

**UNITED STATES INTERNATIONAL TRADE COMMISSION
WASHINGTON D.C.**

**Before the Honorable Cameron R. Elliot
Administrative Law Judge**

In the Matter of

**CERTAIN GRAPHICS SYSTEMS,
COMPONENTS THEREOF, AND
DIGITAL TELEVISIONS CONTAINING
THE SAME**

Investigation No. 337-TA-1318

G.R. 5.3 JOINT FINAL CASE NARROWING DISCLOSURE

Pursuant to Ground Rule 5.3 and the Procedural Schedule (Order No. 9), Complainants Advanced Micro Devices, Inc. and ATI Technologies ULC (collectively “AMD” or “Complainants”) and Respondents TCL Industries Holdings Co., Ltd., TCL Industries Holdings (H.K.) Co. Limited, TCL Electronics Holdings Limited f/k/a TCL Multimedia Technology Holdings, Ltd., TCL Technology Group Corporation, TTE Corporation, TCL Holdings (BVI) Limited, TCL King Electrical Appliances (Huizhou) Co., Ltd., Shenzhen TCL New Technology Co., Ltd., TCL MOKA International Limited, TCL Smart Device (Vietnam) Co., Ltd., Manufacturas Avanzadas SA de CV, TCL Smart Device (Vietnam) Co., Ltd., and TCL Overseas Marketing Ltd. (collectively, “TCL”), and Realtek Semiconductor Corp. (“Realtek”) (TCL and Realtek together, “Respondents”) respectfully submit this Joint Final Case Narrowing Disclosure.

I. Complainants’ Final Case-Narrowing Disclosure Statement

AMD respectfully submits that it presently asserts¹ thirteen (13) total claims, comprising three (3) independent claims and ten (10) dependent claims, across three patents, as set forth in the

¹ AMD contemporaneously noticed its motion for partial termination of the Investigation by withdrawal of claims 1-4 and 7 of U.S. Patent No. 7,742,053 and claims 8, 11, and 12 of U.S. Patent No. 11,184,628.

table below (with independent claims in bold):

7,742,053	5, 6, 8, 9
8,854,381	15-20
11,184,628	7, 9, 10

AMD has narrowed its asserted claims from 37 to 13 (pending the Administrative Law Judge’s grant of AMD’s forthcoming motion for partial termination, *see n.1 supra*), including withdrawing two asserted patents, over the course of this Investigation. Thus AMD has followed its commitment to reduce its claims to approach the maximum number it set forth in its first G.R. 5.3 disclosure of 12-18 claims.

II. Respondents’ Final Case-Narrowing Disclosure Statement

Respondents have narrowed the number of prior-art references to 56, which is less than the number specified in the Joint Maximum Scope Disclosure. Those prior-art references are identified in the table below. Respondents have demonstrated their commitment to narrowing their invalidity defense by reducing the number of relevant prior-art references from the more than 300 references they disclosed in their Notice of Prior Art to the 56 references that they may rely on at the hearing. Respondents will assess Complainants’ disclosure and promptly inform the ALJ if the withdrawal of any patents or claims further reduces the number of prior-art references Respondents may assert at the hearing.

3dfx Interactive, <i>FXTI Texture Compression Technology White Paper</i>
Amanatides et al., <i>A Simple, Flexible, Parallel Graphics Architecture</i> (1993)
Edward Delp et al., <i>Image Compression Using Block Truncation Coding</i> (October 1979)
European Patent Application EP1993038A1 (published November 19, 2008) (“Yokote”)
European Patent Specification EP1291765B1 (published December 30, 2009) (“Kimura”)
GB2274754A (published August 3, 1994) (“Shin”)
GB2348971A (published October 18, 2000) (“Greer”)

