

**NITED STATES INTERNATIONAL TRADE COMMISSION
WASHINGTON, D.C.**

In the Matter of

**CERTAIN DISPLAY DEVICES,
STREAMING PLAYERS, AND
COMPONENTS THEREOF**

Investigation No. 337-TA-1496

**AMENDED COMPLAINT OF INNOTV LABS, LLC, UNDER SECTION 337 OF THE
TARIFF ACT OF 1930, AS AMENDED**

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TABLE OF CONTENTS

I.	INTRODUCTION.....	1
II.	COMPLAINANT	3
III.	PROPOSED RESPONDENTS	3
	A. Hisense.....	3
	B. Roku.....	5
IV.	THE TECHNOLOGY AND PRODUCTS-AT-ISSUE.....	6
V.	THE ASSERTED PATENTS AND NON-TECHNICAL DESCRIPTION OF THE INVENTIONS.....	6
	A. U.S. Patent No. 7,965,918.....	6
	1. Identification of the Patent and Ownership by InnoTV	6
	2. Non-Technical Description of the Patent.....	7
	3. Foreign and Domestic Counterparts to the Patent	8
	4. Licenses.....	8
	B. U.S. Patent No. 12,096,066.....	8
	1. Identification of the Patent and Ownership by InnoTV	8
	2. Non-Technical Description of the Patent.....	9
	3. Foreign and Domestic Counterparts to the Patent	9
	4. Licenses.....	9
	C. U.S. Patent No. 10,018,863.....	10
	1. Identification of the Patent and Ownership by InnoTV	10
	2. Non-Technical Description of the Patent.....	10
	3. Foreign and Domestic Counterparts to the Patent	11
	4. Licenses.....	11
	D. U.S. Patent No. RE50,251	11
	1. Identification of the Patent and Ownership by InnoTV	11
	2. Non-Technical Description of the Patent.....	12
	3. Foreign and Domestic Counterparts to the Patent	13
	4. Licenses.....	13
	E. U.S. Patent No. 11,714,306.....	13
	1. Identification of the Patent and Ownership by InnoTV	13

2.	Non-Technical Description of the Patent.....	14
3.	Foreign and Domestic Counterparts to the Patent	14
4.	Licenses.....	15
F.	U.S. Patent No. 12,038,636.....	15
1.	Identification of the Patent and Ownership by InnoTV.....	15
2.	Non-Technical Description of the Patent.....	16
3.	Foreign and Domestic Counterparts to the Patent	16
4.	Licenses.....	16
VI.	UNLAWFUL AND UNFAIR ACTS OF RESPONDENTS	16
A.	Infringement of U.S. Patent No. 7,965,918	16
1.	Hisense.....	16
2.	Roku.....	18
B.	Infringement of U.S. Patent No. 12,096,066	20
1.	Hisense.....	20
2.	Roku.....	21
C.	Infringement of U.S. Patent No. 10,018,863	22
1.	Hisense.....	22
2.	Roku.....	24
D.	Infringement of U.S. Patent No. RE50,251	25
1.	Hisense.....	25
2.	Roku.....	26
E.	Infringement of U.S. Patent No. 11,714,306	27
1.	Hisense.....	27
F.	Infringement of U.S. Patent No. 12,038,636	27
1.	Hisense.....	27
2.	Roku.....	28
VII.	SPECIFIC INSTANCES OF UNFAIR IMPORTATION AND SALE	28
A.	Hisense.....	28
B.	Roku.....	30
VIII.	HARMONIZED TARIFF SCHEDULE ITEM NUMBERS.....	31
IX.	THE DOMESTIC INDUSTRY	31

A.	The Economic Prong of the Domestic Industry Requirement Is Satisfied	32
1.	LG Electronics and Its U.S. Subsidiary	33
2.	LG’s U.S. Investments	33
3.	LG’s Significant Investment in Plant and Equipment	36
4.	LG’s Significant Investment in Labor and/or Capital.....	39
B.	The Technical Prong of the Domestic Industry Requirement Is Satisfied.....	41
X.	RELATED LITIGATIONS	42
XI.	RELIEF REQUESTED.....	42

