

TCL'S INVALIDITY CONTENTIONS FOR U.S. 8,713,206
Exhibit E3: U.S. Patent No. U.S. Patent Publication No. 2009/0005651 ("Nitta")

As demonstrated in the claim charts below, the asserted claims of U.S. Patent No. 8,713,206 ("the '206 patent") are invalid (a) under one or more sections of 35 U.S.C. § 102 as anticipated by Nitta and (b) under 35 U.S.C. § 103(a) as obvious over Nitta standing alone and as set forth herein, and/or combined with the knowledge of a person of ordinary skill in the art, Applicant's Admitted Prior Art ("AAPA"), and/or the additional prior art references discussed in Exhibits E1-E14, and O5, the contents of which are hereby incorporated by reference into this chart. One of ordinary skill in the art, as of the alleged priority date of the '206 patent, would have known to combine the prior art elements disclosed by the foregoing references using known methods, and to use these elements according to their established functions in order to achieve a known and predictable result.

Except where specifically noted otherwise, this chart may apply the apparent interpretations of claim language as used by Plaintiff in its infringement contentions. Such use, however, does not imply that Defendants adopt or agree with Plaintiff's interpretations in any way. Additionally, by providing contentions for claim preamble elements, Defendants do not take a position on whether the preamble is a claim limitation.

| '206 Claim | Claim Element | Prior Art: U.S. Pat. Pub. No. 2009/005651 ("Nitta") |
|------------|---|---|
| 1.pre | A display control apparatus comprising: | Nitta discloses a display control apparatus. <i>See, e.g.</i> , elements 1.a – 1.c. |
| 1.a | a communication unit configured to communicate with an external device; and | Nitta discloses a communication unit configured to communicate with an external device. For example, Nitta discloses: 2:62-3:15 ("According to a first embodiment of the present invention, there is provided an information processing apparatus including the following elements: a plurality of data-recordable recording media; an operation unit operable to receive an operation from a user; a communication unit operable to output data stored on the recording media to an external device ; and a controller operable to display a setting screen for setting a data output mode for outputting data via the communication unit on a display unit and to control the information processing apparatus on the basis of information input on the setting screen using the operation unit. The controller displays, as the setting screen displayed on the display unit, a function selection screen enabling the user to simultaneously select a recording medium serving as an output data source from which data is output via the communication unit and a function to be executed via the communication unit . On the basis of information input on the function selection screen using the operation unit, the controller performs a |

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| | | <p>setting operation to output data recorded on the selected recording medium in accordance with a communication mode based on the selected function.”)</p> <p>3:42-47 (“<u>The communication unit may output data to the external device via a universal serial bus (USB) cable according to the USB standard.</u> When the USB cable is disconnected from the communication unit or the external device, the controller may maintain the mode of the information processing apparatus set at the time the USB cable was disconnected.”)</p> <p>4:4-16 (“According to a third embodiment of the present invention, there is provided an information processing apparatus including the following elements: a plurality of data-recordable recording media; <u>a USB connector operable to output data stored on the recording media via a USB cable;</u> and a controller operable to display a GUI serving as a function selection screen on a display unit. The controller performs a display operation to display, on the display unit, a GUI enabling a user to select termination of outputting of data via the USB cable or changing of a recording medium serving as an output data source from which data is output via the USB cable or a USB function to be executed.”)</p> <p>7:50-59 (“The imager (video camera) 100 includes <u>a USB terminal 101 serving as a communication unit connecting to USB cables 121</u> and a display unit 102 displaying recorded data and imaging data and presenting a GUI serving as a function selection screen. <u>The imager 100 is configured to be connectable to a PC 111 or a printer 112 serving as an external device via the USB cable 121 connected to the USB terminal 101.</u> The display unit 102 also functions as an operation unit receiving operations from a user.”); <i>see also</i> 3:48-6:23, 16:1-6.</p> <p>To the extent 35 U.S.C. § 112, ¶6 applies, Nitta also discloses the corresponding structure(s) and function(s) claimed or their equivalents, as shown above, or renders them obvious in view of the knowledge of one skilled in the art.</p> |
| 1.b | <p>a display control unit configured to display, on a display unit, an image received from the external device via the communication unit, and if communication with the external device is disconnected, to stop the</p> | <p>Nitta discloses a display control unit configured to display, on a display unit, an image received from the external device via the communication unit, and if communication with the external device is disconnected, to stop the display of the image received from the external device.</p> <p>For example, Nitta discloses:</p> <p>2:62-3:15 (“According to a first embodiment of the present invention, there is provided an information processing apparatus including the following elements: a plurality of data-recordable recording media; an operation unit operable to receive an operation from a user; a communication unit operable to output data stored on the recording media to an external device; and <u>a controller operable to display a setting screen for setting a data output mode for outputting data via the communication unit</u></p> |

