

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

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

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
Email: 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
Email: jhan@velaw.com
Email: eshallman@velaw.com
Email: 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

**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
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

Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.