

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

**Before The Honorable Monica Bhattacharyya
Administrative Law Judge**

In the Matter of

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

Investigation No. 337-TA-1495

TCL RESPONDENTS' CORRECTED NOTICE OF PRIOR ART

In accordance with the Procedural Schedule (Order No. 9) and Ground Rule No. 5, and consistent with the requirements of 35 U.S.C. § 282, Respondents 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 Ltd., and TTE Technology, Inc. (collectively, “TCL” or the “TCL Respondents”), by counsel, hereby submit their Corrected Notice of Prior Art. The attached charts set forth the prior art relevant to each of the patents asserted by Complainants InterDigital, Inc., InterDigital VC Holdings, Inc., and InterDigital Madison Patent Holdings SAS (collectively, “InterDigital” or “Complainant”) in this Investigation. TCL identifies prior art for the following patents: 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”). The attached charts list the prior art on which TCL may rely, either singly or in any combination, to establish the invalidity of the asserted claims of the Asserted Patents or to demonstrate the relevant state of the art or level of skill in the art.

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The TCL Respondents also give notice that they may rely, either singly or in any combination, on the prior art identified: (i) within the specification and prosecution history of the Asserted Patents; (ii) within the specification and prosecution histories of patents or patent applications that are related or counterparts to the Asserted Patents, including post-grant proceedings such as inter partes reviews; (iii) identified, cited, or relied upon in Hisense's and the TCL Respondents' interrogatory responses, including but not limited to Hisense's and the TCL Respondents' June 29 and August 3, 2026 contention interrogatory responses; (iv) identified, cited, or relied upon by any expert offering an opinion in this Investigation, including in any expert report or testimony offered in this Investigation; and (v) one or more of the references identified in the Hisense Respondents' Notice of Prior Art. Additionally, and for avoidance of any doubt, the TCL Respondents further incorporate by reference in its entirety the Hisense Respondents' Notice of Prior Art.

TCL may also rely on prior art subsequently identified or produced by Complainant or any subpoenaed third parties in this Investigation during the remainder of fact and expert discovery, and prior art admitted into evidence or identified as an exhibit at the hearing or at deposition.

TCL may rely on documents and information that are not prior art, and therefore need not be disclosed in this Notice, for other purposes including, but not limited to, evidence of inherency in any of the prior art or establishing the prior art as prior art, evidence of simultaneous or near-simultaneous invention, and evidence of secondary considerations of nonobviousness, including documents establishing the sales or use dates of prior-art products.

TCL may rely on any person identified as an author or inventor of any prior art identified herein as a prior inventor or as having prior knowledge of, or as having previously used or offered for sale, the alleged inventions of the Asserted Patents. TCL may also rely on individuals whose

names and addresses are within Complainant's possession, including Complainant's employees, former employees, consultants, and/or other persons affiliated with Complainant who may have knowledge of, or may have previously made, used, sold, or offered for sale, the alleged inventions of the Asserted Patents.

TCL may supplement or amend this Notice as discovery proceeds, including during third-party discovery. TCL notes that discovery, including third-party discovery, is ongoing. To date, Complainant has not provided fulsome infringement contentions and claim construction has not been resolved, which limits TCL's ability to understand the scope of potentially relevant prior art. In addition, expert reports have not been exchanged, and expert discovery has not started. TCL may amend and/or supplement this Notice upon written notice and for good cause shown to identify prior-art references that may be discovered after the date of this Notice, to identify additional prior art that may be rendered material based upon positions Complainant or its expert witnesses may adopt in this Investigation, or if Complainant relies on any claims, for any purpose, that have not been identified to date.

DATED: August 8, 2026

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Appendix A

United States Patent No. 8,085,846

PATENTS AND PATENT PUBLICATIONS

Country	Number	Date¹	Title	Inventors/Patentees
Japan	H03-80784 A	Filed Aug. 24, 1989 Published Apr. 5, 1991	Encoder for Television Signal	Kitazato et. al. Sony Corp.
United States	7,474,699 B2	Filed Aug. 28, 2002 Issued Jan. 6, 2009	Moving Picture Encoding/Transmission System, Moving Picture Encoding/Transmission Method, and Encoding Apparatus, Decoding Apparatus, Encoding Method Decoding Method and Program usable for the Same	Kobayashi et. al. NTT DoCoMo, Inc.
United States	5,576,766 A	Filed Oct. 26, 1994 Issued Nov. 19, 1996	Moving Picture Encoder	Matsumoto et. al. KDDI Corp.

¹The dates provided herein are for identification purposes only and are not an admission of the applicable filing date for priority or prior art purposes.

