

UNITED STATES INTERNATIONAL TRADE COMMISSION
WASHINGTON, D.C.

Before the Honorable Cameron R. Elliot
Administrative Law Judge

In the Matter of

Certain Electronic Devices, Including
Streaming Players, Televisions, Set
Top Boxes, Remote Controllers, and
Components Thereof

Investigation No. 337-TA-1200

JOINT CLAIM CONSTRUCTION CHART

Pursuant to Order No. 8, Complainant Universal Electronics Inc. (“UEI” or “Complainant”), and Respondents (i) Roku, Inc., (“Roku”); (ii) TCL Electronics Holdings Limited, Shenzhen TCL New Technology Company Limited, TCL King Electrical Appliances (Huizhou) Company Limited, TTE Technology Inc., TCL Corp., TCL Moka, Int’l Ltd., TCL Overseas Marketing Ltd., and TCL Industries Holdings, Co., Ltd., and TCL Smart Device (Vietnam) Company, Ltd. (collectively, “TCL”); (iii) Hisense Co., Ltd., Hisense Electronics Manufacturing Company of America Corporation, Hisense Import & Export Co. Ltd., Qingdao Hisense Electric Co., Ltd., and Hisense International (HK) Co., Ltd. (collectively, “Hisense”); and (iv) Funai Electric Company, Ltd., Funai Corporation, and Funai (Thailand) Co., Ltd. (collectively, “Funai”) by and through their undersigned attorneys, respectfully submit the following Joint Claim Construction Chart.

Pursuant to Ground Rule 6, the chart attached hereto as Exhibit A identifies the agreed-upon constructions for the terms from U.S. Patent Nos. 7,589,642 (“the ’642 Patent”) and 9,911,325 (“the ’325 Patent”) (collectively, “the Mui Patents”) and 10,593,196 (“the ’196 Patent”) and 9,716,853 (“the ’853 Patent”) (collectively, “the Arling Patents”). The chart attached hereto

as Exhibit B identifies each party's proposed constructions of the disputed terms for the Mui Patents, and U.S. Pat. Nos. 10,600,317 ("the '317 Patent") and 7,969,514 ("the 514 Patent") (collectively, "the Haughawout Patents").

Dated: August 10, 2020

Respectfully submitted,

| | |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p><u>/s/ Matthew J. Rizzolo</u> Matthew J. Rizzolo Brendan McLaughlin ROPES & GRAY LLP 2099 Pennsylvania Ave NW Washington, DC 20006 Telephone: (202) 508-4600 Facsimile: (202) 508-4650 Email: matthew.rizzolo@ropesgray.com Email: RopesITC-1200@ropesgray.com</p> <p>Andrew Thomases ROPES & GRAY LLP 1900 University Avenue, 6th Floor East Palo Alto, CA 94303 Telephone: (650) 617-4000 Facsimile: (650) 617-4090</p> <p>Mathew R. Shapiro ROPES & GRAY LLP 1211 Avenue of the Americas New York, NY 10036-8704 Telephone: (212) 596-9000 Facsimile: (212) 596-9090</p> <p>Jonathan D. Baker Craig Y. Allison DICKINSON WRIGHT RLLP 800 West California Ave, Suite 110 Sunnyvale, CA 95086 Telephone: (408) 701-6200 Facsimile: (844) 670-6009</p> <p>Steven Daniels Michael D. Saunders DICKINSON WRIGHT PLLC 8607 W. 3rd Street, Suite 2500 Austin, TX 78701</p> | <p><u>/s/ Adam D. Swain</u> Adam D. Swain Thomas W. Davison Brian Hill ALSTON & BIRD LLP 950 F Street NW Washington, DC 20004 Telephone: (202) 239-3622 Facsimile: (202) 654-4842</p> <p>Ryan W. Koppelman Katherine Rubschlager ALSTON & BIRD LLP 950 Page Mill Road Palo Alto, CA 94304 Telephone: (650) 838-2000 Facsimile: (65) 838-2001</p> <p>Stephen R. Lareau ALSTON & BIRD LLP 101 South Tryon Street, Suite 4000 Charlotte, NC 28280-4000 Telephone: (704) 444-1000 Facsimile: (704) 444-1111</p> <p>Nic Tsui ALSTON & BIRD LLP 1201 W. Peachtree St., Suite 4900 Atlanta, GA 30309-3424 Telephone: (404) 881-7000 Facsimile: (404) 881-7777</p> <p>Evan W. Woolley ALSTON & BIRD LLP 333 South Hope Street, 16th Floor Los Angeles, CA 90071 Telephone: (213) 576-1000 Facsimile: (213) 576-1100</p> |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

