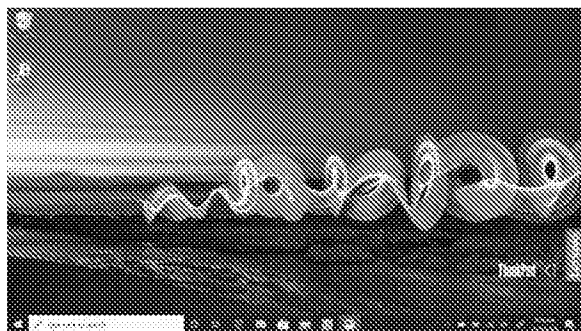


283. The Accused Portable Products (e.g., the 3rd Generation ThinkPad X1 Yoga) include a view selector component configured to transition between the plurality of views in response to activation. For example, when powered on the 3rd Generation ThinkPad X1 Yoga is configured to transition between a laptop mode and a tablet mode:



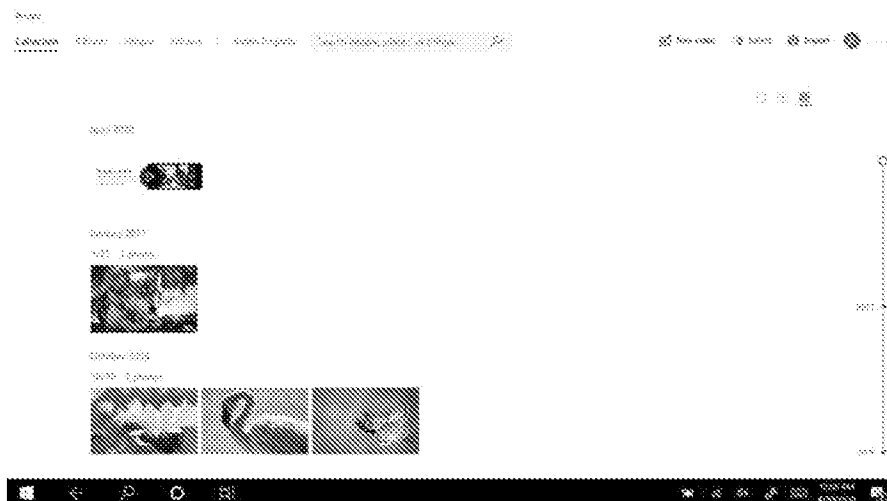
Laptop Mode



Tablet Mode

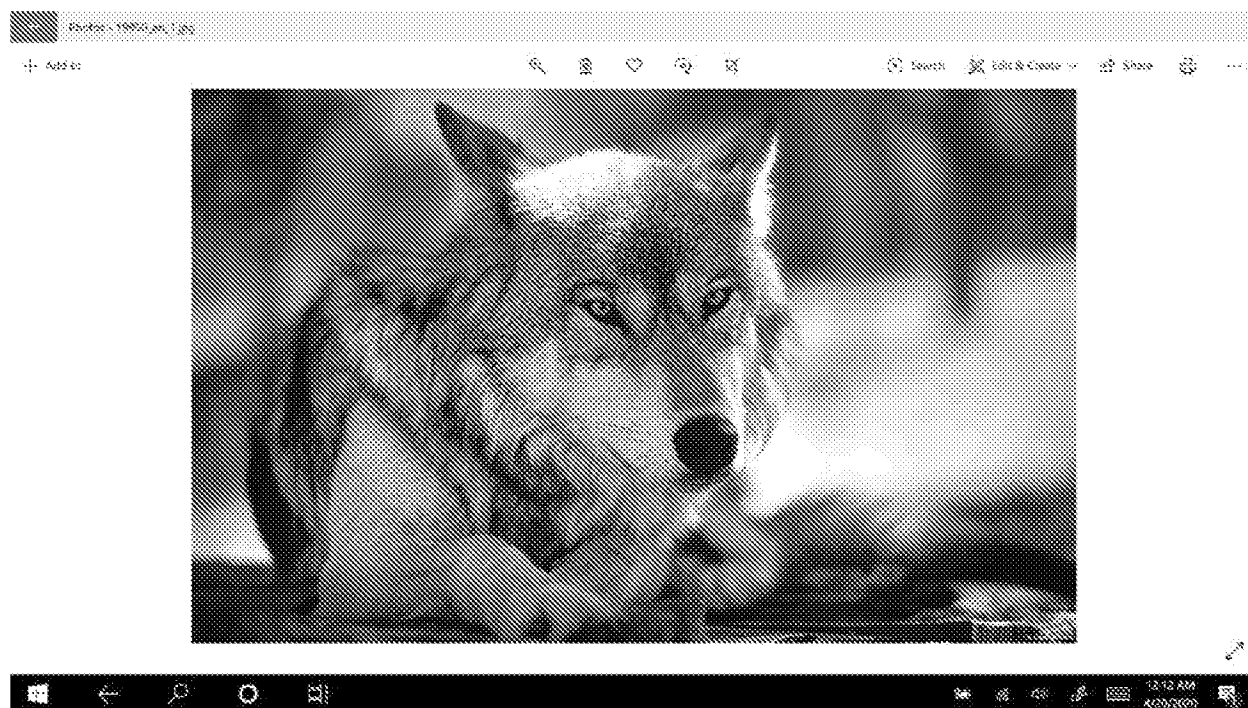
Screenshot from 3rd Generation ThinkPad X1 Yoga, home screen in laptop and tablet modes.