| '206 Claim | Claim Element | Prior Art: U.S. Pat. Pub. No. 2009/005651 ("Nitta") |
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| | display of the image received from the external device, | <p><u>on a display unit and to control the information processing apparatus on the basis of information input on the setting screen using the operation unit.</u> The controller displays, as the setting screen displayed on the display unit, a function selection screen enabling the user to simultaneously select a recording medium serving as an output data source from which data is output via the communication unit and a function to be executed via the communication unit. On the basis of information input on the function selection screen using the operation unit, the controller performs a setting operation to output data recorded on the selected recording medium in accordance with a communication mode based on the selected function.”)</p> <p>3:42-47 (“The communication unit may output data to the external device via a universal serial bus (USB) cable according to the USB standard. When the USB cable is disconnected from the communication unit or the external device, <u>the controller may maintain the mode of the information processing apparatus set at the time the USB cable was disconnected.</u>”)</p> <p>4:17-25 (“According to a fourth embodiment of the present invention, there is provided an information processing apparatus including the following elements: a plurality of data-recordable recording media; <u>a USB connector operable to output data stored on the recording media via a USB cable;</u> and a controller operable to maintain, when the USB cable is disconnected from the USB connector, a mode of the information processing apparatus set at the time the USB cable was disconnected.”)</p> <p>7:50-59 (“The imager (video camera) 100 includes a USB terminal 101 serving as a communication unit connecting to USB cables 121 and <u>a display unit 102 displaying recorded data and imaging data</u> and presenting a GUI serving as a function selection screen. The imager 100 is configured to be connectable to a PC 111 or a printer 112 serving as an external device via the USB cable 121 connected to the USB terminal 101. The display unit 102 also functions as an operation unit receiving operations from a user.”).</p> <p>16:1-23 (“As shown in FIG. 7, <u>the information processing apparatus according to the embodiment of the present invention includes</u> a plurality of data-recordable recording media 301 and 302, a USB connector 303 with a USB terminal for outputting data stored on the recording media 301 and 302 via a USB cable, a display unit 304, and <u>a controller 305.</u></p> <p><u>The controller 305 displays a setting screen serving as a GUI for setting the data output mode for outputting data via the USB connector 303 on the display unit 304 and controls the information processing apparatus on the basis of information input to the GUI.</u> That is, the display unit 304 serves also as an operation unit for receiving user operations.</p> |

