the picture selector to be displayed on the same display based on the selected virtual device model.

## **V. Licenses Relating to the Asserted Patents**

63. As required under Commission Rule 210.12(a)(9)(iii), a list of the currently licensed entities is attached to this Complaint. *See* Ex. 20 (List of Licensees to Asserted Patents).

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<sup>3</sup> InterDigital has ordered certified copies of the '751 Patent, its assignment records, and its prosecution history. Once the certified copies are available, InterDigital will supplement the Complaint accordingly.

**A. Foreign and Domestic Counterparts to the Asserted Patents**

64. Attached as Appendices M-R are lists of each foreign patent, each foreign or domestic patent application, and each foreign or domestic patent application that has been denied, abandoned or withdrawn, corresponding to each Asserted Patent, with an indication of the prosecution status of each such patent application.

**VI. UNLAWFUL AND UNFAIR ACTS OF PROPOSED RESPONDENTS**

65. Proposed Respondents have engaged in unfair trade practices, including the sale for importation, importation, and/or sale after importation of certain electronic devices, including smart televisions, monitors, and components thereof, that infringe the asserted claims of the Asserted Patents. These activities by Proposed Respondents constitute a violation of Section 337.

66. Complainants assert that Proposed Respondents directly infringe, literally or under the doctrine of equivalents and/or actively contribute to and/or induce the infringement of one or more asserted claims of the Asserted Patents. This Complaint includes charts comparing claims of the Asserted Patents to exemplary products and photographs of the exemplary infringing devices and services. Complainants assert that the Accused Products infringe the claims set forth in Exhibits 21-32. Discovery may reveal that the Accused Products and/or Proposed Respondents infringe additional claims of the Asserted Patents.

67. The infringement allegations contained in this Complaint include the Proposed Respondents' (i) direct infringement of the asserted claims (literally and/or under the doctrine of equivalents) and/or (ii) infringement by inducement by exhibiting an affirmative intent to cause direct infringement of the asserted claims and/or (iii) infringement by contributing to the direct infringement of the asserted claims.

68. Proposed Respondents have been given notice of their infringement by, among other things, the filing and service of this Complaint.

69. Proposed Respondents induce, and continue to induce, others to infringe the asserted claims. Proposed Respondents have taken active steps to encourage and facilitate direct infringement by others, such as sellers, distributors, and users of the Accused Products, with knowledge that infringement, such as by contracting for the distribution of the Accused Products, by marketing the Accused Products, and by creating and/or distributing user manuals, white papers, datasheets, marketing materials, and/or similar materials with instructions on using the Accused Products in an infringing manner. *See* Exs. 33-34 (TCL and Hisense websites marketing Accused Products and encouraging users to stream video). The use of the Accused Products in their ordinary and customary fashion results in infringement of the asserted claims. *Id.*

**A. Infringement of the '846 Patent**

70. On information and belief, the Accused Products that are sold for importation, imported, and/or sold within the United States after importation by Respondents infringe at least claims 1, 4, 5, 9, 10, 11, 13, 14, 15, 16, 17, 18, 19, 20, 21, and 22 of the '846 Patent, either literally or under the doctrine of equivalents.

71. On information and belief, Respondents directly infringe one or more claims of the '846 Patent through their manufacture, sale for importation, importation, use, and sale after importation of one or more Accused Products. The Accused Products include exemplary products Hisense 55-Inch U7 Mini LED ULED 4K UHD Smart TV and TCL 65-Inch Class QM7K Series Mini LED QLED 4K HDR Smart TV, each of which infringes the Asserted Claims of the '846 Patent. These products are examples of the Accused Products, and other products infringe one or more claims of the '846 Patent in a similar manner. For example, other smart televisions and monitors infringe one or more claims of the '846 Patent.

72. On information and belief, Respondents knowingly and intentionally induce users of one or more of the Accused Products to directly infringe one or more claims of the '846 Patent by encouraging, instructing, and aiding one or more persons in the United States, including Respondents' employees who test and operate Accused Products at the direction of Respondents, to make, use (including testing those devices and methods), sell, or offer to sell one or more of the Accused Products, during or after such article's importation into the United States, in a manner that infringes the '846 Patent. *See, e.g.*, Ex. 33 (TCL advertising products for sale and their capabilities); Ex. 34 (Hisense advertising products for sale and their capabilities). On information and belief, Respondents were aware of the '846 Patent or acted with willful blindness as to its existence at least as a result of the filing of the parallel district court case discussed above and as a result of the filing and service of this Complaint.

73. Claim charts that apply each of the asserted independent claims of the '846 Patent to the Accused Products are attached as Exhibits 21-22.

**B. Infringement of the '784 Patent**

74. On information and belief, the Accused Products that are sold for importation, imported, and/or sold within the United States after importation by Respondents infringe at least claims 9, 13, and 15 of the '784 Patent, either literally or under the doctrine of equivalents.

75. On information and belief, Respondents directly infringe one or more claims of the '784 Patent through their manufacture, sale for importation, importation, use, and sale after importation of one or more Accused Products. The Accused Products include exemplary products Hisense 55-Inch U7 Mini LED ULED 4K UHD Smart TV and TCL 65-Inch Class QM7K Series Mini LED QLED 4K HDR Smart TV, each of which infringes the Asserted Claims of the '784 Patent. These products are examples of the Accused Products, and other products infringe one or

more claims of the '784 Patent in a similar manner. For example, other smart televisions and monitors infringe one or more claims of the '784 Patent.

76. On information and belief, Respondents knowingly and intentionally induce users of one or more of the Accused Products to directly infringe one or more claims of the '784 Patent by encouraging, instructing, and aiding one or more persons in the United States, including Respondents' employees who test and operate Accused Products at the direction of Respondents, to make, use (including testing those devices and methods), sell, or offer to sell one or more of the Accused Products, during or after such article's importation into the United States, in a manner that infringes the '784 Patent. *See, e.g.*, Ex. 33 (TCL advertising products for sale and their capabilities); Ex. 34 (Hisense advertising products for sale and their capabilities). On information and belief, Respondents were aware of the '784 Patent or acted with willful blindness as to its existence at least as a result of the filing of the parallel district court case discussed above and as a result of the filing and service of this Complaint.

77. Claim charts that apply each of the asserted independent claims of the '784 Patent to the Accused Products are attached as Exhibits 23-24.

### **C. Infringement of the '877 Patent**

78. On information and belief, the Accused Products that are sold for importation, imported, and/or sold within the United States after importation by Respondents infringe at least claims 1, 4, 7, and 8 of the '877 Patent, either literally or under the doctrine of equivalents.

79. On information and belief, Respondents directly infringe one or more claims of the '877 Patent through their manufacture, sale for importation, importation, use, and sale after importation of one or more Accused Products. The Accused Products include exemplary products Hisense 55-Inch U7 Mini LED ULED 4K UHD Smart TV and TCL 65-Inch Class QM7K Series

Mini LED QLED 4K HDR Smart TV, each of which infringes the Asserted Claims of the '877 Patent. These products are examples of the Accused Products, and other products infringe one or more claims of the '877 Patent in a similar manner. For example, other smart televisions and monitors infringe one or more claims of the '877 Patent.

