TCL'S INVALIDITY CONTENTIONS FOR U.S. 8,713,206
Exhibit E14: European Patent Application No. EP0989729 ("Takiguchi")

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 Takiguchi and (b) under 35 U.S.C. § 103(a) as obvious over Takiguchi 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: EP0989729 ("Takiguchi")
1.pre	A display control apparatus comprising:	Takiguchi discloses a display control apparatus. *See, e.g.*, elements 1.a – 1.c.
1.a	a communication unit configured to communicate with an external device; and	Takiguchi discloses a communication unit configured to communicate with an external device. For example, Takiguchi discloses: ¶42 ("In the third example, the camera has already been set in a given mode, the corresponding application has already been started, and the camera and application are connected and communicate with each other. In this state, when the user sets the camera in another mode (step S403), the camera sends a disconnection message to the connected application at that timing to disconnect the communication with the application (step S405). At this time, whether the application automatically ends or is disconnected but kept running depends on the setups of the application. A message indicating a new mode in which the camera is set currently is sent to the PC (step S406). After that, the camera checks if sensed images are present in the camera (step S407). If no images are present, the camera also sends a message indicating that no images are present in the camera (step S408)."); ¶44 ("The STI starts an associated application in correspondence with the message of each mode. Fig. 5 shows this process.");

'206 Claim	Claim Element	Prior Art: EP0989729 ("Takiguchi")
		¶47 ("It is checked in step S601 if images are present in the camera. This checking step is attained by checking if the message issued in step S408 in Fig. 4 has arrived at the PC. If this message has arrived, the browser software displays a message indicating no image (step S602), and ends itself (step S603)."); ¶48 ("If images are present, the browser software sends an image transfer request to the camera in step S604. The camera checks if the received message is an image transfer request (step S605), and then checks if all images have already been transferred (step S606). If images to be transferred still remain, the camera sends image data to the browser software in step S608. The browser software receives the image data in step S609, and displays that image data on the PC screen in step S610."); ¶54 ("When the mode dial switch 2 is set at the Rec mode 2b, the on-line image sensing software is automatically started. The on-line image sensing software sends a reduced-scale image transmission request to the camera (step S701). This reduced-scale image is to be displayed on the preview area 802. In order to attain preview display that moves as smooth as possible, i.e., to transfer image frames as much as possible, a reduced-scale image is requested in place of a full-size image which is equal to the sensed image size."); ¶76 ("If it is determined in step S1102 that the camera is in the playback mode, the software is started in an image browsing mode in step S1103. The subsequent operation is the same as that described in the first embodiment."); *see also* FIGs. 1-11, Abstract, ¶¶1-8, 13, 15, 17, 19, 27, 29, 30, 34-37, 39-41, 52, 55, 56, 61, 62, 73, 77-79, Claims 1-7, 11-17, 21-22, 25-26. To the extent that Plaintiff alleges that Takiguchi does not explicitly disclose this claim limitation, this limitation is inherent and/or it would have been obvious in view of the knowledge of a person of ordinary skill in the art, AAPA, and/or the references identified in Exhibits E1-E14, and O5. To the extent 35 U.S.C. § 112, ¶6 applies, Takiguchi 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.
1.b	a display control unit configured to display, on a display unit, an image received from the external device via the communication	Takiguchi 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. For example, Takiguchi discloses:

'206 Claim	Claim Element	Prior Art: EP0989729 ("Takiguchi")
	unit, and if communication with the external device is disconnected, to stop the display of the image received from the external device,	¶42 ("In the third example, the camera has already been set in a given mode, the corresponding application has already been started, and the camera and application are connected and communicate with each other. In this state, when the user sets the camera in another mode (step S403), the camera sends a disconnection message to the connected application at that timing to disconnect the communication with the application (step S405). At this time, whether the application automatically ends or is disconnected but kept running depends on the setups of the application. A message indicating a new mode in which the camera is set currently is sent to the PC (step S406). After that, the camera checks if sensed images are present in the camera (step S407). If no images are present, the camera also sends a message indicating that no images are present in the camera (step S408)."); ¶44 ("The STI starts an associated application in correspondence with the message of each mode. Fig. 5 shows this process."); ¶47 ("It is checked in step S601 if images are present in the camera. This checking step is attained by checking if the message issued in step S408 in Fig. 4 has arrived at the PC. If this message has arrived, the browser software displays a message indicating no image (step S602), and ends itself (step S603)."); ¶48 ("If images are present, the browser software sends an image transfer request to the camera in step S604. The camera checks if the received message is an image transfer request (step S605), and then checks if all images have already been transferred (step S606). If images to be transferred still remain, the camera sends image data to the browser software in step S608. The browser software receives the image data in step S609, and displays that image data on the PC screen in step S610."); ¶50 ("When another mode is selected at the camera while the browser software is connected to the camera, or when the power switch of the camera is turned off, the camera sends a corresponding message to the browser software. At this time, the browser software executes a process for disconnecting the communication with the camera, and then executes one of the following three options."); ¶51 ("The first option automatically ends the browser software, the second option displays a message indicating that the connection with the camera is disconnected by user operation to the user, and prompts the user to select whether the browser software is to end or continue, and the third option continues to run the browser software. These options can be selected from a setup menu of the browser software. As a default, the second option that prompts the user to select whether the browser software is to end or continue is preferably set.");