| | |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------|
| <p>Telephone: (512) 770-4200 Facsimile: (844) 670-6009</p> <p>Franklin M. Smith DICKINSON WRIGHT PLLC 2600 W. Big Beaver Rd., Suite 300 Troy, MI 48084 Telephone: (248) 433-7393 Facsimile: (844) 670-6009</p> <p>Caleb Green DICKINSON WRIGHT PLLC 3883 Howard Hughes Pkwy., Suite 800 Las Vegas, NV 89169 Telephone: (702) 550-4417 Facsimile: (844) 670-6009</p> <p>Evi S. Li DICKINSON WRIGHT PLLC 1825 Eye St. NW, Suite 900 Washington, DC 20006 Telephone: (202) 659-6965 Facsimile: (844) 670-6009</p> <p><i>Counsel for Respondent Roku, Inc.</i></p> | <p>Counsel for Complainant Universal Electronics Inc.</p> |
| <p><u>/s/ Jordan L. Coyle</u> Jordan L. Coyle ORRICK HERRINGTON & SUTCLIFFE LLP 1152 15th Street, N.W. Washington, D.C. 20005 Telephone: (202) 339-8400 Facsimile: (202) 339-8500</p> <p><i>Counsel for Respondents Hisense Co. Ltd.; Hisense Electronics Manufacturing Company of America Corporation d/b/a Hisense USA; Hisense Import & Export Co. Ltd.; Qingdao Hisense Electric Co., Ltd.; Hisense International (HK) Co., Ltd.; Funai Electric Co., Ltd.; Funai Corporation Inc.; and Funai (Thailand) Co., Ltd.</i></p> | |

/s/ John P. Schnurer

John P. Schnurer

Yun Lu

PERKINS COIE LLP

11452 El Camino Real, Suite 300

San Diego, CA 92130

Telephone: (858) 720-5700

Facsimile: (858) 720-5799

Counsel for Respondents

*TCL Electronics Holdings Limited, f/k/a TCL
Multimedia Holdings Limited; Shenzhen TCL
New Technology Company; TCL King
Electrical Appliances (Huizhou) Company
Limited; TTE Technology Inc. d/b/a/ TCL
USA and TCL North America; TCL Corp.;
TCL Moka, Int'l Ltd.; TCL Overseas
Marketing Ltd.; TCL Industries Holdings Co.,
Ltd.; TCL Smart Device (Vietnam) Company,
Ltd.*

EXHIBIT A:
Agreed Upon Claim Terms

| Mui Patents ('642 and '325 Patents) | | |
|------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------|
| Claim Term | Asserted Claims | Agreed Upon Construction |
| “key code” | '642 Patent, Claims 1, 2, 3-6, 12, 14, 19, 20, 22-25 '325 Patent, Claims 1, 4, 5, 7, 9, 12, 15-16 | “a code corresponding to the function of an electronic control including timing information” |
| “keystroke indicator signal” / “keystroke indicator” | '642 Patent, Claims 1, 2, 5, 7, 20; '325 Patent, Claims 1, 9 | “a signal, distinct from a key code, corresponding to a control control]” |

| Arling Patents ('196 and '853 Patents)¹ | | |
|-------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Claim Term | Asserted Claims | Agreed Upon Construction |
| “for use in controlling each of at least a first functional operation and a second functional operation of the intended target appliance” | '853 Patent, Claim 1 | “for use in controlling each of at least a first functional operation of the intended target appliance <u>communication method and second communication method controlling the same first functional operation and the same second functional operation of the same intended target appliance.</u> ” |

¹ The '196 and '853 Patents have not been asserted against the TCL, Hisense, and Funai Respondents, and, accordingly, the construction of the terms of those patents.

Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.