80. On information and belief, Respondents knowingly and intentionally induce users of one or more of the Accused Products to directly infringe one or more claims of the '877 Patent by encouraging, instructing, and aiding one or more persons in the United States, including Respondents' employees who test and operate Accused Products at the direction of Respondents, to make, use (including testing those devices and methods), sell, or offer to sell one or more of the Accused Products, during or after such article's importation into the United States, in a manner that infringes the '877 Patent. *See, e.g.*, Ex. 33 (TCL advertising products for sale and their capabilities); Ex. 34 (Hisense advertising products for sale and their capabilities). On information and belief, Respondents were aware of the '877 Patent or acted with willful blindness as to its existence at least as a result of the filing of the parallel district court case discussed above and as a result of the filing and service of this Complaint.

81. Claim charts that apply each of the asserted independent claims of the '877 Patent to the Accused Products are attached as Exhibits 25-26.

#### **D. Infringement of the '962 Patent**

82. On information and belief, the Accused Products that are sold for importation, imported, and/or sold within the United States after importation by Respondents infringe at least claims 1, 3, 13, and 15 of the '962 Patent, either literally or under the doctrine of equivalents.

83. On information and belief, Respondents directly infringe one or more claims of the '962 Patent through their manufacture, sale for importation, importation, use, and sale after

importation of one or more Accused Products. The Accused Products include exemplary products Hisense 55-Inch U7 Mini LED ULED 4K UHD Smart TV and TCL 65-Inch Class QM7K Series Mini LED QLED 4K HDR Smart TV, each of which infringes the Asserted Claims of the '962 Patent. These products are examples of the Accused Products, and other products infringe one or more claims of the '962 Patent in a similar manner. For example, other smart televisions and monitors infringe one or more claims of the '962 Patent.

84. On information and belief, Respondents knowingly and intentionally induce users of one or more of the Accused Products to directly infringe one or more claims of the '962 Patent by encouraging, instructing, and aiding one or more persons in the United States, including Respondents' employees who test and operate Accused Products at the direction of Respondents, to make, use (including testing those devices and methods), sell, or offer to sell one or more of the Accused Products, during or after such article's importation into the United States, in a manner that infringes the '962 Patent. *See, e.g.,* Ex. 33 (TCL advertising products for sale and their capabilities); Ex. 34 (Hisense advertising products for sale and their capabilities). On information and belief, Respondents were aware of the '962 Patent or acted with willful blindness as to its existence at least as a result of the filing of the parallel district court case discussed above and as a result of the filing and service of this Complaint.

85. Claim charts that apply each of the asserted independent claims of the '962 Patent to the Accused Products are attached as Exhibits 27-28.

#### **E. Infringement of the '168 Patent**

86. On information and belief, the Accused Products that are sold for importation, imported, and/or sold within the United States after importation by Respondents infringe at least claims 18, 19, and 20 of the '168 Patent, either literally or under the doctrine of equivalents.

87. On information and belief, Respondents directly infringe one or more claims of the '168 Patent through their manufacture, sale for importation, importation, use, and sale after importation of one or more Accused Products. The Accused Products include exemplary products Hisense 55-Inch U7 Mini LED ULED 4K UHD Smart TV and TCL 65-Inch Class QM7K Series Mini LED QLED 4K HDR Smart TV, each of which infringes the Asserted Claims of the '168 Patent. These products are examples of the Accused Products, and other products infringe one or more claims of the '168 Patent in a similar manner. For example, other smart televisions and monitors infringe one or more claims of the '168 Patent.

88. On information and belief, Respondents knowingly and intentionally induce users of one or more of the Accused Products to directly infringe one or more claims of the '168 Patent by encouraging, instructing, and aiding one or more persons in the United States, including Respondents' employees who test and operate Accused Products at the direction of Respondents, to make, use (including testing those devices and methods), sell, or offer to sell one or more of the Accused Products, during or after such article's importation into the United States, in a manner that infringes the '168 Patent. *See, e.g.,* Ex. 33 (TCL advertising products for sale and their capabilities); Ex. 34 (Hisense advertising products for sale and their capabilities). On information and belief, Respondents were aware of the '168 Patent or acted with willful blindness as to its existence at least as a result of the filing of the parallel district court case discussed above and as a result of the filing and service of this Complaint.

89. Claim charts that apply each of the asserted independent claims of the '168 Patent to the Accused Products are attached as Exhibits 29-30.

**F. Infringement of the '751 Patent**

90. On information and belief, the Accused Products that are sold for importation, imported, and/or sold within the United States after importation by Respondents infringe at least claims 14 and 15 of the '751 Patent, either literally or under the doctrine of equivalents.

91. On information and belief, Respondents directly infringe one or more claims of the '751 Patent through their manufacture, sale for importation, importation, use, and sale after importation of one or more Accused Products. The Accused Products include exemplary products Hisense 55-Inch U7 Mini LED ULED 4K UHD Smart TV and TCL 65-Inch Class QM7K Series Mini LED QLED 4K HDR Smart TV, each of which infringes the Asserted Claims of the '751 Patent. These products are examples of the Accused Products, and other products infringe one or more claims of the '751 Patent in a similar manner. For example, other smart televisions and monitors infringe one or more claims of the '751 Patent.

92. On information and belief, Respondents knowingly and intentionally induce users of one or more of the Accused Products to directly infringe one or more claims of the '751 Patent by encouraging, instructing, and aiding one or more persons in the United States, including Respondents' employees who test and operate Accused Products at the direction of Respondents, to make, use (including testing those devices and methods), sell, or offer to sell one or more of the Accused Products, during or after such article's importation into the United States, in a manner that infringes the '751 Patent. *See, e.g.*, Ex. 33 (TCL advertising products for sale and their capabilities); Ex. 34 (Hisense advertising products for sale and their capabilities). On information and belief, Respondents were aware of the '751 Patent or acted with willful blindness as to its existence at least as a result of the filing of the parallel district court case discussed above and as a result of the filing and service of this Complaint.

93. Claim charts that apply each of the asserted independent claims of the '751 Patent to the Accused Products are attached as Exhibits 31-32.

## **VII. SPECIFIC INSTANCES OF UNFAIR IMPORTATION AND SALE**

### **A. TCL Importation and Sale**

94. TCL's Accused Products are manufactured and assembled at foreign facilities. For example, each TCL product includes statements made indicating a foreign country of origin, such as "Manufactured in Vietnam." *See* Ex. 36 (Lareau Declaration) at ¶ 3 and Ex. B (TCL Model 65QM7K Product Image) thereto.

95. The Accused Products are then sold for importation into the United States, imported into the United States, sold within the United States after importation, and/or offered for sale after importation. The Accused Products are available for purchase in the United States. *See, e.g.*, Ex. 33 (TCL products for sale on TCL website). In addition, numerous third-party websites and stores in the United States sell the Accused Products. *See, e.g.*, Ex. 37 (third-party sellers advertising sale of TCL products). TCL's devices are available to purchase at these same locations.

