
From: Canavera, Kyle (Perkins Coie) <KCanavera@perkinscoie.com>
Sent: Friday, July 17, 2020 1:20 PM
To: Marc Lorelli
Cc: John P. Rondini; ANCC0119L@brookskushman.com; Schnurer, John P. (Perkins Coie); Lu, Yun (Louise) (Perkins Coie)
Subject: RE: CC Chart
Attachments: [DRAFT] 2020-07-XX Joint Claim Construction and Prehearing Statement.DOCX

Hi Marc,

We don't have any edits to the charts. In the statement, we filled in the bit about the most significant terms (highlighted in yellow). If you have any further edits to the statement doc, then please let us know. But I signed the current version, so feel free to file if no further changes on your end.

Thanks,

Kyle

Kyle R. Canavera

D. +1.858.720.5782

E. KCanavera@perkinscoie.com

From: Marc Lorelli <mlorelli@brookskushman.com>
Sent: 17 July, 2020 05:44
To: Canavera, Kyle Ryan (SDO) <KCanavera@perkinscoie.com>
Cc: John P. Rondini <jrondini@brookskushman.com>; ANCC0119L@brookskushman.com; Schnurer, John P. (SDO) <JSchnurer@perkinscoie.com>; Lu, Yun (Louise) (SHA) <LLu@perkinscoie.com>
Subject: CC Chart

Kyle –

Please review the attached. For the statement please make any edits you desire and place your signature block on the document and return to us for consideration. If you have any edits on the charts, please let us know.

Thanks, Marc

NOTICE: This communication may contain privileged or other confidential information. If you have received it in error, please advise the sender by reply email and immediately delete the message and any attachments without copying or disclosing the contents. Thank you.

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Mobile Communication Co., Ltd., and
Shenzhen TCL Creative Cloud
Technology Co., Ltd.*

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

ANCORA TECHNOLOGIES,
INC.

Plaintiff,

v.

TCT MOBILE (US) INC.,
HUIZHOU TCL MOBILE
COMMUNICATION CO.,
LTD., and SHENZHEN TCL
CREATIVE CLOUD
TECHNOLOGY CO., LTD.,

Defendants.

**Case No. 8:19-cv-02192-GW-ASx
(LEAD CASE)**

Consolidated Case No.:
Case No. 2:20-cv-01252-GW-ASx

[Hon. George H. Wu]

**JOINT CLAIM CONSTRUCTION
AND PREHEARING STATEMENT
PURSUANT TO LOCAL PATENT
RULE 4-3**

Plaintiff Ancora Technologies and defendant TCT Mobile (US) Inc., Huizhou TCL Mobile Communications Co., Ltd., and Shenzhen TCL Creative Cloud Technology Co., Ltd. submit this Joint Claim Construction and Prehearing Statement.

Attached hereto as Exhibit A is a table setting forth the claim terms/phrases for which the parties have agreed on construction.

Attached hereto as Exhibit B is a table setting forth the claim terms/phrases that are disputed and therefore request that the Court construe, along with the intrinsic and extrinsic evidence on which the parties currently intend to rely upon.

The parties have narrowed the terms in dispute to the seven terms that the parties believe will be most significant to this case, in accordance with the Court's Scheduling Order (Dkt. No. 34). Subject to further investigation by the parties, only the five terms impacting independent claim 1 have the potential to be case dispositive.

The parties anticipate that the length of time necessary for the Claim Construction Hearing will be two hours.

Neither party proposes to call any live witnesses at the Claim Construction Hearing.

Neither party requests specific factual findings from the Court outside of the Claim Construction decision.

Date: _____

BROOKS KUSHMAN P.C.

/s/
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