H. Selzer, <i>Dynamic Load Balancing Within a High Performance Graphics System</i> (1991)
Hirata et al., <i>An Elementary Processor Architecture with Simultaneous Instruction Issuing from Multiple Threads</i> (1992)
Jacob Ström et.al, <i>iPACKMAN - High-Quality, Low-Complexity Texture Compression for Mobile Phones</i> (July 30, 2005)
Nvidia, <i>NVIDIA GeForce 8800 GPU Architecture Overview</i> (November 2006)
Oskar Alexanderson et al, <i>Compressing dynamically generated texture on the GPU</i> (May 2006)
Owens et al., <i>Polygon Rendering on a Stream Architecture</i> (2000)
Seiler et al., Larrabee: <i>A Many-core x86 Architecture for Visual Computing</i> (August 2008)
US20040151372 (published November 8, 2001) ("Reshetov 372")
US20040228527 (published November 18, 2004) ("Iourcha 527")
US20070091097 (published March 8, 2011) ("Zhang")
US20090073168 (published March 19, 2009) ("Jiao 168")
US20090150654 (published June 11, 2009) ("Oberman")
US20090153570A1 (published June 18, 2009) ("Jiao 570")
US20100123717 (published May 20, 2010) ("Jiao 717")
US20100153686 (published April 19, 2011) ("Frank")
US20110050712 (published March 3, 2011) ("Jackson")
US5500939 (issued March 19, 1996) ("Kurihara")
US5808690 (issued September 15, 1998) ("Rich")
US5968167 (issued October 19, 1999) ("Whittaker")
US6105127 (issued August 15, 2000) ("Kimura")
US6683978 (issued January 27, 2004) ("Iourcha 978")
US6975773 (issued December 13, 2005) ("Govindaswamy")
US7015913 (issued March 21, 2006) ("Lindholm 913")
US7038685 (issued May 2, 2006) ("Lindholm 685")
US7116332 (issued October 3, 2006) ("Boyd 332")
US7324520 (issued January 29, 2008) ("Lakshmanamurthy")
US7388993 (issued June 17, 2008) ("Govindaswamy")
US7447873B1 (issued November 4, 2008) ("Nordquist '873")
US7605825 (issued October 20, 2009) ("Lau")
US7634637 (issued December 15, 2009) ("Lindholm 637")
US7787691 (issued August 31, 2010) ("Strom 691")
US7873212 (issued January 18, 2011) ("Roimela")
US7961195 (issued June 14, 2011) ("Rogers")
US8102402B2 (issued January 24, 2012) ("Sorgard")
US8141088 (issued March 20, 2012) ("Morishita")
US8151095 (issued April 3, 2012) ("Wilt")
US8165195 (issued April 24, 2012) ("Song")

US8223158 (issued July 17, 2012) ("Lindholm 158")
US8319774 (issued November 27, 2012) ("Jiao '774")
US8345053 (January 1, 2013) ("Jiao 053")
US8542247 (issued September 24, 2013) ("Hakura")
US8633936 (issued January 21, 2014) ("Du")
US9158575B2 (issued October 13, 2015) ("Smith")
US9298498B2 (issued March 29, 2016) ("Gosalia")
WO2000062182A2 (published October 19, 2000) ("Stuttard")
WO2000063770A1 (published October 26, 2000) ("Williams")
WO2001073618 (published October 4, 2001) ("Ussery")
WO2006006915A1 (published January 19, 2006) ("Strom 915")
WO2007021227A1 ("Strom 227")

Date: January 27, 2023

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United States International Trade Commission
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Certain Graphics Systems, Components Thereof, and Digital Televisions Containing the Same

CERTIFICATE OF SERVICE

I, Megan A. De Renzis, hereby certify that on January 27, 2023, true and correct copies of the forgoing document were served on the parties as indicated below:

<p>The Honorable Katherine M. Hiner Acting Secretary to the Commission United States International Trade Commission 500 E Street SW, Room 112 Washington, DC 20436</p>	<p><input checked="" type="checkbox"/> Via EDIS <input type="checkbox"/> Via Hand Delivery <input type="checkbox"/> Via Federal Express (Overnight) <input type="checkbox"/> Via Electronic Mail</p>
<p>The Honorable Cameron R. Elliot Administrative Law Judge United States International Trade Commission 500 E Street SW, Room 317 Washington, DC 20436 MTurner@usitc.gov</p>	<p><input type="checkbox"/> Via EDIS <input type="checkbox"/> Via Hand Delivery <input type="checkbox"/> Via Federal Express (Overnight) <input checked="" type="checkbox"/> Via Electronic Mail</p>
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United States International Trade Commission

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