

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

<b>JAPAN DISPLAY INC., PANASONIC LIQUID CRYSTAL DISPLAY CO., LTD.,</b>	§	
	§	<b>C.A. NO. 2:20-cv-00283-JRG</b>
<b>Plaintiffs,</b>	§	<b>[LEAD CASE]</b>
	§	
v.	§	<b>C.A. NO. 2:20-cv-00284-JRG</b>
	§	<b>C.A. NO. 2:20-cv-00285-JRG</b>
<b>TIANMA MICROELECTRONICS CO. LTD.,</b>	§	<b>[MEMBER CASES]</b>
	§	
<b>Defendant.</b>	§	<b>JURY TRIAL DEMANDED</b>
	§	
	§	

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**P.R. 4-3 JOINT CLAIM CONSTRUCTION AND PREHEARING STATEMENT**

Pursuant to P.R. 4-3 and the Court’s Docket Control Order (Dkt. No. 34), Plaintiffs Japan Display Inc. and Panasonic Liquid Crystal Display Co., Ltd. (together, “Plaintiffs”) and Defendant Tianma Microelectronics Co. Ltd. (“Defendant”) (collectively, the “Parties”) file this joint claim construction and prehearing statement.

Pursuant to P.R. 4-3(a), the parties provide the following:

**1. The construction of those claim terms, phrases, or clauses on which the parties agree.**

The Parties have agreed on the construction of the following term in U.S. Patent No. 7,636,142:

Term	Agreed Construction
“disclination” (claim 3)	a phenomenon in which the direction of rotation of liquid crystal molecules changes depending on their location

2. **Each party's proposed claim construction or indefiniteness position for each disputed claim term, phrase, or clause, together with an identification of all references from the specification or prosecution history that support that position, and an identification of any extrinsic evidence known to the party on which it intends to rely either to support its position or to oppose any other party's position, including, but not limited to, as permitted by law, dictionary definitions, citations to learned treatises and prior art, and testimony of percipient and expert witnesses.**

Plaintiffs' identification of proposed constructions and supporting evidence is attached hereto as Exhibit A.

Defendant's identification of proposed constructions and supporting evidence is attached hereto as Exhibit B.

3. **The anticipated length of time necessary for the Claim Construction Hearing.**

The Parties anticipate three (3) hours as the total length of time necessary for the Claim Construction Hearing, which is currently set for August 11, 2021 at 9:00 a.m. in Marshall, Texas.

4. **Whether any party proposes to call one or more witnesses, including experts, at the Claim Construction Hearing.**

At this time, the Parties do not intend to call any witnesses at the Claim Construction Hearing.

5. **A list of any other issues which might appropriately be taken up at a prehearing conference prior to the Claim Construction Hearing, and proposed dates, if not previously set, for any such prehearing conference.**

At this time, the Parties have no issues that might appropriately be taken up at a prehearing conference prior to the Claim Construction Hearing.

Dated: May 26, 2021

Respectfully submitted,

/s/ Eric J. Klein

Eric J. Klein

Lead Attorney

Texas Bar No. 24041258

Jeffrey R. Swigart

Texas Bar No. 24102553

VINSON & ELKINS L.L.P.

/s/ James R. Barney

James R. Barney (pro hac vice)

james.barney@finnegan.com

Qingyu Yin (pro hac vice)

qingyu.yin@finnegan.com

Aidan C. Skoyles (pro hac vice)

aidan.skoyles@finnegan.com

2001 Ross Avenue, Suite 3900  
Dallas, TX 75201  
Telephone: (210) 220-7700  
Facsimile: (210) 220-7716  
Email: [eklein@velaw.com](mailto:eklein@velaw.com)  
Email: [jswigart@velaw.com](mailto:jswigart@velaw.com)

Hilary L. Preston  
Texas State Bar No. 24062946  
Jeffrey T. Han  
Texas Bar No. 24069870  
Erik Shallman  
Texas State Bar No. 24113474  
Matthew J. Melançon  
Texas Bar No. 24109544  
**VINSON & ELKINS L.L.P.**  
2801 Via Fortuna, Suite 100  
Austin, TX 78746  
Telephone: (512) 542-8400  
Facsimile: (512) 542-8612  
Email: [hpreston@velaw.com](mailto:hpreston@velaw.com)  
Email: [jhan@velaw.com](mailto:jhan@velaw.com)  
Email: [eshallman@velaw.com](mailto:eshallman@velaw.com)  
Email: [mmelancon@velaw.com](mailto:mmelancon@velaw.com)

Abigail Lubow  
California State Bar No. 314396  
**VINSON & ELKINS L.L.P.**  
555 Mission Street, Suite 2000  
San Francisco, CA 94105  
94105 Telephone: (415) 979-6963  
Facsimile: (415) 358-5770  
Email: [alubow@velaw.com](mailto:alubow@velaw.com)

**COUNSEL FOR PLAINTIFFS  
JAPAN DISPLAY INC. and  
PANASONIC LIQUID CRYSTAL  
DISPLAY CO., LTD.**

FINNEGAN LLP  
901 New York Avenue N.W.  
Washington, DC 20001  
Telephone: 202-408-4000  
Facsimile: 202-408-4400

Eric H. Findlay  
State Bar No. 00789886  
Brian Craft  
State Bar No. 04972020  
FINDLAY CRAFT, P.C.  
102 N. College Ave., Ste. 900  
Tyler, TX 75702  
(903) 534-1100 Telephone  
(903) 534-1137 Facsimile  
[efindlay@findlaycraft.com](mailto:efindlay@findlaycraft.com)  
[bcraft@findlaycraft.com](mailto:bcraft@findlaycraft.com)

*Attorneys for Defendant  
Tianma Microelectronics, Co. Ltd.*

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document was filed electronically in compliance with Local Rule CV-5 on May 26, 2021. As of this date all counsel of record have consented to electronic service and are being served with a copy of this document through the Court's CM/ECF system under Local Rule CV-5(a)(3)(A).

/s/ Eric J. Klein  
Eric J. Klein

# EXHIBIT A

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