284. The Accused Portable Products (e.g., the 3rd Generation ThinkPad X1 Yoga) include a storage component configured to store an association between at least one of a plurality of visual representations and digital media content. For example, the 3rd Generation ThinkPad X1 Yoga includes the Microsoft Photos app, which is configured to store an association between thumbnail previews of content and digital media content:



Screenshot from 3rd Generation ThinkPad X1 Yoga, Microsoft Photos app.

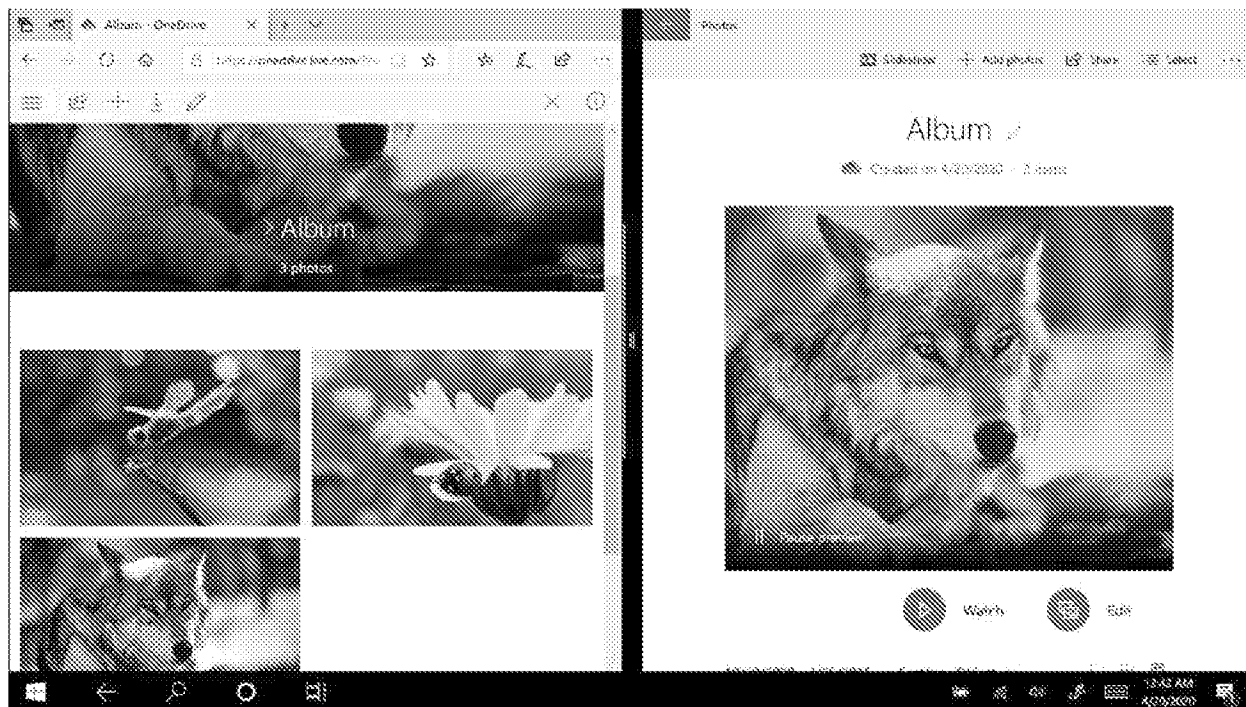
285. The Accused Portable Products (*e.g.*, the 3rd Generation ThinkPad X1 Yoga) include an execution component further configured to execute the association with the at least one of the plurality of visual representations with digital media content in response to selection and transition the display to a view of the digital media content in response to the act of executing the association. For example, selecting a thumbnail preview in the Microsoft Photos app transitions to a view of the digital media content:



Screenshot from 3rd Generation ThinkPad X1 Yoga, Microsoft Photos app.

286. The Accused Portable Products (*e.g.*, the 3rd Generation ThinkPad X1 Yoga) include a display component configured to display user digital media content and referenced digital media content in the view of the digital media content. For example, the 3rd Generation ThinkPad X1 Yoga includes the Microsoft Photos app, which is configured to permit users to

manage digital media content libraries (e.g., in an album located locally or in a remote location such as OneDrive):



Screenshot from 3rd Generation ThinkPad X1 Yoga, OneDrive album and Microsoft Photos app.

