

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

LARGAN PRECISION CO., LTD.,

Plaintiff,

v.

ABILITY OPTO-ELECTRONICS
TECHNOLOGY CO., LTD.;
NEWMAX TECHNOLOGY CO., LTD.;
AND HP INC.,

Defendants.

Case No. 4:19-cv-696-ALM

JURY TRIAL DEMANDED

PLAINTIFF LARGAN PRECISION CO., LTD.'S
PATENT RULE 3-1 AND 3-2 DISCLOSURES

Pursuant to Patent Rule 3-1 and 3-2, Plaintiff Largan Precision Co. Ltd. (“Largan”) hereby submits its Disclosure of Asserted Claims and Infringement Contentions and accompanying disclosure against defendants Ability Opto-Electronics Technology Co., Ltd. (“AOET”), Newmax Technology Co., Ltd. (“Newmax”), and HP Inc. (“HP”) (collectively, “Defendants”).

1. Identification of Asserted Claims

Based on the information presently available, Largan hereby discloses, pursuant to P.R. 3-1(a), the claims of each patent-in-suit that it contends are infringed by Defendants as follows:

United States Patent No. 7,274,518: Claims 1-2, 4-5, and 8-12

United States Patent No. 8,395,691: Claims 21-27

United States Patent No. 8,988,796: Claims 1-4, 6-9, 11, 15-22, and 24-25

United States Patent No. 9,146,378: Claims 1-6, 8, 9, 11, 13, and 15

Largan expressly reserves the right to modify, amend, and/or supplement the foregoing in light of the discovery that Defendants produce, none of which has been provided at present, and/or based on the Court's claim construction.

2. Identification of Accused Products

Based on the information presently available, Largan hereby discloses, pursuant to P.R. 3-1(b), the following accused apparatuses, products, devices, processes, methods, acts or other instrumentalities of which it is currently aware and that it contends infringe, either directly, indirectly, contributorily, or by inducement, the asserted claims of the patents-in-suit: HP Elite X2 1013 G3; HP Envy x360 13 series; HP Spectre Folio; Products using HP Part 928088-001, including but not limited to HP ChromeBook X360 11 G1 series, HP ChromeBook 11 G1 series, and HP Promo G1 series; Products using HP Part 933520-001, including but not limited to HP Envy X360 15 series and HP Envy 15 series; Products using HP Part 940626-001, including but not limited to HP Omen X 17 series; Products using HP Part 919579-006, including but not limited to HP Omen 17 series; Products using HP Part 923692-001, including but not limited to HP Pavilion 14M-BA X360 series, HP Pavilion 14T-BA X360 series, and HP Pavilion 14-BA X360 series; HP Pavilion X360 14M series; EliteBook 1050 G1; Products using HP Part 833962-005, including but not limited to HP Envy NoteBook 15 series, HP Envy X360 Convertible 15 series, HP Envy X360 series, HP Envy X360 M6 series, HP NoteBook 14 series, HP Omen NoteBook 15 series, HP Pavilion 13 series, and HP Pavilion NoteBook 15 series; Products using HP Part 919573-009, including but not limited to HP Omen NoteBook 15 series, and HP Omen 15 series; Products using HP Part L43801-001, including but not limited to HP ProBook X360 11 G3 series; Products using HP Part 912367-001, including but not limited to HP 11 G1 EE

series and HP ProBook X360 11 G1 series; Products using HP Part L13676-001, including but not limited to HP EliteBook 735 G5 series, HP EliteBook 830 G5 series, HP EliteBook 836 G5 series, and HP Skyfire series; Products using HP Part L15509-001, including but not limited to HP EliteBook 840 G5 series, HP EliteBook 846 G5 series, HP EliteBook 850 G4 series, HP ZBook 14u series, HP ZBook 15 series, HP IHC 850 series, HP Infineon 840 series, and HP Sligro Standard series; Products using HP Part L32739-001, including but not limited to HP ZBook 17 G5 series; Products using HP Part L32741-001, including but not limited to HP ZBook 15 G5; Products using HP Part L30660-001, including but not limited to HP ZBook Studio G5 series, HP ZBook Studio X360 series, HP EliteBook 1050 G1 series, HP ZBook S360 G5 series, and HP ZigZag series; Products using HP Part L28404-001, including but not limited to HP EliteBook 745 G5 series, HP EliteBook 755 G5 series, and HP MT44 series; Products using HP Part L03250-001, including but not limited to HP IDS DSC series, HP IDS UMA series, and HP ZBook x2 G4 series; Products using HP Part 919573-008, including but not limited to HP Omen 17 series; Products using HP Part 924478-001, including but not limited to HP Pavilion x360 Convertible 15 series; Products using HP Part 902256-001, including but not limited to HP X2 210 G2 series, HP 210 x5 series, and HP IDS UMA x5 series; Products using HP Part L31350-001, including but not limited to HP Elite X2 series; Products using HP Part 833962-011, including but not limited to HP Pavilion 15 series, HP Pavilion Gaming 15 series, and HP Pavilion 17 series; Products using HP Part 857441-001, including but not limited to HP Envy 15 series, HP Envy NoteBook 15 series, HP NoteBook 14 series, HP NoteBook 15 series, HP Pavilion NoteBook 14 series, HP Pavilion NoteBook 15 series, and HP Pavilion X360 Pavilion Convertible 11 series; Products using HP Part 924842-001, including but not limited to HP Spectre X2 series; Products using HP Part 919573-006, including but not limited to HP