NON-PATENT PUBLICATIONS

Title	Author(s)	Date	Relevant Pages
<i>Backward Adaptive Lossless Compression of Video Sequences, Proc. IEEE ICASSP 2002 ("Carotti")</i>	Carotti et al.	2002	See generally.
<i>Rate-Constrained Multihypothesis Prediction for Motion-Compensated Video Compression, IEEE Trans. Circuits & Sys. for Video Tech., Vol. 12, No. 11 ("Flierl")</i>	Flierl et al.	Nov. 2002	See generally.
<i>JVT-B059, Proposal of Intra Prediction for Improved Macroblock Prediction Modes (VPM2), JVT 2nd Meeting ("JVT-B059")</i>	Hagai et al.	Jan.–Feb. 2002	See generally.
<i>Entropy Measurements for Nonadaptive and Adaptive, Frame-to-Frame, Linear-Predictive Coding of Videotelephone Signals, Bell Sys. Tech. J., Vol. 54, No. 6 ("Haskell")</i>	B.G. Haskell	July–Aug. 1975	pp. 1155–1174.
<i>MPEG-2 Spatial Scalable Coding and Transport Stream Error Concealment for Satellite TV Broadcasting Using Ka-Band, IEEE Trans. Broadcasting, Vol. 44, No. 2 ("Hsu")</i>	Hsu et. al.	June 1998	pp. 233–242.
<i>New Intra Prediction using Intra-Macroblock Motion Compensation, JVT-C151/JVT-C151r1, 3rd JVT Meeting, Fairfax, VA ("JVT-C151")</i>	Yu et. al.	May 6–10, 2002	See generally.
<i>Spatial Temporal Prediction for Video Data Compression, Ch. 3 in Video Data Compression for Multimedia Computing ("Li")</i>	Li et. al.	1997	Chapter 3; see generally.
<i>Spatial-domain resolution-scalable video coding, Proc. SPIE Vol. 2094 (Visual Communications and Image Processing 93) ("Puri")</i>	A. Puri & A. Wong	Oct. 22, 1993	p. 718.

Title	Author(s)	Date	Relevant Pages
<i>H.26L Test Model Long-Term Number 9 (TML-9) draft0, ITU-T SG16 Q.6 Video Coding Experts Group (VCEG), 14th Meeting, Santa Barbara, CA ("TML9")</i>	ITU-T SG16 Q.6 Video Coding Experts Group (VCEG); T. Wiegand	Generated Dec. 21, 2001	See generally.
<i>Core Experiments Description on Improved Macroblock Prediction Modes, ITU-T SG16 Q.6 Video Coding Experts Group (VCEG), 15th Meeting, Pattaya, Thailand ("VCEG-61" / "VCEG-061")</i>	ITU-T SG16 Q.6 Video Coding Experts Group (VCEG); S. Adachi et al.	Dec. 4–6, 2001	See generally.
<i>Spatial Prediction in Scalable Video Coding, IEE Conf. Pub. No. 413, Int'l Broadcasting Convention ("Vincent")</i>	Vincent et. al.	Sept. 14–18, 1995	pp. 244–249.
<i>Working Draft Number 2, Revision 0 (WD-2), JVT-B118, 2nd JVT Meeting, Pattaya, Thailand ("WD2")</i>	Wiegand et. al.	Dec. 3–7, 2001	See generally.
<i>Lossless Video Coding Using Optimal 3D Prediction, Proc. IEEE ICIP 2002, Rochester, NY (Sept. 22-25, 2002)</i>	Brunello et. al.	Sept. 22-25, 2002	See generally.
<i>JV2-E022</i>	Sullivan & Ohm	Oct. 9–17, 2002	See generally.
<i>VCEG-O17</i>	Schwarz & Wiegand	Sept. 24-27, 2001	See generally.
<i>VCEG-O22</i>	Adachi et. Al.	Sept. 24-27, 2001	See generally.
<i>TML9.0 / H.26L reference software</i>	Wiegand & Bjøntegaard	December 2001	See generally.
<i>WD-1; MPEG-4 Part 10</i>	Wiegand et. al.	Jan. 29–Feb. 1, 2002	See generally.
<i>JVT-B011</i>	Peter List	Jan. 29–Feb. 1, 2002	See generally.

