

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

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

PLAINTIFFS’ SECOND ELECTION OF ASSERTED CLAIMS

Pursuant to the Court’s Order dated November 18, 2021 (Dkt. No. 202) (“Order”), plaintiffs Japan Display Inc. and Panasonic Liquid Crystal Display Co., Ltd. elect the following claims:

Case	Patent No.	Asserted Claims
-283	<i>8,218,119</i>	1, 3, 5, 8-10
	<i>9,793,299</i>	6, 7, 16
	<i>8,218,118</i>	1, 5
	<i>7,936,429</i>	5
-284	<i>8,830,409</i>	1, 2, 4, 7
-285	<i>7,636,142</i>	-
	<i>7,385,665</i>	1, 3
	<i>9,939,698</i>	1, 4

Plaintiffs do not currently assert claims from the ’142 patent based solely on compliance with the Order. Plaintiffs, however, intend to seek reconsideration of the Order and reserve the right to amend this election to assert claims 1 and 6 of the ’142 patent should the Court modify its Order. If Plaintiffs are allowed to assert claims 1 and 6 of the ’142 patent, Plaintiffs would drop two claims from the remaining asserted patents to keep the total asserted claims at 20.

Dated: November 22, 2021

Respectfully served,

/s/ Eric J. Klein

Eric J. Klein
Lead Attorney
Texas State Bar No. 24041258
Jeffrey R. Swigart
Texas Bar No. 24102553
VINSON & ELKINS L.L.P.
2001 Ross Avenue, Suite 3900
Dallas, TX 75201
Telephone: (214) 220-7700
Facsimile: (214) 220-7716
Email: eklein@velaw.com
Email: jswigart@velaw.com

Hilary L. Preston
Texas State Bar No. 24062946
Jeffrey T. Han
Texas State Bar No. 24069870
Erik Shallman
Texas State Bar No. 24113474
Corbin J. Cessna
Texas State Bar No. 24120753
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
Email: jhan@velaw.com
Email: eshallman@velaw.com
Email: ccessna@velaw.com

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

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

CERTIFICATE OF SERVICE

I hereby certify that on November 22, 2021, a true and correct copy of the foregoing document was served on all counsel for Defendant via electronic mail.

/s/ Erik Shallman

Erik Shallman