

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

ROKU, INC.

Petitioner,

v.

CANON KABUSHIKI KAISHA

Patent Owner.

Case IPR2020-00355

U.S. Patent No. 7,746,413

PETITION FOR *INTER PARTES* REVIEW

The '413 Accused Products may be operated through voice commands **when the voice command button on an enhanced remote control, such as a magnifying glass button, as shown below, is pressed. An operation screen is then displayed on the television, displaying a microphone and a message to hold the microphone button and speak, also as shown below.**



As shown below, **if the '413 Accused Product does not detect or recognize the voice command, a different form is displayed prompting the user to retry the voice search, or to click one of two options: (1) text search, or (2) cancel the voice control process.**



If “Text search” is selected, another operation form is displayed, allowing the user to type in text by navigating an on-screen keyboard using the enhanced remote control, as shown below.



Ex. 1011 ¶¶68-70 (emphasis added; footnote omitted); *see also* ¶¶71-72 (control of a phone display displays operation forms depending on the buttons/inputs (attributes) that the phone receives). The litigation exhibit is submitted by

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

CANON, INC.

Plaintiff,

vs.

TCL ELECTRONICS HOLDINGS LTD.,
TCL CORPORATION,
SHENZEN TCL NEW TECHNOLOGIES CO.
LTD.,
TCL KING ELECTRICAL APPLIANCES
(HUIZHOU) CO., LTD.,
TCL KING ELECTRONICS (CHENGDU)
CO., LTD.,
TCL KING ELECTRICAL APPLIANCES
(NANCHANG) CO., LTD.,
TCL TONGLI ELECTRONICS (HUIZHOU)
CO., LTD.,
TONLY ELECTRONICS HOLDINGS LTD.

Defendants.

CIVIL ACTION NO. 2:18-cv-00546

JURY TRIAL DEMANDED

FIRST AMENDED COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff Canon, Inc. (“Canon” or “Plaintiff”) brings this First Amended Complaint for Patent Infringement (“Amended Complaint”) and for Jury Trial against Defendants TCL Electronics Holdings Ltd. (formerly known as TCL Multimedia Technology Holdings, Ltd.), TCL Corporation, Shenzen TCL New Technologies Co. Ltd., TCL King Electrical Appliances (Huizhou) Co., Ltd., TCL King Electronics (Chengdu) Co., Ltd., TCL King Electrical Appliances (Nanchang) Co., Ltd., TCL Tongli Electronics (Huizhou) Co., Ltd. and Tonly Electronics Holdings Ltd. (collectively, “TCL” or “Defendants”). Canon alleges as follows:

Roku Exhibit 1011

Kabushiki Kaisha” as their Assignee, “Canon Kabushiki Kaisha” is a Japanese translation for Canon Inc. and is an identical entity as Canon Inc., the plaintiff of this action.

51. The Asserted Patents are valid and enforceable.

DEFENDANTS’ INFRINGING PRODUCTS AND ACTIVITIES

52. Defendants, directly or through intermediaries, including its subsidiaries, make, use, sell, offer to sell within the United States and/or import into the United States and this District infringing television systems that integrate the Roku operation system (“Roku OS”) (henceforth, “Roku TV”).

53. Certain Roku TVs comprise a television that displays a number of operation screens, each with a number of operation forms that can be and are displayed, depending on the remote control device being used. They are capable of acquiring an attribute of a remote control device and determining an operation form corresponding to the remote control device from among a plurality of operation forms based on the acquired attribute of the remote control device by evaluating a degree of suitability between the remote control device and the plurality of operation forms and display an operation screen related to the determined operation form displayed.

54. Certain Roku TVs, moreover, comprise a television to which various classes / types of external devices can be connected; contents retrieved from these various external devices can be displayed on the system’s display. Furthermore, each of these Roku TVs are capable of recognizing and also distinguishing among the classes / types of external devices connected to the television. Depending on the class / type of the external device connected to the system, the Roku TVs are capable of determining whether to continue (or to end) displaying

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