Title	Author(s)	Date	Relevant Pages
<i>JVT-B036</i>	Lowell Winger	Jan. 29–Feb. 1, 2002	See generally.
<i>JVT-B055</i>	Ragip Kurceren	Jan. 29–Feb. 1, 2002	See generally.
<i>JVT-B080</i>	Suzuki et. al.	Jan. 29–Feb. 1, 2002	See generally.
<i>JVT-B071</i>	Karczewicz & Lainema	Jan. 29–Feb. 1, 2002	See generally.
<i>JVT-B101</i>	Schwarz et. al.	Jan. 29–Feb. 1, 2002	See generally.
<i>JVT-B042</i>	Miska M. Hannuksela	Jan. 29–Feb. 1, 2002	See generally.
<i>JVT-B029</i>	Kerofsky & Sun	Jan. 29–Feb. 1, 2002	See generally.
<i>JVT-B063</i>	Bjøntegaard & Sivertsen	Jan. 29–Feb. 1, 2002	See generally.
<i>JVT-B038</i>	Hallapuro et. al.	Jan. 29–Feb. 1, 2002	See generally.
<i>JVT-B022</i>	Park et. al.	Jan. 29–Feb. 1, 2002	See generally.
<i>JVT-B102</i>	Stockhammer et. al.	Jan. 29–Feb. 1, 2002	See generally.

Appendix B
United States Patent No. 9,294,784
PATENTS AND PATENT PUBLICATIONS

United States	2009/0257670 A1	Filed Apr. 9, 2008 Published Oct. 15, 2009	In-loop adaptive wiener filter for video coding and decoding	Chiu and Xu Intel Corp
United States	2003/0053708 A1	Filed Jul. 2, 2001 Published Mar. 20, 2003	Removal of block encoding artifacts	Kryukov et. al.
United States	2005/0100236 A1	Filed Oct. 14, 2004 Published May 12, 2005	System and method for classifying pixels in images	Kong et. al. Mitsubishi Electric Research Laboratories Inc.
United States	2006/0171466 A1	Filed Mar. 22, 2005 Published Aug. 3, 2006	Method and system for mosquito noise reduction	Schoner and Neuman Avago Technologies Sales Pte. Ltd.
United States	2004/0161035 A1	Filed Feb. 9, 2002 Published Aug. 19, 2004	Device for interpolating of scanning values and image encoder and decoder	Wedi Robert Bosch GmbH

United States	2010/0128803	Filed Jun. 3, 2008 Published May 27, 2010	Methods and apparatus for in-loop de-artifacting filtering based on multi-lattice sparsity-based filtering	Escoda and Yin InterDigital Madison Patent Holdings SAS
WO (PCT)	2001/54415 A1	Filed Jan. 22, 2001 Published Jul. 26, 2001	A Method and Associated Device for Filtering Digital Video Images	Aksu et. al. Nokia Oyj

NON-PATENT PUBLICATIONS

Title	Author(s)	Date	Relevant Page(s)
<i>Overview of the H.264/AVC Video Coding Standard, IEEE Transactions on Circuits and Systems for Video Technology, Vol. 13, No. 7 ("Wiegand")</i>	T. Wiegand et al.	July 2003	See generally.
<i>Edge Map Guided Adaptive Post-Filter for Blocking and Ringing Artifacts Removal, MERL A Mitsubishi Electric Research Laboratory ("Kong-NPL") (republished as Edge Map Guided Adaptive Post-Filter for Blocking and Ringing Artifacts Removal", IEEE International Symposium on Circuits and Systems (ISCAS), May 2004)</i>	Hao-Song Kong, Anthony Vetro, and Huifang Sun	Feb. 2004	See generally.

Appendix C

United States Patent No. 10,250,877 **PATENTS AND PATENT PUBLICATIONS**

Country	Number	Date²	Title	Inventors/Patentees
United States	5,805,222 A	Filed Nov. 4, 1996 Issued Sept. 8, 1998	Video coding apparatus	Nakagawa et. al. Fujitsu Ltd.
United States	2004/0150747 A1	Filed Sept. 26, 2003 Published Aug. 5, 2004	HDTV downconversion system	Sita
United States	6,628,714 B1	Filed Dec. 15, 1999 Published Aug. 5, 2004 Issued Sept. 30, 2003	Down converting MPEG encoded high definition sequences to lower resolution with reduced memory in decoder loop	Fimoff et. al. Zenith Electronics LLC
China	103262532 A	Filed Jul. 19, 2011 Published Aug. 21, 2013	Enhancement method for sample multiplexed image and video data	阿萨纳西奥斯 et. al.
United States	2010/0226437 A1	Filed Mar. 6, 2009 Published Sep. 9, 2010	Reduced-resolution decoding of avc bit streams for transcoding or display at lower resolution	Robertson and Liu Sony Corp., Sony Electronics Inc.

² The dates provided herein are for identification purposes only and are not an admission of the applicable filing date for priority or prior art purposes.

