

Pursuant to the First Amended Docket Control Order entered July 13, 2017 (Dkt No. 91), Plaintiff Nichia Corporation (“Nichia” or “Plaintiff”) and Defendants Lowe’s Home Centers, LLC, L G Sourcing, Inc., Feit Electric Company, Inc., and VIZIO, Inc. (collectively, “Defendants”) hereby respectfully submit their Patent Rule 4-5(d) Joint Claim Construction Chart.¹

A chart comparing the parties’ respective proposed constructions is attached herewith as Exhibit A; a separate listing of the complete language of the disputed claims with disputed terms emphasized in bold type is attached herewith as Exhibit B. Due to the length of the disputed claims, and the multiple disputed limitations within each of those claims, the parties believe that this format will be most helpful to the Court in tracking and resolving the various claim construction issues presented in this case.

As set forth in Exhibit A, the parties have agreed to the construction of 13 terms, and will notify the Court promptly regarding any additional agreed constructions reached prior to or after the claim construction hearing scheduled for March 13, 2018.

DATED: January 8, 2018

<p>Respectfully submitted,</p> <p><u>/s/ Robert P. Parker</u> ROTHWELL, FIGG, ERNST & MANBECK, P.C. Robert P. Parker Martin M. Zoltick Steven P. Weihrouch Jenny L. Colgate Michael H. Jones Daniel McCallum Nechama E. Potasnick Mark T. Rawls 607 14th Street, N.W. – Suite 800 Washington, D.C. 20005 Tel: (202) 783-6040 Fax: (202) 783-6031</p>	<p>Respectfully submitted,</p> <p><u>/s/Scott D. Stimpson</u> SILLS CUMMIS & GROSS P.C Trent S. Dickey (Pro Hac Vice) Scott D. Stimpson (Pro Hac Vice) Tod M. Melgar (Pro Hac Vice) 101 Park Avenue, 28th Floor New York, New York 10178 Tel. (212) 500-1550 Fax (212) 643-6500 Email: tdickey@sillscummis.com Email: sstimpson@sillscummis.com Email: tmelgar@sillscummis.com</p> <p>Jerry R. Selinger State Bar No. 18008250</p>
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¹ Defendants respectfully continue to maintain that venue is improper for the reasons set forth in the various motions to dismiss and/or transfer venue, and Defendants’ compliance with the Court’s Docket Control Order (Dkt 91) is not a waiver of those objections

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) this 8th day of January, 2018.

/s/Nasri V. B. Hage

Nasri V. B. Hage

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