96. Pursuant to Commission Rule 210.12(a)(3), Exhibit A to the Declaration of Stephen Lareau ("Lareau Declaration") (Ex. 36) contains the receipt showing a sale of an exemplary article, within the United States after importation into the United States. A TCL 65-Inch Class QM7K Series Mini LED QLED 4K HDR Smart TV was purchased online in the United States on October 23, 2025, for shipment to 1120 S Tryon Street, Suite 300, Charlotte, North Carolina 28203. *See* Ex. 36 (Lareau Declaration) at ¶ 2 and Ex. A (TCL Model 65QM7K Receipt of U.S. Sale) thereto. The product arrived in Charlotte, North Carolina, on October 24, 2025. *See id.* The TCL 65-Inch Class QM7K Series Mini LED QLED 4K HDR Smart TV was made in Vietnam. Ex. 36 (Lareau Declaration) at ¶ 3 and Ex. B (TCL Model 65QM7K Product Image) thereto (identifying Vietnam

as product's country of origin). Therefore, the exemplary TCL 65-Inch Class QM7K Series Mini LED QLED 4K HDR Smart TV was imported.

**B. Hisense Importation and Sale**

97. Hisense's Accused Products are manufactured and assembled at foreign facilities. For example, each Hisense product includes statements made indicating a foreign country of origin, such as "Made in Mexico." *See* Ex. 36 (Lareau Declaration) at ¶ 5 and Ex. D (Hisense Model 55U75QG Product Image) thereto.

98. The Accused Products are then sold for importation into the United States, imported into the United States, sold within the United States after importation, and/or offered for sale after importation. The Accused Products are available for purchase in the United States. *See, e.g.*, Ex. 34 (Hisense products for sale on Hisense website). In addition, numerous third-party websites and stores in the United States sell the Accused Products. *See, e.g.*, Ex. 38 (third-party sellers advertising sale of Hisense products). Hisense's devices are available to purchase at these same locations.

99. Pursuant to Commission Rule 210.12(a)(3), Exhibit C to the Lareau Declaration (Ex. 36) contains the receipt showing a sale of an exemplary article, within the United States after importation into the United States. A Hisense 55-Inch U7 Mini LED ULED 4K UHD Smart TV was purchased online in the United States on November 12, 2025, for shipment to 1120 S Tryon Street, Suite 300, Charlotte, North Carolina 28203. *See* Ex. 36 (Lareau Declaration) at ¶ 4 and Ex. C (Hisense Model 55U75QG Receipt of U.S. Sale) thereto. The product arrived in Charlotte, North Carolina, on November 13, 2025. *See id.* The Hisense 55-Inch U7 Mini LED ULED 4K UHD Smart TV was made in Mexico. Ex. 36 (Lareau Declaration) at ¶ 5 and Ex. D (Hisense Model

55U75QG Product Image) thereto. Therefore, the exemplary Hisense 55-Inch U7 Mini LED ULED 4K UHD Smart TV was imported.

### **VIII. HARMONIZED TARIFF SCHEDULE INFORMATION**

100. On information and belief, the Accused Products are believed to fall within at least the following Harmonized Tariff Schedule of the United States item number(s): 8528.72.64; 8528.72.72; 8529.10.21; 8529.90.55. These classifications are exemplary in nature and not intended to restrict the scope of any exclusion order or other remedy ordered by the investigation.

### **IX. THE DOMESTIC INDUSTRY**

101. In accordance with Section 337(a)(2) and (a)(3), a domestic industry exists within the United States in connection with each of the Asserted Patents.

102. The domestic activities of InterDigital's licensees independently and collectively satisfy the domestic industry requirement for the '846, '784, '877, '962, '168, and '751 Patents. For the purposes of this Complaint, InterDigital provides the following licensees of the Asserted Patents as exemplars of its domestic industry: Samsung Electronics Co., Ltd. ("SEC"), Samsung Electronics America ("SEA"), Samsung Austin Semiconductor ("SAS"), and Samsung Research America, Inc. ("SRA") (collectively, "Samsung"); Sony Group Corporation ("Sony Corp."), Sony Corporation of America ("SCA"), Sony Electronics Inc. ("SEL"), and Sony Interactive Entertainment ("SIE") (collectively, "Sony"); and LG Electronics, LG Electronics USA Inc. ("LG USA"), and LG Electronics Alabama, Inc. ("LG Alabama") (collectively, "LG").

103. Pursuant to Commission Rule 210.12(a)(9)(iv), Complainants have attached to the Complaint the following agreements authorizing the Domestic Industry Licensees to practice one or more of the Asserted Patents:

Ex. 39, a copy of the Patent License Agreement between InterDigital and Samsung;

Ex. 40, a copy of the Patent License Agreement between InterDigital and Sony;

Ex. 41, a copy of the Patent License Agreement between InterDigital and LG.

104. InterDigital intends to serve subpoenas on each of Samsung, Sony, and LG promptly following institution of the present investigation to obtain information and documents concerning their domestic activities, investments, and technical use of InterDigital's licensed technology relevant to the domestic industry requirement.

**A. Technical Prong**

**1. Summary of the Domestic Industry Products**

105. Each of the Domestic Industry Products<sup>4</sup> produced by Samsung, Sony, and LG incorporates the accused functionality of some or all of the Asserted Patents.

106. As demonstrated in the attached claim charts, the practicing of the AV1 specification necessarily practices the claims of the '846, '784, '877, and '962 Patents. Exs. 42-53. The Domestic Industry Products practice at least claims 1, 4, 5, 9, 10, 11, 13, 14, 15, 16, 17, 18, 19, 20, 21, and 22 of the '846 Patent, claims 9, 13, and 15 of the '784 Patent, claims 1, 4, 7, and 8 of the '877 Patent, and claims 1, 3, 13, and 15 of the '962 Patent. *See id.* Additionally, the Domestic Industry Products practice at least claims 18, 19, and 20 of the '168 Patent and claims 14 and 15 of the '751 Patents. Exs. 54-59.

107. Summarized, Complainants' domestic industry investments with respect to the Accused Patents comprise the following:

| Asserted Patent            | Domestic Industry Licensees |                   |
|----------------------------|-----------------------------|-------------------|
|                            | AV1                         | HDR               |
| U.S Patent No. 8,085,846   | Samsung, Sony, LG           | N/A               |
| U.S. Patent No. 9,294,784  | Samsung, Sony, LG           | N/A               |
| U.S Patent No. 10,250,877  | Samsung, Sony, LG           | N/A               |
| U.S Patent No. 11,695,962  | Samsung, Sony, LG           | N/A               |
| U.S. Patent No. 11,399,168 | N/A                         | Samsung, Sony, LG |

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<sup>4</sup> The Samsung Domestic Industry Products, Sony Domestic Industry Products, and LG Domestic Industry Products (defined below) are referred to collectively as the "Domestic Industry Products."

|                           |     |                   |
|---------------------------|-----|-------------------|
| U.S. Patent No. 9,654,751 | N/A | Samsung, Sony, LG |
|---------------------------|-----|-------------------|

## 2. Samsung's Domestic Industry Products

108. Samsung's domestic industry products include at least the following products: the Samsung Galaxy smartphones, Samsung Galaxy Tab tablets, and Samsung Galaxy Book laptops, among others (the "Samsung Domestic Industry Products").

