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21 BELL NORTHERN RESEARCH, LLC

22 **IN THE UNITED STATES DISTRICT COURT**
23 **SOUTHERN DISTRICT OF CALIFORNIA**

24 BELL NORTHERN RESEARCH,
25 LLC,

26 Plaintiff,

27 v.

28 LG ELECTRONICS, INC., LG
ELECTRONICS U.S.A. INC., and LG
ELECTRONICS MOBILE
RESEARCH U.S.A., LLC,

Defendants.

C.A. No. 3:18-CV-02864-CAB-BLM

BELL NORTHERN RESEARCH,
LLC'S PATENT L.R. 3.1
DISCLOSURE OF ASSERTED
CLAIMS AND INFRINGEMENT
CONTENTIONS

1 Pursuant to Patent L.R. 3.1 and the Court’s Case Management Order, Plaintiff
2 Bell Northern Research, LLC (“BNR”) hereby provides its Disclosure of Asserted
3 Claims and Infringement Contentions, including the claim charts attached as Exhibits
4 A-H and all Annexes thereto. This disclosure is made solely for the purpose of the
5 above-captioned action, with respect to above-named Defendants.

6 Discovery in this matter is in progress and BNR’s investigation of Defendants’
7 infringement is ongoing. For example, Defendants have not yet produced any
8 documents relating to the accused products; nor have they provided any deposition
9 testimony in this action. This disclosure is therefore based upon information that BNR
10 has been able to obtain publicly, together with BNR’s current good faith beliefs
11 regarding the Accused Instrumentalities in this matter. For example, the figures shown
12 in the accompanying claim charts, including but not limited to those depicting the
13 location of and identifying the presence of claim elements in the Accused
14 Instrumentalities, are illustrative and may change after production and review of
15 Defendants’ confidential information. Accordingly, BNR explicitly reserves the right
16 to amend and/or supplement the accompanying claim charts regarding direct and/or
17 indirect infringement, as well as literal infringement and/or infringement under the
18 doctrine of equivalents based on evidence uncovered in this litigation.

19 The claim charts attached as exhibits hereto are not designed to represent the
20 entire scope of infringement of the Accused Instrumentalities, but are merely to
21 illustrate examples of how the Accused Instrumentalities infringe the Asserted Claims
22 of the Patents-in-Suit. Further, the division of claim elements in the charts attached as
23 exhibits hereto is provided solely for purposes of convenience in presenting BNR’s
24 Infringement Contentions. The division is not meant to modify the claim language or
25 to inform claim construction.

26 The following disclosures should not be construed as BNR’s proposed
27 construction of any asserted claim or claim term. This disclosure does not represent
28 BNR’s position on whether any claim term should be or needs to be construed,

1 clarified, or interpreted by the Court. Further, these disclosures also are based at least
2 in part on BNR's present understanding of the meaning and scope of the asserted
3 claims of the patents-in-suit in the absence of claim construction proceedings for all
4 the patents-in-suit or substantial discovery in this matter. BNR reserves the right to
5 supplement or amend these disclosures if its understanding of the claim terms changes,
6 including if the Court construes them.

7 This disclosure is given without prejudice to BNR's rights, and BNR hereby
8 expressly reserves its rights under the Patent Local Rules or any other applicable basis
9 to further supplement or amend its contentions, including without limitation, to add
10 Asserted Claims or Accused Instrumentalities as additional facts are ascertained,
11 analyses are made, research is completed, contentions are made, claims are construed,
12 and Defendants' confidential information is received and reviewed in discovery.

13 **a. Asserted Claims (Patent L.R. 3.1(a)):**

14 Based on information presently available, BNR asserts that each of the
15 following claims is infringed by Defendants. In accordance with the Court's
16 instructions with regard to related cases pending in this District, BNR has limited its
17 assertions to no more than seven claims per patent. BNR expressly reserves the right to
18 modify, substitute, change, or amend which claims it asserts against Defendants as
19 more information becomes available, including without limitation the parties' claim
20 construction positions and the Court's claim construction rulings.

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U.S. Patent No.	Asserted Claims
7,945,285 ("285 Patent")	1, 2, 3, 4
6,549,792 ("792 Patent")	1, 2, 4, 6, 9, 14, 15
7,990,842 ("842 Patent")	1, 3, 4, 8, 11, 14, 19
6,941,156 ("156 Patent")	1
8,416,862 ("862 Patent")	9, 10, 11, 12
7,957,450 ("450 Patent")	2, 3, 11, 12, 13, 21, 22

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1 8,792,432 (“432 Patent”) 9, 12

2 7,039,435 (“435 Patent”) 1, 2, 3, 6, 8

3 **b. Accused Instrumentalities (L.P.R. 3.1(b)):**

4 Based on information presently available, BNR identifies the Accused
5 Instrumentalities below. Defendants infringe the Asserted Claims pursuant to § 271(a)
6 by making, using, importing, selling, and/or offering to sell in the United States
7 without authority these Accused Instrumentalities, and/or § 271(g) by offering to sell,
8 selling, and/or using within the United States a product made by a process patented in
9 the United States. The particular acts constituting infringement by Defendants’ accused
10 instrumentalities are detailed in the claim charts attached herewith as Exhibits A - D.
11 BNR reserves the right to amend or add additional Accused Instrumentalities to these
12 Contentions, if warranted and/or based on further investigation and discovery.
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Asserted Claim	Accused Instrumentalities
’285 Patent	
1	G7 ThinQ, Aristo 3, Fiesta 2, Fortune 2, G Flex, G6, G6+, G8 ThinQ, Harmony 2, K30, K8, K8 V, Phoenix 4, Phoenix 4 Plus, Q6, Q7+, Stylo 3+/Titanium, Stylo 4, Stylo 4+/Plus, V30, V30+, V35 ThinQ, V40 ThinQ, X Charge, X Venture, Zone 4
2	G7 ThinQ, Aristo 3, Fortune 2, G Flex, G6, G6+, G8 ThinQ, Harmony 2, K30, K8, K8 V, Phoenix 4, Phoenix 4 Plus, Q6, Q7+, Stylo 3+/Titanium, Stylo 4, Stylo 4+/Plus, V30, V30+, V35 ThinQ, V40 ThinQ, X Charge, X Venture, Zone 4
3	G7 ThinQ, Aristo 3, Fortune 2, G6, G6+, G8 ThinQ, Harmony 2, K30, K8, K8 V, Phoenix 4, Phoenix 4 Plus, Q6, Q7+, Stylo 3+/Titanium, Stylo 4, Stylo 4+/Plus, V30, V30+, V35 ThinQ, V40 ThinQ, X Charge, X Venture, Zone 4
4	G7 ThinQ, Aristo 3, Fortune 2, G Flex, G6, G6+, G8 ThinQ, Harmony 2, K30, K8, K8 V, Phoenix 4, Phoenix 4 Plus, Q6, Q7+, Stylo 3+/Titanium, Stylo 4, Stylo 4+/Plus, V30, V30+, V35 ThinQ, V40 ThinQ, X Charge, X Venture, Zone 4
’792 Patent	

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