Pavilion Power 15 series; Products using HP Part L31348-001, including but not limited to HP Elite X2 series; Products using HP Part 924841-001, including but not limited to HP Spectre X2 series; Products using HP Part 918906-001, including but not limited to HP 612 series, HP IDS series, HP Promo series, HP Pro X2 series, HP RCTO series, and HP X2 series; Products using HP Part 938114-001, including but not limited to HP 1012 series, HP Elite X2 series, HP IDS series, HP Promo 1012 series, and HP RCTO series; Products using HP Part L13677-001, including but not limited to HP EliteBook 735 G5 series, HP EliteBook 830 G5 series, HP EliteBook 840 G5 series, HP EliteBook 850 G5 series, ZBook 14u G5 series, ZBook 15u G5 series, HP Sligro series, and HP WK Everyday series; Products using HP Part L51916-001, including but not limited to HP ChromeBook 11 A G6 series, and HP IDS UMA series; Products using HP Part L32378-001, including but not limited to HP Siemens ZBook series, and HP ZBook 17 G5 series; Products using HP Part L52572-001, including but not limited to HP ChromeBook 11 G7 series, and HP IDS UMA series; Products using HP Part L58702-001, including but not limited to HP 640 G5 series, HP 650 G5 series, HP ProBook 640 G series, HP ProBook 640 G5 series, and HP ProBook 650 G5 series; Products using HP Part L17986-001, including but not limited to HP EliteBook 840r G4 series; Products using HP Part L28470-001, including but not limited to HP EliteBook 1050 G1 series, HP IDS DSC series, HP ZBook Studio 360 G5 series, and HP ZBook Studio G5 series; Products using HP Part L01065-001 series, including but not limited to HP IDS DSC Series, HP IDS UMA series, HP ProBook 430 G5 series, HP ProBook 440 G5 series, HP ProBook 450 G5 series, HP ProBook 455 G5 series, HP ProBook 470 G5 series, HP RCTO UMA series, HP Z66 Pro G1 series, and HP mt21 series; Products using HP Part L28261-001, including but not limited to HP ProBook 360 440 G1 series; and Products using HP Part L32740-001, including but not limited to HP ZBook 15 G5

series (collectively, the “Accused Products”). Each of the foregoing Accused Products is also identified in the claim charts attached as Exhibits A1, B1, C1-C6, and D1.

In addition, Largan asserts that various other consumer electronic products, including notebook computers, laptop computers, tablets, webcams, and scanners with lenses incorporated therein, made, used, sold, offered for sale and/or imported by Defendants infringe the asserted claims of the patents-in-suit in the same or substantially similar manner (including, but not limited to, by incorporating the same lenses therein), and expects that information regarding these products will be revealed during discovery. Also, upon information and belief, the lenses and lens components incorporated within the identified Accused Products are supplied by AOET and/or Newmax. The specific identification of suppliers and supplier information, however, is within the possession of Defendants, and will be revealed during discovery. Largan expressly reserves the right to modify, amend, or supplement the foregoing list of accused apparatuses in light of the discovery that Defendants produce, none of which has been provided at present, and/or based on the Court’s claim construction.

3. Claim Charts

Pursuant to P.R. 3-1(c), Largan attaches hereto the following exhibits identifying in chart form where each element of each asserted claim is found within the accused instrumentalities identified above: Exhibit A1 (’518 Patent), Exhibit B1 (’691 Patent), Exhibits C1-C6 (’796 Patent), and Exhibit D1 (’378 Patent).

Largan expressly reserves the right to modify, amend, or supplement the foregoing claim charts in light of the discovery that Defendants produce, none of which has been provided at present, and/or based on the Court’s claim construction.

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