TCL'S INVALIDITY CONTENTIONS FOR U.S. 8,078,767
Exhibit C3: U.S. Patent No. 8,612,653 ("Nitta")

As demonstrated in the claim charts below, the asserted claims of U.S. Patent No. 8,078,767 ("the '767 patent") ar
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
and as set forth herein, and/or combined with the knowledge of a person of ordinary skill in the art, Applicant's A
and/or the additional prior art references discussed in Exhibits C1-C14, and O3, the contents of which are hereby i
reference into this chart. One of ordinary skill in the art, as of the alleged priority date of the '767 patent, would h
combine the prior art elements disclosed by the foregoing references using known methods, and to use these elem
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
its infringement contentions. Such use, however, does not imply that Defendants adopt or agree with Plaintiff's in
way. Additionally, by providing contentions for claim preamble elements, Defendants do not take a position on w
is a claim limitation.

'767 Claim	Claim Element	Prior Art: U.S. Patent No. 8,612,653 ("Nitta")
1.pre	A display apparatus characterized by comprising:	Nitta discloses a display apparatus. *See, e.g.*, elements 1.a – 1.d.
1.a	a display unit;	Nitta discloses a display unit. For example, Nitta discloses: 2:62-3:15 ("According to a first embodiment of the present invention, there is pro processing apparatus including the following elements: a plurality of data-recorda an operation unit operable to receive an operation from a user; a communication u output data stored on the recording media to an external device; and a controller c setting screen for setting a data output mode for outputting data via the communic **display unit** and to control the information processing apparatus on the basis of i the setting screen using the operation unit. **The controller displays, as the settin on the display unit**, a function selection screen enabling the user to simultaneous medium serving as an output data source from which data is output via the comm function to be executed via the communication unit. On the basis of information i selection screen using the operation unit, the controller performs a setting operati

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		recorded on the selected recording medium in accordance with a communication selected function.") 4:4-16 ("According to a third embodiment of the present invention, there is provi processing apparatus including the following elements: a plurality of data-recorda a USB connector operable to output data stored on the recording media via a USB controller operable to display a GUI serving as a function selection screen on a di **controller performs a display operation to display, on the display unit**, a GUI select termination of outputting of data via the USB cable or changing of a record as an output data source from which data is output via the USB cable or a USB fu executed.") 7:50-59 ("The imager (video camera) 100 includes a USB terminal 101 serving as unit connecting to USB cables 121 and **a display unit 102 displaying recorded d data** and presenting a GUI serving as a function selection screen. The imager 100 connectable to a PC 111 or a printer 112 serving as an external device via the USB connected to the USB terminal 101. The display unit 102 also functions as an ope operations from a user."); *see also* 3:48-6:23; 16-1:6. To the extent 35 U.S.C. § 112, ¶6 applies, Nitta also discloses the corresponding s function(s) claimed or their equivalents, as shown above, or renders them obvious knowledge of one skilled in the art.
1.b	a connection unit configured to connect an external device to be able to communicate with the external device; and	Nitta discloses a connection unit configured to connect an external device to be al with the external device. For example, Nitta discloses: 2:62-3:15 ("According to a first embodiment of the present invention, there is pro processing apparatus including the following elements: a plurality of data-recorda an operation unit operable to receive an operation from a user; **a communication output data stored on the recording media to an external device**; and a contro display a setting screen for setting a data output mode for **outputting data via th unit on a display unit** and to control the information processing apparatus on the input on the setting screen using the operation unit. The controller displays, as the displayed on the display unit, a function selection screen enabling the user to simu recording medium serving as an output data source from which **data is output vi**

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		communication unit and a function to be executed via the communication un information input on the function selection screen using the operation unit, the co setting operation to output data recorded on the selected recording medium in acc communication mode based on the selected function.") 3:42-47 ("**The communication unit may output data to the external device via bus (USB) cable according to the USB standard**. When the USB cable is disco communication unit or the external device, the controller may maintain the mode processing apparatus set at the time the USB cable was disconnected.") 4:4-16 ("According to a third embodiment of the present invention, there is provi processing apparatus including the following elements: a plurality of data-recorda **a USB connector operable to output data stored on the recording media via a** controller operable to display a GUI serving as a function selection screen on a di controller performs a display operation to display, on the display unit, a GUI enab termination of outputting of data via the USB cable or changing of a recording me output data source from which data is output via the USB cable or a USB functio 7:50-59 ("The imager (video camera) 100 includes **a USB terminal 101 serving unit connecting to USB cables 121** and a display unit 102 displaying recorded d and presenting a GUI serving as a function selection screen. **The imager 100 is c connectable to a PC 111 or a printer 112 serving as an external device via the connected to the USB terminal 101**. The display unit 102 also functions as an op receiving operations from a user."); *see also* 3:48-6:23, 16:1-6. To the extent 35 U.S.C. § 112, ¶6 applies, Nitta also discloses the corresponding s function(s) claimed or their equivalents, as shown above, or renders them obvious knowledge of one skilled in the art.
1.c	a control unit configured to control said display unit to make a display based on data received from the external device with which a communication connection is	Nitta discloses a control unit configured to control said display unit to make a dis received from the external device with which a communication connection is esta connection unit. For example, Nitta discloses: 2:62-3:15 ("According to a first embodiment of the present invention, there is pro processing apparatus including the following elements: a plurality of data-recorda an operation unit operable to receive an operation from a user; a communication u