109. For purposes of the complaint, InterDigital submits that the Samsung Galaxy S25 Ultra is exemplary of the Samsung Domestic Industry Products. *See* Ex. 60 (Samsung's own materials advertising the Samsung Domestic Industry Products possess video coding functionality). Exhibits 42, 45, 48, 51, 54, and 57 are charts that apply an exemplary claim of each Asserted Patent to an exemplary Samsung Domestic Industry Product.

## 3. Sony's Domestic Industry Products

110. Sony's domestic industry products include at least the following products: Sony's smart televisions, including BRAVIA 5 Mini LED 4K HDR Google TV (2025), BRAVIA 7 Mini LED QLED 4K HDR TV, BRAVIA 9 Mini LED QLED 4K HDR TV, BRAVIA 8 OLED 4K HDR TV, BRAVIA 8 II QD-OLED 4K HDR Google TV (2025), BRAVIA XR A95L QD-OLED 4K HDR TV, BRAVIA XR8B OLED 4K HDR Google TV (2025), BRAVIA XR X93CL Mini LED 4K HDR Google TV (2023), BRAVIA XR X90L Full Array LED 4K HDR Google TV (2023), BRAVIA 3 LED 4K HDR TV, BRAVIA 2 II 4K HDR LED Google TV (2025), BRAVIA XR A90K 4K HDR OLED TV, W830K 720p HD LED HDR TV, X77L 4K HDR LED TV, BRAVIA XR Z9K 8K HDR Mini LED TV, BRAVIA XR A80L OLED 4K HDR TV ("Sony TV Domestic Industry Products"), and PlayStation 5 and PlayStation 5 Pro ("Sony PlayStation Domestic Industry Products"), among others (collectively, the "Sony Domestic Industry Products").

111. For purposes of the complaint, InterDigital submits that the Sony BRAVIA 8 II 55” Class QD-OLED 4K HDR Google TV is exemplary of the Sony Domestic Industry Products. *See* Ex. 61 (Sony’s own materials advertising the Sony Domestic Industry Products possess video coding functionality). Exhibits 43, 46, 49, 52, 55, and 58 are charts that apply an exemplary claim of each Asserted Patent to an exemplary Sony Domestic Industry Product.

#### **4. LG’s Domestic Industry Products**

112. LG’s domestic industry products include at least the following products: LG televisions and monitors, among others (the “LG Domestic Industry Products”).

113. For purposes of the complaint, InterDigital submits that the LG C4 42 Inch Class OLED evo AI 4K Smart TV 2024 - OLED42C4PUA is exemplary of the LG Domestic Industry Products. *See* Ex. 62 (LG’s own materials advertising the LG Domestic Industry Products possess video coding functionality). Exhibits 44, 47, 50, 53, 56, and 59 are charts that apply an exemplary claim of each Asserted Patent to an exemplary LG Domestic Industry Product.

#### **B. Economic Prong**

114. Pursuant to Commission Rule 210.12(a)(6), a domestic industry exists under subsections (A), (B), and/or (C) of Section 337(a)(3) by virtue of InterDigital’s selected licensees’ activities and investments within the United States.

115. Samsung’s, Sony’s, and LG’s significant and substantial domestic investments satisfy the economic prong requirement in this investigation.<sup>5</sup> On information and belief, Samsung’s, Sony’s and LG’s total allocated expenditures in the United States relating to the Domestic Industry Products exceed tens of million dollars. By extension, taking any one or more

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<sup>5</sup> As shown in Ex. 20, there are many more licensees of the ’846, ’784, ’877, ’962, ’168, and ’751 Patents, and InterDigital may rely on one or more licensees during the investigation.

of these entities in any combination, and certainly in the aggregate, also satisfies the domestic industry requirement.

**1. Domestic Licensee Samsung's Domestic Activities and Investments**

116. InterDigital licensed Samsung to practice the '846, '784, '877, '962, '168, and '751 Patents, and to design, develop, manufacture, sell and distribute the Samsung Domestic Industry Products. Ex. 39.

117. Samsung has made, and continues to make, significant and substantial domestic investments within the United States in connection with the protected articles that practice the '846, '784, '877, '962, '168, and '751 Patents. Exhibits 42, 45, 48, 51, 54, and 57 are claim charts demonstrating that each of these patents is practiced by at least one of the Samsung Domestic Industry Products.

118. As a result of these investments, a domestic industry as defined by 19 U.S.C. § 1337(a)(3)(A) and (B) exists in the United States with respect to the Samsung Domestic Industry Products by virtue of Samsung's significant investment in plant and equipment and significant employment of labor and capital within the United States. A domestic industry defined by 19 U.S.C. § 1337(a)(3)(C) exists as well by virtue of Samsung's substantial investment in research and development and engineering related to the Samsung Domestic Industry Products.

119. Samsung's domestic industry consists of its significant and substantial investments in the research, development, engineering, support, readying for market, and post-sale service activities related to its major product lines in the United States. This includes discrete domestic investments in the following product categories: Samsung Galaxy smartphones, Samsung Galaxy Tab tablets, and Samsung Galaxy Book laptops.

120. As discussed below, each of these product categories individually evidences a substantial domestic industry under subparts (A), (B), and (C). The Samsung Galaxy product line

alone undergoes substantial investments in the United States by SEA in the research, development, testing, deployment in the United States. Upon information and belief, the investments in plant, equipment, labor, and capital in the activities discussed herein are significant and substantial in both the quantitative and qualitative contexts.

121. SEC has 65 subsidiaries in the Americas, including SEA, which is based in New Jersey and is responsible for the sales of finished products including smartphones, Samsung International Inc., which is based in California and is responsible for the manufacturing of consumer electronics, Samsung Semiconductor Inc., which is based in California and is responsible for the sales of semiconductors and DPs, SAS, which is based in Texas and is responsible for the manufacturing of semiconductor products, and Harman, which is based in Connecticut and is responsible for automotive components. Ex. 63 (Samsung Q3 2025 Interim Report) at 5.

122. InterDigital's domestic industry based on Samsung's investments is comprised of the development, readying-for-market, testing, deployment, and support of the Samsung Domestic Industry Products in the United States. Samsung, on information and belief, wholly owns SRA which oversees its own relevant operations in the United States. Ex. 64 (SRA About Webpage).