NON-PATENT PUBLICATIONS

Title	Author(s)	Date	Relevant Pages
<i>JCTVC-E603, WD3: Working Draft 3 of High-Efficiency Video Coding, JCT-VC 5th Meeting, Geneva, Mar. 16-23, 2011 (“Wiegand” / “WD3”); Wiegand JCTVC-E603 (“HEVC WD3”)</i>	Wiegand et al.	Mar. 16-23, 2011	See generally.
<i>Digital Signal Processing — Chapter 9: Multirate Digital Signal Processing (“Chapter 9” / “Newcastle”)</i>	University of Newcastle upon Tyne	Sept. 24, 2001	Chapter 9; see generally.
<i>Video coding for low bit rate communication (“ITU-T H.263” / “H263-Annex”)</i>	International Telecommunication Union, Telecommunication Standardization Sector	02/98; approved Feb. 6, 1998	See generally.
<i>Resolution Switching for Coding Efficiency and Resilience, JCT-VC 6th Meeting, Turin, Italy (“Davies-F158” / “Davies”)</i>	T. Davies	July 14–22, 2011	See generally.
<i>Multidimensional Digital Signal Processing (“Dudgeon”)</i>	Dan E. Dudgeon et al.	1984	See generally.

Appendix D

United States Patent No. 11,695,962

PATENTS AND PATENT PUBLICATIONS

Country	Number	Date³	Title	Inventors/Patentees
Japan	2013-192118 A	Filed Mar. 14, 2012 Published Sep. 26, 2013	Arithmetic decoder, image decoder, arithmetic encoder, and image encoder	Tsukuba et. al. Sharp Corp.
United States	2019/0124340 A1	Filed Nov. 21, 2017 Published Apr. 25, 2019	Context modeling for intra-prediction modes	Young and He Google LLC
United States	2013/0177070 A1	Filed Jan. 10, 2013 Published Jul. 11, 2013	Significance map support for parallel transform coefficient processing in video coding	Seregin et. al. Qualcomm Inc.

³ The dates provided herein are for identification purposes only and are not an admission of the applicable filing date for priority or prior art purposes.

NON-PATENT PUBLICATIONS

Title	Author(s)	Date	Relevant Pages
<i>JCTVC-G1015, AHG5/AHG6: A combined proposal from JCTVC-G366, JCTVC-G657, and JCTVC-G768 on context reduction of significance map coding with CABAC' (7th JCT-VC Meeting, Geneva, Nov. 2011) ("G1015")</i>	Auyeung	Nov. 2011	See generally.
<i>Alliance for Open Media AV1 Version 1.0.0 with Errata 1 ("AV1 Specification"; identified by InterDigital as "S1" and the "AV1 Protocol")</i>	Alliance for Open Media	Jan. 8, 2019	See generally.
<i>High Efficiency Video Coding (Recommendation ITU-T H.265 International Standard ISO/IEC 23008-2) ("HEVC")</i>	ITU-T SG 16 Q.6 (VCEG) and ISO/IEC JTC 1/SC 29/WG 11 (MPEG)	Apr. 2013; Oct. 2014	See generally.
<i>JVET-C1001, Algorithm Description of Joint Exploration Test Model 3, 3rd JVET Meeting, Geneva, May 26 – June 1, 2016 ("JEM3")</i>	Chen et al.	May 26–June 1, 2016	See generally.
AV1/libaom reference-codec source code, de4a693d	Alliance for Open Media	2017-11-21 16:22:06	See generally (https://aomedia.googlesource.com/aom/+/de4a693d7718ad0826dcda294349b7ee178c95c1).
AV1/libaom reference-codec source code, a0367dc1	Alliance for Open Media	2017-11-22 23:33:14	See generally (https://aomedia.googlesource.com/aom/+/a0367dc1d8dff9e041f3b59753b0d3ec6672095a).

AV1/libaom reference-codec source code, 0c9ea803	Alliance for Open Media	2017-11-20 16:14:15	See generally (https://aomedia.googlesource.com/aom/+0c9ea803df7d768558b1d1d27f2eb774eb238377).
AV1/libaom reference-codec source code, 3bac9928	Alliance for Open Media	2017-11-02 15:02:28	See generally (https://aomedia.googlesource.com/aom/+3bac9928bc9820aae9ca947370a2f1d78c5a39a4).
AV1/libaom reference-codec source code, e775b8b	Alliance for Open Media	2017-11-01 03:30:02	See generally (https://aomedia.googlesource.com/aom/+c9c78b500d1947ca3608daddf492e5c71f45c7967).
AV1/libaom reference-codec source code, c9c78b5	Alliance for Open Media	2017-11-23 04:49:52	See generally (https://aomedia.googlesource.com/aom/+c9c78b500d1947ca3608daddf492e5c71f45c7967).
AV1/libaom reference-codec source code, cf85d5c8	Alliance for Open Media	2017-08-23 18:15:10	See generally (https://aomedia.googlesource.com/aom/+cf85d5c89d93341a8a75091ebf2c4768c2f77d62).
AV1/libaom reference-codec source code, a47cd6c0	Alliance for Open Media	2017-08-23 18:15:10	See generally (https://aomedia.googlesource.com/aom/+a47cd6c08fb2328125f156440b7004abff691a3f).