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| | | <p>The controller 305 displays, as a GUI to be displayed on the display unit 304, a function selection screen enabling the user to select both the recording medium serving as an output data source from which data is output via the USB cable and the USB function (PC mode or PictBridge mode) to be executed, namely, the GUI screen 105 described with reference to FIG. 2. On the basis of selection information input on the function selection screen, the controller 305 performs the setting processing to output data recorded on the selected recording medium in accordance with the selected USB function (PC mode or PictBridge mode).”)</p> <p>2:62-3:15 (“According to a first embodiment of the present invention, there is provided an information processing apparatus including the following elements: a plurality of data-recordable recording media; an operation unit operable to receive an operation from a user; a communication unit operable to output data stored on the recording media to an external device; and a controller operable to display a setting screen for setting a data output mode for outputting data via the communication unit on a display unit and to control the information processing apparatus on the basis of information input on the setting screen using the operation unit. The controller displays, as the setting screen displayed on the display unit, a function selection screen enabling the user to simultaneously select a recording medium serving as an output data source from which data is output via the communication unit and a function to be executed via the communication unit. On the basis of information input on the function selection screen using the operation unit, the controller performs a setting operation to output data recorded on the selected recording medium in accordance with a communication mode based on the selected function.”)</p> <p>4:4-16 (“According to a third embodiment of the present invention, there is provided an information processing apparatus including the following elements: a plurality of data-recordable recording media; a USB connector operable to output data stored on the recording media via a USB cable; and a controller operable to display a GUI serving as a function selection screen on a display unit. The controller performs a display operation to display, on the display unit, a GUI enabling a user to select termination of outputting of data via the USB cable or changing of a recording medium serving as an output data source from which data is output via the USB cable or a USB function to be executed.”)</p> <p>7:50-59 (“The imager (video camera) 100 includes a USB terminal 101 serving as a communication unit connecting to USB cables 121 and a display unit 102 displaying recorded data and imaging data and presenting a GUI serving as a function selection screen. The imager 100 is configured to be connectable to a PC 111 or a printer 112 serving as an external device via the USB cable 121</p> |

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|------------|---------------|---|
| | | <p>connected to the USB terminal 101. The display unit 102 also functions as an operation unit receiving operations from a user.”); <i>see also</i> 3:48-6:23; 16-1:6.</p> <p>2:62-3:15 (“According to a first embodiment of the present invention, there is provided an information processing apparatus including the following elements: a plurality of data-recordable recording media; an operation unit operable to receive an operation from a user; a communication unit operable to output data stored on the recording media to an external device; and <u>a controller operable to display a setting screen for setting a data output mode for outputting data via the communication unit on a display unit and to control the information processing apparatus on the basis of information input on the setting screen using the operation unit.</u> The controller displays, as the setting screen displayed on the display unit, a function selection screen enabling the user to simultaneously select a recording medium serving as an output data source from which data is output via the communication unit and a function to be executed via the communication unit. On the basis of information input on the function selection screen using the operation unit, the controller performs a setting operation to output data recorded on the selected recording medium in accordance with a communication mode based on the selected function.”)</p> <p>3:42-47 (“The communication unit may output data to the external device via a universal serial bus (USB) cable according to the USB standard. When the USB cable is disconnected from the communication unit or the external device, <u>the controller may maintain the mode of the information processing apparatus set at the time the USB cable was disconnected.</u>”)</p> <p>4:17-25 (“According to a fourth embodiment of the present invention, there is provided an information processing apparatus including the following elements: a plurality of data-recordable recording media; <u>a USB connector operable to output data stored on the recording media via a USB cable;</u> and a controller operable to maintain, when the USB cable is disconnected from the USB connector, a mode of the information processing apparatus set at the time the USB cable was disconnected.”)</p> <p>7:50-59 (“The imager (video camera) 100 includes a USB terminal 101 serving as a communication unit connecting to USB cables 121 and <u>a display unit 102 displaying recorded data and imaging data</u> and presenting a GUI serving as a function selection screen. The imager 100 is configured to be connectable to a PC 111 or a printer 112 serving as an external device via the USB cable 121 connected to the USB terminal 101. The display unit 102 also functions as an operation unit receiving operations from a user.”).</p> <p>16:1-23 (“As shown in FIG. 7, <u>the information processing apparatus according to the embodiment of the present invention includes</u> a plurality of data-recordable recording media 301 and 302, a USB</p> |

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