123. Additionally, SEA conducts significant activities on behalf of SEC in the United States. For example, SEA employs teams of employees who carry out marketing, sales, corporate support, technology, customer solutions, and public affair functions. In particular, SEC identifies SEA as "the Sales and Marketing subsidiary" of SEC which brings "mobile devices, connected appliances, home entertainment, 5G networks and digital solutions to life for people across the nation." Ex. 65 (SEA Careers Webpage). SEC identifies SEA as a major subsidiary, noting that its teams "provide expertise to ensure success across the company." *Id.*

124. SEA generates substantial revenue for SEC. SEA is part of multiple business segments of SEC. For example, SEA publicly states that its sales team is “[f]irst to get their hands on [Samsung’s] new devices,” and “bring[s] [Samsung’s] innovations to the world by driving strong relationships with [its] customers and understanding how [its] technology empowers them.” *Id.* The Technology team “pioneer[s] to impact the globe and introduc[es] groundbreaking technology and solutions to [Samsung’s] customers.” *Id.* The marketing team “bring[s] [Samsung’s] technology to life in the marketplace.” *Id.* And the customer solutions team “ensure[s] that [Samsung’s] customers are cared for and fully empowered, protecting and supporting the invaluable core components of [Samsung’s] brand.” *Id.*

125. SEA’s sales for the 2024 fiscal year were \$29.8 billion, which accounts for 13.5% of SEC’s total revenue of \$220.7 billion for that year. Ex. 66 (SEC 2024 Consolidated Financial Statement) at 7, 22. Similarly, in 2023, SEA recorded \$29.0 billion in sales, which made up 15.3% of SEC’s total revenue of \$190.0 billion. *Id.* at 7, 23. In 2023 and 2024, SEA was among the highest earning subsidiaries listed in SEC’s annual report. *See id.* at 22-23.

126. Given that sales in the Americas constituted approximately 39.5% and 35.6% of Samsung’s worldwide sales in fiscal years 2024 and 2023, respectively, a significant number of Samsung’s overall investments detailed herein are attributable to its operations in the United States. *See id.* at 80. Samsung has also admitted that “[m]any of Samsung Electronics’ products are specifically developed for and tested in the United States.” *See Certain Active Matrix Organic Light-Emitting Diode Display Panels and Modules for Mobile Devices, and Components Thereof*, Inv. No. 337-TA-1351, Amended Complaint (EDIS Doc. ID No. 794839) at ¶ 375 (“1351 Investigation Complaint”).

127. In addition, SRA conducts significant activities on behalf of SEC in the United States. For example, SRA publicly states that it is “[h]eadquartered in Silicon Valley” and is “engaged in researching emerging technology to create new businesses and developing core technology to enhance the competitiveness of Samsung products.” Ex. 67 (SRA LinkedIn Webpage). In particular, SRA states that it is involved in industry and standards, stating “[e]xperts in these areas work for SRA to insure that these technologies are properly standardized and to inform, educate and support partner companies in growth of these new[] ways to be entertained.” Ex. 68 (SRA Digital Media Webpage). SRA’s team “also includes many software engineers building tools to help [SRA] innovate faster and to support use by [SRA’s] partners such as in streaming and HDR creation tools to HDR10+.” *Id.* Moreover, SRA has a Standards and Mobility Innovation Team which it describes as “[l]eading standardization for 5G communication, multimedia, Internet of Things and service.” Ex. 69 (SRA Next Generation Communication Webpage).

128. Research performed by SRA generates substantial revenue for SEC. SEC’s business divisions are organized in a two-pronged framework consisting of finished products and component businesses. Ex. 63 (Samsung Q3 2025 Interim Report) at 5. The finished products business consists of the DX Division, which is responsible for the production and sales of TVs, monitors, refrigerators, washing machines, air conditioners, smartphones, computers, and network systems. *Id.* For the third quarter of 2025, SEC acknowledged that 59.9% of its total revenue came from DX products, including, on information and belief, the Samsung Domestic Industry Products partly designed by SRA. *Id.* at 6. The DX division has a regional headquarters in New Jersey, which, on information and belief, includes SRA. *See id.* at 9.

129. Moreover, SAS conducts significant activities on behalf of SEC in the United States. SEC identifies SAS as a major subsidiary. *Id.* at 49. For the 2024 fiscal year, SAS recorded nearly \$3.7 billion in sales. Ex. 70 (SEC 2024 Consolidated Financial Statement) at 22.

130. Since its inception in 1996, SAS has publicly touted its ties to the Austin, Texas, area, and since that time, it has opened two fabrication plants, an additional expansion, and in 2022, broke ground on a third facility in Taylor, Texas, committing a minimum \$17 billion investment into the facility, which includes buildings, property improvements, machinery, and equipment, and creating an estimated 1,800 direct jobs. Ex. 71 (SAS History Webpage); Ex. 72 (SAS Taylor Webpage).

131. On information and belief, SAS directly manufactures processors and chipsets that are used in the Samsung Domestic Industry Products for AV1 video decoding and HDR technologies. Ex. 73 (Exynos Processor Webpage); Ex. 74 (Exynos 2600 Webpage). On information and belief, the Exynos processors are manufactured in Austin, Texas. *See Certain Semiconductor Devices, Wireless Infrastructure Equipment Containing the Same, and Components Thereof*, Inv. No. 337-TA-1254, Complaint (EDIS Doc. ID No. 732995) at ¶ 59 (“Samsung uses the inventions claimed in the Asserted Patents in the controller chip of the 970 EVO Solid-State Disk (‘SSD’), in the Exynos RF 5510 transceiver chip used in its flagship Galaxy S20 and other mobile devices, and in numerous other semiconductor integrated circuit devices fabricated in Austin at SAS”).

132. In addition to manufacturing the chipsets used in certain of the Samsung Domestic Industry Products, on information and belief, SAS also develops its chipsets in its Central Texas facilities. For example, SAS describes itself as “a foundry focused on developing and producing

world-class products to meet customer demands for technology that fuels our lives.” Ex. 75 (SAS US Fab Webpage).

133. Moreover, research and development activities performed by SAS generate substantial revenue for SEC. For example, SAS hires development engineers that, on information and belief, develop semiconductors which are used in the Samsung Domestic Industry Products. Ex. 76 (SAS Engineer Job Postings).

134. Samsung has spent, and continues to spend, significant sums on domestic facilities and equipment related to the Samsung Domestic Industry Products. In 2023 and 2024, Samsung spent \$42.3 billion and \$37.7 billion, respectively, on the “acquisition of property, plant and equipment.” Ex. 70 (SEC 2024 Consolidated Financial Statement) at 13; *see also* 1351 Investigation Complaint at ¶ 380 (detailing 2021 and 2022 investments). “Many of Samsung Electronics’ products are specifically developed for and tested in the United States.” 1351 Investigation Complaint at ¶ 375. “Samsung Electronics has spent, and continues to spend, significant sums on domestic facilities and equipment related to its Galaxy Products,” and, “[o]n information and belief, a substantial portion of these investments occurred in the United States.” *Id.* at ¶ 380.