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	established via said connection unit,	output data stored on the recording media to an external device; and **a controller a setting screen for setting a data output mode for outputting data via the co on a display unit and to control the information processing apparatus on the information input on the setting screen using the operation unit**. The controll setting screen displayed on the display unit, a function selection screen enabling t simultaneously select a recording medium serving as an output data source from via the communication unit and a function to be executed via the communication information input on the function selection screen using the operation unit, the co setting operation to output data recorded on the selected recording medium in acc communication mode based on the selected function.") 3:42-47 ("The communication unit may output data to the external device via a u (USB) cable according to the USB standard. When the USB cable is disconnected communication unit or the external device, **the controller may maintain the mo information processing apparatus set at the time the USB cable was disconne** 4:17-25 ("According to a fourth embodiment of the present invention, there is pro processing apparatus including the following elements: a plurality of data-recorda **a USB connector operable to output data stored on the recording media via a** controller operable to maintain, when the USB cable is disconnected from the US of the information processing apparatus set at the time the USB cable was disconn 7:50-59 ("The imager (video camera) 100 includes a USB terminal 101 serving as unit connecting to USB cables 121 and **a display unit 102 displaying recorded data** and presenting a GUI serving as a function selection screen. The imager 100 connectable to a PC 111 or a printer 112 serving as an external device via the USB connected to the USB terminal 101. The display unit 102 also functions as an ope operations from a user."). 16:1-23 ("As shown in FIG. 7, **the information processing apparatus according embodiment of the present invention includes** a plurality of data-recordable rec and 302, a USB connector 303 with a USB terminal for outputting data stored on 301 and 302 via a USB cable, a display unit 304, and **a controller 305**. **The controller 305 displays a setting screen serving as a GUI for setting the d for outputting data via the USB connector 303 on the display unit 304 and co**

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		information processing apparatus on the basis of information input to the G display unit 304 serves also as an operation unit for receiving user operations. The controller 305 displays, as a GUI to be displayed on the display unit 304, a fu screen enabling the user to select both the recording medium serving as an output which data is output via the USB cable and the USB function (PC mode or PictBr executed, namely, the GUI screen 105 described with reference to FIG. 2. On the information input on the function selection screen, the controller 305 performs th to output data recorded on the selected recording medium in accordance with the function (PC mode or PictBridge mode).") ; *see also* 3:48-6:23; 18:8-23. To the extent that Plaintiff alleges that Nitta does not explicitly disclose this clain limitation is inherent and/or it would have been obvious in view of the knowledg ordinary skill in the art, AAPA, and/or the references identified in Exhibits C1-C To the extent 35 U.S.C. § 112, ¶6 applies, Nitta also discloses the corresponding function(s) claimed or their equivalents, as shown above, or renders them obvious knowledge of one skilled in the art.
1.d	characterized in that said control unit acquires class information indicating a class of the external device from the external device via said connection unit, controls said display unit to continue the display based on the data received from the external device at the time of disconnection of the communication connection with the external device if the class of the external device indicated by the class information is a predetermined class, and	Nitta discloses a control unit that acquires class information indicating a class of from the external device via said connection unit, controls said display unit to cor based on the data received from the external device at the time of disconnection c connection with the external device if the class of the external device indicated by information is a predetermined class, and controls said display unit to end the disp data received from the external device at the time of disconnection of the commu with the external device if the class of the external device indicated by the class i predetermined class. *See, e.g.* element 1.c. In addition, Nitta discloses: 1:49-57 ("The USB connection between the imager and the PC involves **a comm specification (PC mode) such as the USB mass storage class or picture transf** In contrast, **the USB connection between the imager and the printer involves specification "PictBridge" standardizing the interface between PTP defining**

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