

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

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.
TCL Technology Group Corporation (f/k/a TCL Corp.),
Petitioners,

v.

LG Electronics Inc.,
Patent Owner.

Case No. IPR2023-00240
Patent No. 7,982,803

PATENT OWNER'S PRELIMINARY RESPONSE

TABLE OF CONTENTS

I.	INTRODUCTION	1
II.	BACKGROUND	2
	A. Overview of the '803 Patent.....	2
	B. Challenged Claims	4
III.	LEVEL OF SKILL IN THE ART	7
IV.	CLAIM CONSTRUCTION	8
V.	SUMMARY OF THE PRIOR ART REFERENCE (BOUDREAU).....	10
VI.	THE PETITION DOES NOT ESTABLISH A REASONABLE LIKELIHOOD OF SUCCESS	13
	A. Legal Standard.....	13
	B. Petitioner fails to establish that all elements of the challenged claims can be found in Boudreau	14
	1. Petitioner's reliance on Boudreau's "related content" (e.g., audio for the doll) is incorrect	14
	2. Petitioner fails to establish a reasonable likelihood that Boudreau discloses "a switching unit selecting paths for the video signal that is input to the video signal processing unit.".....	17
VII.	CONCLUSION.....	18

TABLE OF AUTHORITIES

Page(s)

CASES

Personal Web Technologies, LLC v. Apple, Inc.,
848 F.3d 987 (Fed. Cir. 2017) 14

STATUTES

35 U.S.C. § 102 13, 14
35 U.S.C. § 103 4, 13, 14
35 U.S.C. § 314(a) 13

I. INTRODUCTION

The inventions disclosed in the '803 Patent are not at all like the cited prior art (U.S. Patent Publication 2004/00117858, "Boudreau") (EX1003), and Petitioner fails to establish otherwise. While the '803 Patent is directed to the synchronization of the audio and video for content being displayed on a television, Boudreau's disclosure relates to manipulation of an entirely separate audio signal. More specifically, Boudreau describes its invention as a multi-device system involving a television and a separate device (a doll), which can be used to supplement a television program by coordinating the television's audio and video with the doll's audio. EX1003, ¶0016. Controlling the processing for the main television audio (as in the '803 Patent) is not equivalent to processing separate audio for a doll.

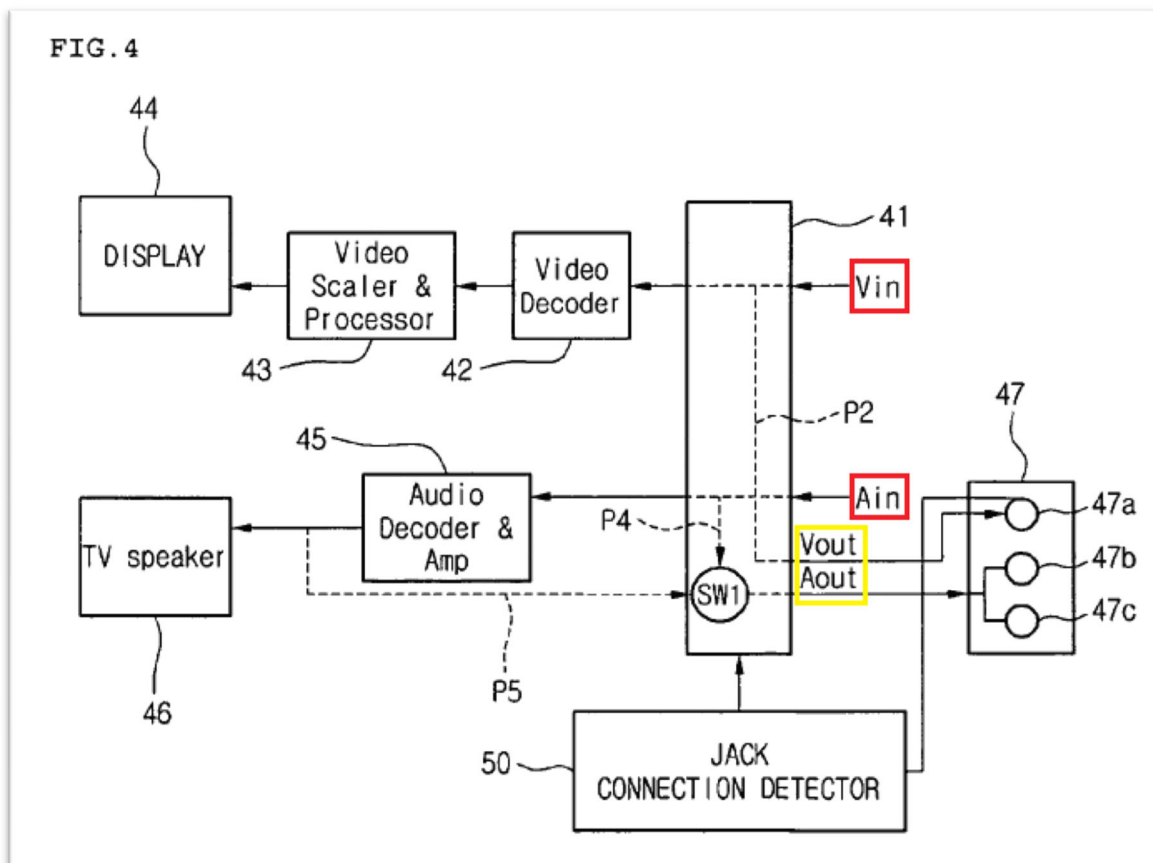
Petitioner muddles this distinction and builds its arguments on top of an unsupported assumption that the doll's audio and the television's audio in Boudreau can be relied upon interchangeably. Petitioner's attempt to map these two distinct and separate audio signals (the doll's audio and the television's audio) to the single audio signal claimed in the '803 Patent should be rejected. Further, because the audio signal that Petitioner maps in Boudreau is handled separately from the television video, Petitioner has failed to show that Boudreau discloses the claimed "switching unit," which selects a path for both the video signal and the audio signal. Patent Owner therefore respectfully requests that the Board deny institution of the

Petition.

II. BACKGROUND

A. Overview of the '803 Patent

The '803 Patent is directed to an apparatus and methods for synchronizing audio and video signals that are input to a digital television, particularly in scenarios where one or both of the audio and video signals are subsequently routed out of the television to an external device. EX1001, 1:12-23, FIG. 4 (annotated and reproduced below) (illustrating audio input and video input in red boxes and audio output and video output in a yellow box).



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.