135. In particular, SEA is headquartered in Englewood Cliffs, New Jersey and has facilities in Plano, Texas; Mountain View, California; Bellevue, Washington; and Washington, D.C. Ex. 77 (Life at Samsung Webpage). In addition, SRA is headquartered in Mountain View, California and has locations in Berkeley Heights, New Jersey; Cambridge, Massachusetts; Irvine, California; Logan, Utah; New York, New York; Plano, Texas; San Francisco, California; and Valencia, California. Ex. 78 (SRA Locations Webpage). Further, SAS maintains a 2.45 million square-foot facility in Austin, Texas, which is used for manufacturing and research and

development. Ex. 79 (Economic Development Article); Ex. 80 (SAS 2020 Corporate Responsibility Report) at 4. Samsung also announced that it would invest another \$45 billion in Texas, the first phase adding 4.7 million square feet of floor space, a fabrication plant, office space, a parking garage, central utility building, and special utility supply facilities. Ex. 79 (Economic Development Article). Additional plans include a next generation chipmaking plant, fabrication line, and a research and design facility. *Id.*

136. Samsung has spent, and continues to spend, significant sums on domestic labor and capital related to the Samsung Domestic Industry Products. *See* 1351 Investigation at ¶ 386. “For example, in 2020 and 2021, Samsung Electronics spent \$18.45 billion and \$19.58 billion in net R&D investment, respectively. . . [t]he United States accounted for approximately 6.1% and 6.3% of total Samsung Electronics non-current assets in 2020 and 2021, respectively. . . Samsung Electronics thus invested approximately \$1.13 billion and \$1.24 billion in research and development in the United States in 2020 and 2021, respectively.” *Id.* at ¶ 387.

137. Samsung has employees in the United States who work on various activities related to, upon information and belief, the Samsung Domestic Industry Products. Samsung employs more than 260,000 employees worldwide and, on information and belief, more than 20,000 at SEA alone, most, if not all of which, on information and belief, are located in the United States. Ex. 81 (Samsung Fast Facts); Ex. 82 (SEA LinkedIn Webpage).

138. SEA and SRA have made, and continue to make, substantial investments in engineering and research and development activities in Samsung Galaxy smartphones, tablets, and laptops, including, upon information and belief, the Samsung Domestic Industry Products in the United States. For example, Samsung spent \$25.7 billion in R&D costs in 2024, and \$20.8 billion in R&D costs in 2023. Ex. 70 (SEC 2024 Consolidated Financial Statement) at 63. On information

and belief, significant portions of these expenditures are spent on development of the Samsung Domestic Industry Products in the United States. SRA's U.S.-based engineers develop innovations in video technology for Samsung's smartphone, tablet, and other products, including upon information and belief, for the Samsung Domestic Industry Products. Additionally, SEA employs engineering and management teams in the United States responsible for developing, marketing, and selling Samsung tablet, computer, and other devices, including, on information and belief, the Samsung Domestic Industry Products.

139. Further, SRA engineers and other personnel located in the United States are engaged in the planning, development, commercialization, and support for the Samsung Domestic Industry Products. *See, e.g.*, Ex. 83 (SRA Personnel LinkedIn Profiles).

140. Moreover, SEA engineers and other personnel located in the United States are engaged in the planning, development, commercialization, and support for the Samsung Domestic Industry Products. *See, e.g.*, Ex. 84 (SEA Personnel LinkedIn Profiles).

141. Further, SEA invests in U.S.-based personnel who provide technical support, service, warranty, and repair to Samsung customers in the United States who have purchased SEC devices, including, upon information and belief, the Samsung Domestic Industry Products. Ex. 85 (Samsung Care Webpage).

142. On information and belief, Samsung's total allocated expenditures in the United States relating to the Samsung Domestic Industry Products exceed several million dollars.

143. Based on at least the foregoing, Samsung's domestic investments in the Samsung Domestic Industry Products are significant and substantial within the meaning of Section 337 by any reasonable metric, whether viewed quantitatively, qualitatively, or both. A domestic industry therefore exists within the United States based on the activities and investments of InterDigital's

domestic licensee, Samsung. Samsung is expected to provide additional bases and supporting information.

## **2. Domestic Licensee Sony's Domestic Activities and Investments**

144. InterDigital licensed Sony to practice the '846, '784, '877, '962, '168, and '751 Patents, and to design, develop, manufacture, sell and distribute the Sony Domestic Industry Products. Ex. 40.

145. Sony has made, and continues to make, significant and substantial domestic investments within the United States in connection with the protected articles that practice the '846, '784, '877, '962, '168, and '751 Patents. Exhibits 43, 46, 49, 52, 55, and 58 are claim charts demonstrating that each of these patents is practiced by at least one of the Sony Domestic Industry Products.

146. As a result of these investments, a domestic industry as defined by 19 U.S.C. § 1337(a)(3)(A) and (B) exists in the United States with respect to the Sony Domestic Industry Products by virtue of Sony's significant investment in plant and equipment and significant employment of labor and capital within the United States. A domestic industry defined by 19 U.S.C. § 1337(a)(3)(C) exists as well by virtue of Sony's substantial investment in research and development and engineering related to the Sony Domestic Industry Products.

147. Sony's domestic industry consists of its significant and substantial investments in the research, development, engineering, support, readying for market, and post-sale service activities related to its major product lines in the United States. This includes discrete domestic investments in the following product categories: Sony smart televisions and Sony PlayStations.

148. As discussed below, each of these product categories individually evidences a substantial domestic industry under subparts (A), (B), and (C). Sony's digital televisions and gaming systems are among the leading television and gaming brands in the United States. The

Sony Television Domestic Industry Products and Sony PlayStation Domestic Industry Products each undergo substantial investments in the United States in the research, development, testing, and deployment in the United States. Upon information and belief, the investments in plant, equipment, labor, and capital in the activities discussed herein are significant and substantial in both the quantitative and qualitative contexts, whether considered individually or collectively.

149. SCA, located in New York, New York, is the U.S. headquarters of Sony Corp. Ex. 86 (Sony Who We Are Webpage). It maintains a place of business at 25 Madison Avenue, 26th Floor, New York, New York 10010. Ex. 87 (Sony 2024 20-F) at 20. The land for the New York facility comprises nearly 400,000 square meters, including 112,000 square meters of production facilities for Sony's electronic products and 272,000 square meters of office buildings and machinery, along with 4,000 square meters for storing music catalogues. *Id.* at 37; *see also* Ex. 88 (SCA Headquarters STUDIOS Article). SCA's principal U.S. businesses include SEL and SIE, along with Sony Music Entertainment, Sony Music Publishing LLC, and Sony Pictures Entertainment Inc. Ex. 86 (Sony Who We Are Webpage).

