

TCL'S INVALIDITY CONTENTIONS FOR U.S. 8,713,206
Exhibit E5: J.P Pat. App. No. JP2004350160A ("Suda")

As demonstrated in the claim charts below, the asserted claims of U.S. Patent No. 8,713,206 ("the '206 patent") are obvious over one or more sections of 35 U.S.C. § 102 as anticipated by Suda and (b) under 35 U.S.C. § 103(a) as obvious over the prior art, and as set forth herein, and/or combined with the knowledge of a person of ordinary skill in the art, Applicant's AIPA ("AAPA"), and/or the additional prior art references discussed in Exhibits E1-E14, and O5, the contents of which are 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 them 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 in its infringement contentions. Such use, however, does not imply that Defendants adopt or agree with Plaintiff's interpretation in any way. Additionally, by providing contentions for claim preamble elements, Defendants do not take a position on whether such elements are a claim limitation.

'206 Claim	Claim Element	Prior Art: J.P Pat. App. No. JP2004350160A Suda
1.pre	A display control apparatus comprising:	Suda 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	Suda discloses a communication unit configured to communicate with an external device. For example, Suda discloses: ¶ 9 ("The compressed image data is stored temporarily in RAM 108 and recorded on memory card 120 for image recording via a memory interface 112 and connector 113. This is recorded on memory card 120 along with a thumbnail of each image, date and time information on when each image was captured, date and time information on when each image was recorded, and date and time information on when each image was indexed. The memory card 120 is an external device consisting of semiconductor memory."); <i>see also</i> FIGs. 1, 2, 3. ¶ 11 ("When operating in playback mode, image information in a memory card 120, including date and time information, file names, etc.) is read and displayed as image indexing information on display 110 as shown in FIG. 4 (A) if the memory card 120 is connected to the communication unit (memory card slot) as indicated in Operation 1 (wired communication mode) in FIG. 4 (B).")

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		<p>¶ 13 (“As indicated in Operation 2 (wireless communication mode) in FIG. 3, power is transmitted from the memory card 120 via the antenna 116 when the memory card 120 is brought close to the antenna 116. At the same time, communication is established between the antenna 116 and the memory card 120, and image information on the memory card 120 (the image information, time information, file names, etc.) is read via the modem 115. Because communication via the antenna 116 are slower than via the connector 113, the volume of communication of image information that can be read, is limited. The display of image information is also different compared to when the image information is retrieved via the connector 113.”)</p> <p>¶ 15 (“The wired communication mode will be explained first. The wired communication mode is entered when connector 211 is connected to connector 113 in the imaging device 100. In the wired communication mode, control circuit 213 controls the entire card. Control circuit 213 reads data from the imaging device 100 via the communication interface 212, and writes data to the memory circuit 214 and memory circuit 221 in accordance with communication data from the imaging device 100.”)</p> <p>¶ 20 (“Data to be sent from the imaging device 100 to the memory card 120 is modulated by the modulator 232 in the imaging device 100 and outputted wirelessly from the antenna 231. Meanwhile, wireless signals are received by the antenna 217 in the memory card 120, modulated by the modulator 218, and the data from the imaging device 100 is supplied to the control circuit 219. Meanwhile, data to be sent from the control circuit 220 to the imaging device 100 is modulated by the modulator 218 in the memory card 120 and outputted wirelessly from the antenna 217. Meanwhile, wireless signals are received by the antenna 233 in the imaging device 100, demodulated by the demodulator 231, and the data from the memory card 120 is supplied to the CPU 107.”)</p> <p>To the extent 35 U.S.C. § 112, ¶6 applies, Suda also discloses the corresponding structure and function(s) claimed or their equivalents, as shown above, or renders them obvious to one of ordinary knowledge of one skilled in the art.</p> <p>To the extent that Plaintiff alleges that Suda does not explicitly disclose this claim limitation is inherent and/or it would have been obvious in view of the knowledge of one of ordinary skill in the art, AAPA, and/or in view of the references identified in Exhibit 1.</p>
1.b	a display control unit configured to display, on a display unit, an image	Suda 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.

'206 Claim	Claim Element	Prior Art: J.P Pat. App. No. JP2004350160A Suda
	<p>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, Suda discloses:</p> <p>¶ 7 (“FIG. 1 is a schematic block diagram of an example of the present invention. An imaging device 100 is connected via a bus 111, and each unit is controlled by a CPU 107.”)</p> <p>¶ 12 (“When the user has selected a specific image from the image indexing information, the CPU 107 issues a display command using the operating switches 105, the CPU 107 reads the image data from the memory card 120. The retrieved compressed image data is decompressed by the image compression/decompression device 106, and the image is displayed on the display 110.”)</p> <p>¶ 15 (“The wired communication mode will be explained first. The wired communication mode is entered when connector 211 is connected to connector 113 in the imaging device 100. In wired communication mode, control circuit 213 controls the entire card. Control circuit 213 communicates with the imaging device 100 via the communication interface 212, and writes data to the memory circuit 214 and memory circuit 221 in accordance with communication data received from the imaging device 100.”)</p> <p>¶ 18 (“The wireless communication mode will now be explained. In wireless communication mode, control circuit 220 controls the entire card. In wireless communication mode, the card is operated without establishing wired communication via the connector 211. Instead, wireless communication is established with the imaging device 100 via the antennas 216, 217, 218, 219, 220, 21, 25.”)</p> <p>¶ 29 (“The following is an explanation of the reading of data from the memory card 120. FIG. 6 shows the operational algorithm of the CPU 107 when image information on the memory card 120 is displayed by the imaging device 100 on the display 110 in wired communication mode and wireless communication mode.”); <i>see also</i> FIG. 6.</p> <p>¶ 36 (“The following is an explanation of other operations performed to read data from the memory card 120. FIG. 7 shows the operational algorithm of the CPU 107 when image information on the memory card 120 is displayed by the imaging device 100 on the display 110 in wireless communication mode.”); <i>see also</i> FIG. 7.</p> <p>¶ 40 (“FIG. 8 shows the operational algorithm of the CPU 107 when image information on the memory card 120 is displayed by the imaging device 100 on the display 110 in wired communication mode and wireless communication mode.”); <i>see also</i> FIG. 8.</p>