Lenovo US

287. Lenovo US has directly infringed and continues to directly infringe, literally and/or equivalently, one or more of the claims of the '888 patent, including at least claim 27, including by importing, using, selling, and offering for sale in the United States certain computing devices with multiple display modes, including at least the Accused Products. D.I. 27 (Noble Declaration), ¶ 2.

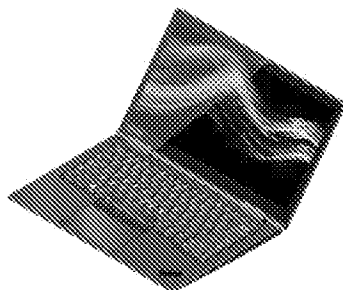
288. Since at least the filing of the Original Complaint Lenovo US knew of the '888 patent.

289. Since at least the filing of the Original Complaint, Lenovo US knew that the Accused Portable Products infringe at least claim 27 of the '888 patent when used by customers or other users, when sold or offered for sale by resellers, and when imported by Lenovo entities.

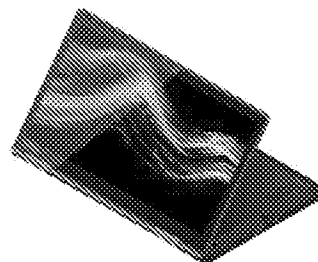
290. Since at least the filing of the Original Complaint, Lenovo US has had the intent to encourage customers or other users to directly infringe at least claim 27 of the '888 patent by continuing to advertise, offer for sale, or sell, or by encouraging resellers to offer for sale or sell the Accused Portable Products in the United States, including in Delaware. Since at least the filing of the Original Complaint, Lenovo US has provided with the Accused Portable Products and on the website <https://www.lenovo.com/us/en> manuals, product documentation, advertising materials and pre-installed software that induce customers or other users to infringe at least claim 27 of the '888 patent by encouraging the use of the Accused Portable Products. For example, in the ThinkPad HTML User Guide Lenovo instructs users that the 3rd Generation ThinkPad X1 Yoga “can be opened to any angle within a range of up to 360 degrees” and that “[b]y rotating the display to different angle, your computer features the following four operating modes”:

Your computer features the following four YOGA modes. You can switch among different modes according to your preference.

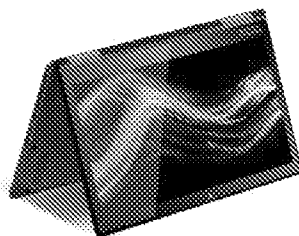
Note: The keyboard and the pointing devices are automatically disabled in the stand mode, tent mode, and tablet mode. Use the touch screen to control your computer instead.



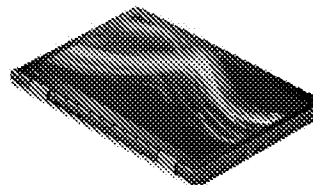
Notabook mode



Stand mode



Tent mode



Tablet mode

See ThinkPad User Guide, p. 29.

291. Since at least the filing of the Original Complaint, Lenovo US's infringement of at least claim 27 of the '888 patent has been willful. Lenovo US's offers for sale, sales, or use of the Accused Portable Products with provision of manuals and instruction to purchasers that encourage use it knows will infringe the '888 patent constitutes willful infringement. Lenovo US is a large corporation with a plethora of resources. Lenovo US's failure to fully investigate the allegations of infringement against it, its offers for sale, sales, and use of the Accused Portable Products, and its failure to take remedial action to avoid infringement evidences its willful infringement.

292. The foregoing description of Lenovo US's infringement is based on publicly available information. LiTL reserves the right to modify this description, including, for example, on the basis of information about the Accused Portable Products that it obtains during discovery.

293. LiTL has been and is being irreparably harmed, and has incurred and will continue to incur damages, as a result of Lenovo US's infringement of the '888 patent.

294. Lenovo US's infringement of the '888 patent has damaged and continues to damage LiTL in an amount yet to be determined, of at least a reasonable royalty.

Lenovo Beijing

295. On information and belief, Lenovo Beijing has had knowledge of the '888 patent since before the filing of the Original Complaint.

296. Lenovo Beijing has extensive experience with intellectual property. Lenovo Beijing has been the owner of over 2,500 patent applications and over 2,200 patents. Over the past decade, Lenovo US has been involved in over 200 patent litigations in the United States, and has been a party in over 50 *inter partes* review proceedings before the U.S. Patent Trial and Appeals Board. The Lenovo 2019 Annual Report identifies intellectual property (IP) risk as one

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