150. SEL is headquartered in San Diego, California. *Id.* It is a leading provider of audio and video electronics and information technology products for the consumer and professional markets. Its operations include research and development, engineering, sales, marketing, distribution, and customer service for Sony's television products, including, upon information and belief, the Sony TV Domestic Industry Products. *Id.*

151. SIE is headquartered in San Mateo, California. *Id.*; *see also* Ex. 89 (SIE Global Headquarters Webpage); Ex. 90 (SIE San Mateo Careers Webpage). It undertakes product research, development, design, marketing, sales, production, distribution, and customer service for PlayStation hardware, software, content, and network services, including, upon information and

belief, the Sony PlayStation Domestic Industry Products. Ex. 87 (Sony 2024 20-F) at 21. Its corporate, sales, and marketing teams support SIE's overall business operations and strategies, manage partnerships, and drive innovation across the organization. Ex. 91 (SIE Teams Webpage). This includes departments like finance, legal, human resources, marketing, IT, and communications, who manage essential tasks such as financial planning, regulatory compliance, and brand promotion. *Id.* SIE's engineering and technology teams are responsible for designing and enhancing the user experience across the PlayStation platform, and includes engineers dedicated to UI/UX design, product management, engineering, and customer insights. *Id.* Upon information and belief, these employees perform activities related to the Sony PlayStation DI Products in the United States.

152. Moreover, Sony's digital television and PlayStation products, including the Sony Domestic Industry Products, are warranted against defects in material and workmanship. Ex. 92 (Sony Product Repair – USA Webpage); Ex. 93 (Sony Television Limited Warranty); Ex. 94 (Sony PlayStation Limited Warranty). Upon information and belief, Sony's domestic investments in labor and capital related to the Sony Domestic Industry Products include significant expenditures for the personnel engaged in Sony's repair and warranty support efforts within the United States.

153. Sony reported approximately \$4.2 billion of research and development costs worldwide for the fiscal year ending March 31, 2025, and \$4.3 billion for the fiscal year ending March 31, 2024. Ex. 87 (Sony 2024 20-F) at 56. On information and belief, significant portions of these R&D investments are related to the Sony Domestic Industry Products. For example, for the fiscal year ending March 31, 2025, \$908.5 million, or 21.5%, of Sony's R&D costs were for the Entertainment, Technology & Services ("ET&S") segment, which covers the Sony Television DI

Products, and \$1.8 billion, or 43.2%, were for Game & Network Services (“G&NS”) segment, which covers the Sony PlayStation DI Products. *Id.*

154. Upon information and belief, a significant portion of Sony’s investments in plant and equipment, labor and capital, engineering, and research and development in the United States relate to the Sony Domestic Industry Products. Sony’s sales and revenues for the Sony Domestic Industry Products constitute a significant portion of its total overall sales and revenues. For example, Sony’s television sales totaled \$3.7 billion for the fiscal year ending March 31, 2025, and \$4.1 billion for the fiscal year ending March 31, 2024. Ex. 87 (Sony 2024 20-F) at 44. These figures represent 23.9% and 25.9% of customer sales for Sony’s entire ET&S segment, respectively. Moreover, as of September 30, 2025, more than 84.1 million PlayStation 5 units have been sold worldwide. Ex. 95 (PlayStation Data and Sales). SIE reports that the PlayStation 5 is the most profitable generation to date, accounting for more than \$136 billion in sales and \$13 billion in operating income overall. Ex. 96 (SIE Our Company Webpage). Further, the United States makes up the largest market for Sony’s overall sales and financial services revenue (and approximately 31.9% of the total for the fiscal year ending March 31, 2025 and 28.9% of the total for the fiscal year ending March 31, 2024). Ex. 87 (Sony 2024 20-F) at F-37.

155. On information and belief, Sony’s total allocated expenditures in the United States relating to the Sony Domestic Industry Products exceed several million dollars.

156. Based on at least the foregoing, Sony’s domestic investments in the Sony Domestic Industry Products are significant and substantial within the meaning of Section 337 by any reasonable metric, whether viewed quantitatively, qualitatively, or both. A domestic industry therefore exists within the United States based on the activities and investments of InterDigital’s domestic licensee, Sony.

157. Sony is expected to provide additional bases and supporting information.

### **3. Domestic Licensee LG's Domestic Activities and Investments**

158. InterDigital licensed LG to practice the '846, '784, '877, '962, '168, and '751 Patents, and to design, develop, manufacture, sell and distribute the LG Domestic Industry Products. Ex. 41.

159. LG has made, and continues to make, significant and substantial domestic investments within the United States in connection with the protected articles that practice the '846, '784, '877, '962, '168, and '751 Patents. Exhibits 44, 47, 50, 53, 56, and 59 are claim charts demonstrating that each of these patents is practiced by at least one of the LG Domestic Industry Products.

160. As a result of these investments, a domestic industry as defined by 19 U.S.C. § 1337(a)(3)(A) and (B) exists in the United States with respect to the LG Domestic Industry Products by virtue of LG's significant investment in plant and equipment and significant employment of labor and capital within the United States. A domestic industry defined by 19 U.S.C. § 1337(a)(3)(C) exists as well by virtue of LG's substantial investment in research and development and engineering related to the LG Domestic Industry Products.

161. LG's domestic industry consists of its significant and substantial investments in the research, development, engineering, support, readying for market, and post-sale service activities related to its major product lines in the United States. This includes discrete domestic investments in the following product categories: LG smart televisions and monitors.

162. As discussed below, each of these product categories individually evidences a substantial domestic industry under subparts (A), (B), and (C). LG's televisions undergo substantial investments in the United States by LG in the research, development, testing, deployment in the United States. Upon information and belief, the investments in plant, equipment,

labor, and capital in the activities discussed herein are significant and substantial in both the quantitative and qualitative contexts.

163. LG Electronics is a global innovator in technology and consumer electronics with a presence in almost every country, including the United States, and an international workforce of more than 75,000. Ex. 97 (LG 2025 Financials Press Release). It is a leading manufacturer of consumer and commercial products, such as the LG Domestic Industry Products, and its total global revenue exceeded \$61 billion in 2025—the highest ever for the second consecutive year. *Id.*

164. LG is committed to research and development. In 2024, LG reported \$1.8 billion in research and development expenses. Ex. 99 (LG 2024 Consolidated Financial Statement) at 2. Similarly, in 2023, LG reported \$1.7 billion in research and development expenses. *Id.* Upon information and belief, a significant portion of LG’s overall research and development expenses relate to the LG Domestic Industry Products.

165. LG USA is firmly established as a leader in the home entertainment industry, and its innovative team designs cutting-edge technologies and manufactures home electronics that raise the industry standard. Ex. 98 (LG USA Careers – Home Electronics Webpage). Its major business is classified as the production and sales of electronic products. Ex. 99 (LG 2024 Consolidated Financial Statement) at 13. LG USA is a market leader in important audio and video product categories such as 4K OLED and upper UHD TVs offering superior pictures and sound. Ex. 98 (LG USA Careers – Home Electronics Webpage).

