

# EXHIBIT 1011

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

LG Electronics Inc.,

Plaintiff,

v.

TCL Electronics Holdings Ltd. (f/k/a TCL Multimedia Technology Holdings, Ltd.); TCL Industries Holdings Co., Ltd.; TCL Industries Holdings (H.K.) Limited; TTE Technology, Inc. (d/b/a TCL North America); TTE Corporation; TCL Moka International Limited; TCL Moka Manufacturing S.A. de C.V.; TCL King Electrical Appliances (Huizhou) Co. Ltd.; Manufacturas Avanzadas S.A. de C.V.; TCL Smart Device (Vietnam) Co., Ltd.; Shenzhen TCL New Technology Co., Ltd.; TCL Optoelectronics Technology (Huizhou) Co., Ltd.; TCL Overseas Marketing Ltd.; and TCL Technology Group Corporation (f/k/a TCL Corp.),

Defendants.

Civil Action No. 2:22-cv-00122

**PLAINTIFF LG ELECTRONICS  
INC.'S PATENT L.R. 3-1 AND 3-2  
DISCLOSURE OF ASSERTED  
CLAIMS AND INFRINGEMENT  
CONTENTIONS**

**PLAINTIFF'S LOCAL PATENT RULES 3-1 AND 3-2 DISCLOSURES**

Plaintiff LG Electronics Inc. (hereinafter, "LGE" or "Plaintiff"), pursuant to Local Patent Rule 3-1 and Local Patent Rule 3-2 and the Scheduling Orders entered in this case (Dkt. No. 41), submits its Disclosure of Asserted Claims, Infringement Contentions, and contentions regarding LGE products, as well as the required document production with respect to Defendants TCL Electronics Holdings Ltd. (f/k/a TCL Multimedia Technology Holdings, Ltd.); TCL Industries Holdings Co., Ltd.; TCL Industries Holdings (H.K.) Limited; TTE Technology, Inc. (d/b/a TCL North America); TTE Corporation; TCL Moka International Limited; TCL Moka Manufacturing S.A. de C.V.; TCL King Electrical Appliances (Huizhou) Co. Ltd.; Manufacturas Avanzadas S.A.

de C.V.; TCL Smart Device (Vietnam) Co., Ltd.; Shenzhen TCL New Technology Co., Ltd.; TCL Optoelectronics Technology (Huizhou) Co., Ltd.; TCL Overseas Marketing Ltd.; and TCL Technology Group Corporation (f/k/a TCL Corp.) (collectively “TCL” or “Defendants”).

## **I. INTRODUCTION**

Based on LGE’s review of publicly available information and an analysis of Defendants’ accused systems and methods, LGE presents these Infringement Contentions. In making these disclosures and preliminary infringement contentions, LGE notes that it has not yet received any discovery from any Defendant regarding their accused products, or their methods and systems. Accordingly, all information contained in this Disclosure and accompanying Exhibits is the result of publicly available information and independent examination and analysis of the accused instrumentalities of each Defendant. Certain information about the operation of such accused instrumentalities is not available without engaging in further discovery.

Accordingly, LGE reserves the right to modify, amend, and/or supplement any of its Disclosures of Asserted Claims and Infringement Contentions to the extent permitted by the Federal Rules of Civil Procedure, the Local Patent Rules of this Court, and any Order of this Court. LGE specifically reserves the right to modify, amend, and/or supplement any of its identification of asserted claims and/or infringement contentions due not only to discovery obtained from any Defendants, but also discovery obtained from any third parties, voluntary disclosures by any Defendants or third parties, any of Defendants’ contentions and pleadings/briefs/declarations (and exhibits thereto), the issuance of a claim construction ruling by the Court, or for any other reason permitted under the Federal Rules of Civil Procedure and/or the Local Patent Rules of this Court and/or any Order of this Court.

## **II. LOCAL PATENT RULE 3-1 DISCLOSURES AND CONTENTIONS**

### **A. CLAIMS INFRINGED (Local Patent Rule 3-1(a))**

Pursuant to Local Patent Rule 3-1(a), LGE identifies the following patents (hereinafter, the “Patents-in-Suit”) and the following claims of the Patents-in-Suit (hereinafter, “Asserted Claims”) that the Defendants have infringed and continue to infringe:

<b>U.S. Patent No.</b>	<b>Title</b>	<b>Asserted Claims</b>
7,982,803 (the “’803 patent”)	Audio and Video Synchronizing Apparatus and Method	1, 2, 6-10, 13, 14, 16
7,839,452 (the “’452 patent”)	Image Display Device in Digital TV	1-3, 5-17, 19-21, 23
10,334,311 (the “’311 patent”)	Method of Providing External Device List and Image Display Device	1, 3, 4, 5, 7, 9, 10, 11, 12, 14, 15, 16, 18, 20, 21
9,080,740 (the “’740 patent”)	Planar Lighting Device	1-3, 7-29, 31
9,788,346 (the “’346 patent”)	Channel Access Method for Very High Throughput (VHT) Wireless Local Access Network System and Station Supporting the Channel Access Method	9-10, 12-14, 16
10,499,431 (the “’431 patent”)	Channel Access Method for Very High Throughput (VHT) Wireless Local Access Network System and Station Supporting the Channel Access Method	1-2, 4-5, 7-8, 10-11, 13-16

### **B. ACCUSED INSTRUMENTALITIES (Local Patent Rule 3-1(b))**

#### **1. U.S. Patent No. 7,982,803**

For U.S. Patent No. 7,982,803, the Accused Instrumentalities include TCL televisions that include an infringing audio passthrough feature, including but not limited to the TCL model numbers identified in the chart below. Each of the Accused Instrumentalities identified in the chart below infringes claims 1, 2, 6-10, 13, 14, and 16 of the ’803 patent, as explained in more detail in

LGE's Patent L.R. 3-1(c) Disclosures and attached claims charts. LGE also accuses all other TCL televisions (made, used, sold, imported, or offered for sale by or for TCL during the damages period for the '803 patent) that are insubstantially different (or which have substantially the same structure and/or operation and achieve substantially the same function and/or result), with respect to the asserted claims of the '803 patent, from any of the TCL model televisions set forth below.

Series	Model(s)
3-Series	32S331; 32S335
4-Series	43S435; 50S435; 55S435; 65S435; 75S435; 85S435; 43S431; 50S431; 55S431; 65S431; 75S431; 43S433; 75S433; 43S455; 55S455; 65S455; 75S455; 50S455; 55S21
5-Series	55S531; 65S531; 50S535; 55S535; 65S535; 75S535
6-Series	55R635; 65R635; 75R635; 65R648; 75R648
7-Series	85R745

## 2. U.S. Patent No. 7,839,452

For U.S. Patent No. 7,839,452, each of the Accused Instrumentalities identified in Chart 452A below infringes claims 1-3, 5, 7, 9-12, 14, 16, 17, 19-21, and 23 of the '452 patent, and each of the Accused Instrumentalities identified in Chart 452B below infringes claims 6, 8, 13, and 15 of the '452 patent. The Accused Instrumentalities include all TCL televisions that include the infringing 4K upscaling operation, including but not limited to the TCL model numbers identified in the chart below. The infringement of claims 1-3, 5-17, 19-21, and 23 of the '452 patent is

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