'206 Claim	Claim Element	Prior Art: EP0989729 ("Takiguchi")
		¶52 ("A case will be exemplified below wherein the mode dial switch is set at the Rec mode 2b. In this case, the on-line image sensing software is started. Fig. 8 shows an example of the on-line image sensing software. An image which is being currently seen by the camera is displayed on a preview area 802 in a window 801 as a preview image. When the user presses an image sensing button 803 at a shutter chance while observing the preview image, the camera senses the image, and sensed image data is displayed on a window 804. When the user presses a save button, the sensed image data can be saved as an image file."); ¶54 ("When the mode dial switch 2 is set at the Rec mode 2b, the on-line image sensing software is automatically started. The on-line image sensing software sends a reduced-scale image transmission request to the camera (step S701). This reduced-scale image is to be displayed on the preview area 802. In order to attain preview display that moves as smooth as possible, i.e., to transfer image frames as much as possible, a reduced-scale image is requested in place of a full-size image which is equal to the sensed image size."); ¶58 ("When another mode is selected at the camera while the on-line image sensing software is connected to the camera, or when the power switch of the camera is turned off, the camera sends a corresponding message to the on-line image sensing software. At this time, the on-line image sensing software executes a process for disconnecting the communication with the camera, and then automatically ends itself. The aforementioned browser software has options for selecting, e.g., whether or not the software continues to run, but such options are not available for this software. This is because the on-line image sensing software does not function at all unless it is connected to the camera.); ¶60 ("It is checked in step S901 if images are present in the camera. This checking step is attained by checking if the message issued in step S408 in Fig. 4 has arrived at the PC. If this message has arrived, the stitch synthesis software displays a message indicating that no images are stored in the camera (step S902), and ends (step S903)."); ¶64 ("When another mode is selected at the camera while the stitch synthesis software is connected to the camera, or when the power switch of the camera is turned off, the camera sends a corresponding message to the stitch synthesis software. At this time, the stitch synthesis software disconnects the connection with the camera. In this case, if all the stitch assist images in the camera have already been loaded, the stitch synthesis software continues a synthesis process. However, if all the images have not been loaded yet, the stitch synthesis software automatically ends itself since it cannot execute a synthesis process.");

'206 Claim	Claim Element	Prior Art: EP0989729 ("Takiguchi")
		¶66 ("It is checked in step S1001 if images are present in the camera. This checking step is attained by checking if the message issued in step S408 in Fig. 4 has arrived at the PC. If this message has arrived, the slideshow playback software displays a message indicating that no images are stored in the camera (step S1002), and ends itself (step S1003)."); ¶76 ("If it is determined in step S1102 that the camera is in the playback mode, the software is started in an image browsing mode in step S1103. The subsequent operation is the same as that described in the first embodiment."); ¶80 ("The objects of the present invention are also achieved by supplying a storage medium, which records a program code of a software program that can implement the functions of the above-mentioned embodiments to the system or apparatus, and reading out and executing the program code stored in the storage medium by a computer (or a CPU or MPU) of the system or apparatus"); ¶81 ("In this case, the program code itself read out from the storage medium implements the functions of the above-mentioned embodiments, and the storage medium which stores the program code constitutes the present invention."); *see also* FIGs. 1-11, Abstract, ¶¶1-8, 13, 15, 17, 19, 21, 23, 27, 29, 30, 34, 35-37, 39-41, 49, 53, 55, 56, 61, 62, 72, 73, 77-79, Claims 1-26. To the extent that Plaintiff alleges that Takiguchi does not explicitly disclose this claim limitation, this limitation is inherent and/or it would have been obvious in view of the knowledge of a person of ordinary skill in the art, AAPA, and/or the references identified in Exhibits E1-E14, and O5. To the extent 35 U.S.C. § 112, ¶6 applies, Takiguchi 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.
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.	Takiguchi 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. *See, e.g.*, element 1.b. In addition, Takiguchi discloses: ¶42 ("In the third example, the camera has already been set in a given mode, the corresponding application has already been started, and the camera and application are connected and communicate with each other. In this state, when the user sets the camera in another mode (step S403), the camera

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