

**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,

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<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>	

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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 function of the 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 and a second functional operation of the intended target appliance <u>communication method and second communication method</u> <u>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.

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