PRIOR PUBLIC USES AND SYSTEMS

System / Repository	Version / Commit	Date	Location
AV1/libaom reference-codec source code	de4a693d	2017-11-21 16:22:06	https://aomedia.googlesource.com/aom/+/de4a693d7718ad0826dcda294349b7ee178c95c1
AV1/libaom reference-codec source code	a0367dc1	2017-11-22 23:33:14	https://aomedia.googlesource.com/aom/+/a0367dc1d8dff9e041f3b59753b0d3ec6672095a
AV1/libaom reference-codec source code	0c9ea803	2017-11-20 16:14:15	https://aomedia.googlesource.com/aom/+/0c9ea803df7d768558b1d1d27f2eb774eb238377
AV1/libaom reference-codec source code	3bac9928	2017-11-02 15:02:28	https://aomedia.googlesource.com/aom/+/3bac9928bc9820aae9ca947370a2f1d78c5a39a4
AV1/libaom reference-codec source code	e775b8b	2017-11-01 03:30:02	https://aomedia.googlesource.com/aom/+/e775b8bc623ff837951469f5dd1eadb482e440db
AV1/libaom reference-codec source code	c9c78b5	2017-11-23 04:49:52	https://aomedia.googlesource.com/aom/+/c9c78b500d1947ca3608dadf492e5c71f45c7967
AV1/libaom reference-codec source code	cf85d5c8	2017-08-23 18:15:10	https://aomedia.googlesource.com/aom/+/cf85d5c89d93341a8a75091ebf2c4768c2f77d62
AV1/libaom reference-codec source code	a47cd6c0	2017-10-24 14:52:49	https://aomedia.googlesource.com/aom/+/a47cd6c08fb2328125f156440b7004abff691a3f

Appendix E

United States Patent No. 11,399,168 PATENTS AND PATENT PUBLICATIONS

Country	Number	Date ⁴	Title	Inventors/Patentees
United States	2007/0268411 A1	Filed Sept. 29, 2005 Published Nov. 22, 2007	Method and Apparatus for Color Decision Metadata Generation	Rehm et. al. InterDigital CE Patent Holdings SAS

NON-PATENT PUBLICATIONS

Title	Author(s)	Date	Relevant Pages
<i>ICC.1:2004-10 (ICC Profile Format Specification, v4.2.0.0) (“ICC”)</i>	Not separately stated; the reference is identified as “ICC.”	2004-10	See generally; profile-header fields at Bytes 12–23.

⁴ The dates provided herein are for identification purposes only and are not an admission of the applicable filing date for priority or prior art purposes.

Appendix F

United States Patent No. 9,654,751

PATENTS AND PATENT PUBLICATIONS

Country	Number	Date⁵	Title	Inventors/Patentees
Japan	2002-354443 A	Filed May 24, 2001 Published Dec. 6, 2002	Video distribution system, video distribution method	Watanabe et. al. Hitachi Kokusai Electric Inc. Kokusai Denki Electric Inc.
United States	2008/0144711 A1	Filed Dec. 15, 2006 Published Jun. 19, 2008	Encoding video at multiple resolution levels	Chui and Wang Precoad Inc.

⁵ The dates provided herein are for identification purposes only and are not an admission of the applicable filing date for priority or prior art purposes.

CERTIFICATE OF SERVICE

I, Elizabeth Cummings, hereby certify that on August 8, 2026, a copy of the foregoing was served upon the following as indicated:

The Honorable Lisa R. Barton Secretary to the Commission U.S. INTERNATIONAL TRADE COMMISSION 500 E Street, SW, Suite 112-A Washington, DC 20436	☒ VIA EDIS
The Honorable Monica Bhattacharyya Administrative Law Judge U.S. INTERNATIONAL TRADE COMMISSION 500 E Street, S.W. Room 317 Washington, D.C. 20436 Bhattacharyya337@usitc.gov	☒ VIA Electronic Mail
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