166. LG USA’s headquarters are located in Englewood Cliffs, New Jersey. Ex. 100 (LG Corporate Profile Webpage); Ex. 101 (HOK Project Webpage); *see also* Ex. 102 (LG Electronics North America LinkedIn Webpage). The facility cost \$300 million to build, and LG estimated it would generate \$26 billion annually for the area and create 1,000 permanent jobs. Ex. 103

(Construction Dive Article). The campus has two main buildings covering 350,000 square feet, which are connected by an 18,000 square foot glass atrium. Ex. 104 (Sixteen Nine Article). The North American headquarters features a vast number of LG commercial digital displays installed throughout, dedicated product showrooms for home entertainment products, and a 5,000 square foot interactive, education-focused “LG Innovation Lab” available to local schools. *Id.*

167. LG also maintains a New Jersey Business Innovation Center Showroom in Englewood, New Jersey, a Chicago Business Innovation Center Showroom in Lincolnshire, Illinois, and an Atlanta Business Innovation Center Showroom in Alpharetta, Georgia. Ex. 105 (New Jersey Business Innovation Center Webpage); Ex. 106 (Chicago Business Innovation Center Webpage); Ex. 107 (Atlanta Business Innovation Center Webpage); *see also* Ex. 108 (New Jersey Business Innovation Center Virtual Tour); Ex. 109 (Chicago Business Innovation Center Virtual Tour). These showrooms provide hands-on experiences for consumers to interact with LG’s latest innovations and solutions and to enable consumers to engage with technical experts who provide insights on sales and engineering. Upon information and belief, these showrooms feature LG’s television products, including the LG Domestic Industry Products. *See, e.g.,* Ex. 106 (Chicago Business Innovation Center Webpage) (“Explore 4K OLED TVs, Smart Displays, and other incredible TVs for hotel rooms, cruise cabins, hospitals, fitness areas, and more.”).

168. Zenith Electronics LLC (“Zenith”), located in Lincolnshire, Illinois, has been a wholly owned subsidiary of LG Electronics since 1999. Ex. 110 (Zenith Webpage). It is a leading U.S. technology company, and serves as LG’s U.S. research subsidiary for consumer electronics, hospitality and health care technologies, broadcasting standards, and related technologies. *Id.*

169. Additionally, LG Alabama is LG’s sole customer service division for the North American market. Ex. 111 (Huntsville Chamber Article). Based in Huntsville, Alabama, with

additional locations in Fort Worth, Texas, and Rancho Cucamonga, California, it offers leading technical and customer support, and repair parts distribution for high-end products, including LG's consumer electronics such as the LG Domestic Industry Products. *Id.*

170. Moreover, LG's domestic investments in labor and capital related to the LG Domestic Industry Products include significant expenditures for the personnel engaged in LG's repair and warranty support efforts within the United States. *See* Ex. 112 (LG Service and Repair Webpage); Ex. 113 (LG Warranties). On information and belief, personnel working for or on behalf of LG engage in extensive repair and warranty support activities, including, e.g., for U.S. customers of LG products on-site at LG Authorized Service Centers located throughout the United States. Ex. 114 (LG Authorized Service Centers).

171. Upon information and belief, a significant portion of LG's investments in plant and equipment, labor and capital, engineering, and research and development are in the United States and relate to the LG Domestic Industry Products. LG's sales and revenues in the United States constitute a significant portion of its total overall sales and revenues. For example, LG's total sales worldwide in 2024 reached \$59.7 billion and \$56.0 billion in 2023. Ex. 99 (LG 2024 Consolidated Financial Statement) at 2. Moreover, in 2024, LG USA reported \$10.0 billion in sales, which represents 16.8% of LG's total worldwide sales. *Id.* at 19. And in 2023, LG USA reported \$9.7 billion in sales, which represents 17.4% of LG's total worldwide sales. *Id.* at 20; *see also id.* at 105.

172. Additionally, LG's sales and revenues for the LG Domestic Industry Products constitute a significant portion of its total overall sales and revenues. LG's Home Entertainment ("HE") segment, which is responsible for TVs, had \$10.4 billion in sales worldwide (17.4% of LG's total sales worldwide) for 2024, and \$9.7 billion in sales worldwide (17.3% of LG's total

sales worldwide) for 2023. *Id.* at 49; *see also id.* at 105. In fact, LG has commanded the global OLED TV market for 12 consecutive years. Ex. 115 (LG OLED TV Market Press Release). In 2024, LG led global OLED TV shipments—shipping 3.18 million units and reaching 52.4% market share. *Id.* Its total TV shipments across both OLED and LCD models reached 22.6 million units last year, representing 16.1 percent of global TV market revenue. *Id.* LG’s Business Solutions (“BS”) segment, which is responsible for monitors, PCs, and information displays, had \$3.9 billion in sales worldwide (6.5% of LG’s total sales worldwide) for 2024, and \$3.7 billion in sales worldwide (6.6% of LG’s total sales worldwide) for 2023. Ex. 99 (LG 2024 Consolidated Financial Statement) at 49; *see also id.* at 105.

173. LG has previously been found to have satisfied the economic prong of the domestic industry requirement in an investigation involving digital television patents. *Certain Televisions, Components Thereof and Products Containing Same*, Inv. No. 337-TA-687, Order No. 20 (May 20, 2010) (Commission determining not to review by notice dated June 4, 2010).

174. On information and belief, LG’s total allocated expenditures in the United States relating to the LG Domestic Industry Products exceed several million dollars.

175. Based on at least the foregoing, LG’s domestic investments in the LG Domestic Industry Products are significant and substantial within the meaning of Section 337 by any reasonable metric, whether viewed quantitatively, qualitatively, or both. A domestic industry therefore exists within the United States based on the activities and investments of InterDigital’s domestic licensee, LG.

176. LG is expected to provide additional bases and supporting information.

## **X. RELIEF REQUESTED**

177. WHEREFORE, by reason of the foregoing, Complainants requests that the United States International Trade Commission:

- (a) Institute an investigation pursuant to Section 337 of the Tariff Act of 1930, as amended, 19 U.S.C. § 1337, with respect to the Respondents' violations of Section 337 based on the unlawful and unauthorized importation, sale for importation, and/or sale within the United States after importation, and instruction of purchasers on the infringing use of the Accused Products;
- (b) Schedule and conduct an evidentiary hearing on permanent relief pursuant to 19 U.S.C. § 1337(d) and (f);
- (c) Issue a limited exclusion order specifically directed to each named Respondent and its subsidiaries, predecessors, affiliates, agents, successors, and assigns, pursuant to 19 U.S.C. § 1337(d)(1), barring from entry into the United States all of Respondents' products that infringe, or are manufactured using processes that infringe, directly or indirectly, one or more claims of the Asserted Patents;
- (d) Issue permanent cease and desist orders pursuant to 19 U.S.C. § 1337(f) prohibiting each Respondent from, among other things, importing, selling, offering for sale (including via the Internet or electronic mail), advertising (including via the Internet or electronic mail), distributing, transferring (except for exportation), soliciting United States agents or distributors, and aiding or abetting other entities in the importation, sale for importation, sale after importation, transfer (except for exportation), or distribution of the Accused Products that infringe the Asserted Patents; and
- (e) Impose a bond upon Respondents' importation of infringing Accused Products during the 60-day Presidential review period pursuant to 19 U.S.C. § 1337(j) to

prevent further injury to InterDigital and its licensees' domestic industry relating to each of the Asserted Patents; and

- (f) Issue such other and further relief as the Commission deems just and proper under the law, based upon the facts determined by the investigation and the authority of the Commission.

Dated: February 25, 2026

Respectfully Submitted,

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