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		<p>¶¶ 24-26 (“The startup sequence for the memory card 120 will now be explained with reference to FIG. 9. Beginning from S901, it is determined in S902 whether or not power is being supplied via the connector 211. If power is being supplied via the connector 211 (Y), the process advances to S903. If power is not being supplied (N), the process advances to S907. In S903, power is supplied to the memory card 120 via the supply circuit 215 via the connector 211 to block 202, memory circuit 214, and memory circuit 213. Control circuit 213 is started up in S904, and data is read from and written to memory circuit 214 and wired communication conducted with external units under the control of control circuit 213 in S905. This is the process for transitioning to wired communication mode (S906). If the result is N in S902, it is determined in S907 whether or not power is being supplied via electromagnetic induction via the antenna 217. If power is being supplied (Y), the process advances to S908. If power is not being supplied (N), the process advances to S912. In S908, power is supplied from power supply circuit 223 via the antenna 217 to block 223 and memory circuit 220. Memory circuit 220 is started up in S909, and data is read from and written to memory circuit 220. This is the process for transitioning to wireless communication mode (S910). If the result is Y in S907, the process for transitioning to wireless communication mode (S911). If the result is N in S907, the process for transitioning to wireless communication mode (S911). If the result is N in S911, the memory card is turned OFF in S912.”)</p> <p>¶¶ 36-39 (“The following is an explanation of other operations performed to read information from the memory card 120. FIG. 7 shows the operational algorithm of the CPU 107 when information from the memory card is displayed by the imaging device 100 on the display 110 in wireless communication mode. Beginning from S701, it is determined in S702 whether a wireless connection has been established with memory card #1 in wireless communication mode. If the card has not been connected in wireless mode (N), the process advances to S702. If the card has been connected in wireless mode (Y), the process advances to S703. Image information is read from memory circuit 221 in the memory card #1 and displayed on display 110 in S703. In S704, it is determined whether or not the wireless connection with memory card #1 has been interrupted. If the wireless connection has not been interrupted (N), the process returns to S703. If the wireless connection has been interrupted (Y), the process advances to S705. In S705, it is determined whether a wireless connection has been established with memory card #3. If a wireless connection has been established (Y), the process advances to S706. If not (N), the process advances to S706. In S706, the process enters standby for a predetermined period of time T1. If predetermined period of time T1 has not been reached, the process returns to S704. If predetermined period of time T1 has been reached, the process advances to S707. In S707, information of information recorded in memory circuit 221 of image recording card #1 is displayed on display 110 when communication has been interrupted and there is more information to display.”)</p>

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		<p>after communication is re-established, the display of information is ended even within the predetermined period of time (T1). However, when there is no more information and communication has not been re-established, the information continues to be displayed for a predetermined period of time (T1).”)</p> <p>¶¶ 40-42 (“The following is an explanation of other operations performed to read information from a memory card 120. FIG. 8 shows the operational algorithm of the CPU 107 when information from the memory card 120 is displayed by the imaging device 100 on the display 110 in either wired communication mode and wireless communication mode. Beginning from S801, the process determines in S802 whether or not memory card #1 has been connected in wireless communication mode. If memory card #1 has not been connected in wireless mode (N), the process advances to S803. If memory card #1 has been connected wirelessly (Y), the process advances to S805. In S803, it is determined whether or not memory card #2 has been connected in the card slot in wired communication mode. If memory card #2 has been connected in wired mode (Y), the process advances to S804. If the card has not been connected in wired mode (N), the process advances to S802. In S804, image information is read from memory circuit 221 and memory circuit 214 in memory card #2 and displayed on the display 110. See also ¶¶ 48-49.</p> <p>To the extent 35 U.S.C. § 112, ¶6 applies, Suda also discloses the corresponding structure and function(s) claimed or their equivalents, as shown above, or renders them obvious to one of ordinary knowledge of one skilled in the art.</p> <p>To the extent that Plaintiff alleges that Suda does not explicitly disclose this claim limitation, such limitation is inherent and/or it would have been obvious in view of the knowledge of one of ordinary skill in the art, AAPA, and/or in view of the references identified in Exhibit 1.</p>
1.c	wherein the display control unit varies a period of time from the disconnection to the stopping of the display of the image depending on a type of the external device.	<p>Suda discloses that the display control unit varies a period of time from the disconnection to the stopping of the display of the image depending on a type of the external device.</p> <p><i>See, e.g.,</i> element 1.b.</p> <p>In addition, Suda discloses:</p> <p>(“[Claim 1] An imaging device comprising a wired communication means able to communicate with a memory card, a wireless communication means able to communicate with a memory card, and a display means for displaying an image. The imaging device continues to display image information from a first memory card for a predetermined period of time when wireless communication with the first memory card is interrupted.”)</p>

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