

**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
	§	
	§	

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

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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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