TABLE OF EXHIBITS

EXHIBIT	DOCUMENT
1.	Certified Copy of U.S. Patent No. 7,965,918
2.	Certified Copy of U.S. Patent No. 12,096,066
3.	Certified Copy of U.S. Patent No. 10,018,863
4.	Certified Copy of U.S. Patent No. RE50,251
5.	Certified Copy of U.S. Patent No. 11,714,306
6.	Certified Copy of U.S. Patent No. 12,038,636
7.	Certified Copy of Recorded Assignments for U.S. Patent No. 7,965,918
8.	Certified Copy of Recorded Assignments for U.S. Patent No. 12,096,066
9.	Certified Copy of Recorded Assignments for U.S. Patent No. 10,018,863
10.	Certified Copy of Recorded Assignments for U.S. Patent No. RE50,251
11.	Certified Copy of Recorded Assignments for U.S. Patent No. 11,714,306
12.	Certified Copy of Recorded Assignments for U.S. Patent No. 12,038,636
13.	“LG Maintains Global & North American Dominance in OLED TV Market,” LG Press Release (June 10, 2025), available at https://www.lg.com/us/press-release/RELEASE - OLED LEADERSHIP FINAL 6-10-2025.pdf
14.	Hisense Global Webpage, “About Us: 2013-2016,” available at https://global.hisense.com/about-hisense/history
15.	Hisense USA Webpage, “Televisions,” available at https://www.hisense-usa.com/category/televisions
16.	Roku Jobs Webpage, “Locations,” available at https://www.weareroku.com/locations
17.	Roku Webpage, “Roku TV,” available at https://www.roku.com/products/roku-tv
18.	Turner Construction Webpage, “LG Electronics USA, Inc. North American Headquarters,” available at https://www.turnerconstruction.com/projects/lg-electronics-usa-inc-north-american-headquarters#:~:text=headquarters%20facility%20located%20on%20a,the%20city%20of%20Englewood%20Cliffs
19.	LG Webpage, “Where to find us,” available at https://www.lg.com/global/mobility/about-our-company/where-to-find-us
20.	List of Foreign and Domestic Counterparts
21.	List of Licensees (CONFIDENTIAL)
22.	Hisense USA Webpage, 50” Class R6 Series 4K UHD Hisense Roku TV, available at https://www.hisense-usa.com/product-page/televisions-50-4k-uhd-roku-tv-50r6e3
23.	Infringement Claim Chart for U.S. Patent No. 7,965,918 Hisense Products
24.	Roku Streaming Stick 4K Quick Start Guide, available at https://image.roku.com/c3VwcG9ydC1B/RSS4K-QSG-US-Fall2022.pdf
25.	Roku TV User Guide (v.10), available at https://image.roku.com/c3VwcG9ydC1B/Roku-TV-User-Guide-10-0-en-US-.pdf

EXHIBIT	DOCUMENT
26.	Infringement Claim Chart for U.S. Patent No. 7,965,918 Roku Products
27.	LG Webpage, “LG Electronics Acquires WebOS From HP to Enhance Smart TV,” available at https://www.lg.com/global/newsroom/news/media-entertainment-solution/lg-electronics-acquires-webos-from-hp-to-enhance-smart-tv/
28.	Domestic Industry Claim Chart for U.S. Patent No. 7,965,918
29.	Infringement Claim Chart for U.S. Patent No. 12,096,066 Hisense Products
30.	Infringement Claim Chart for U.S. Patent No. 12,096,066 Roku Products
31.	Domestic Industry Claim Chart for U.S. Patent No. 12,096,066
32.	Infringement Claim Chart for U.S. Patent No. 10,018,863 Hisense Products
33.	Domestic Industry Claim Chart for U.S. Patent No. 10,018,863
34.	Infringement Claim Chart for U.S. Patent No. RE50,251 Hisense Products
35.	Infringement Claim Chart for U.S. Patent No. RE50,251 Roku Products
36.	Infringement Claim Chart for U.S. Patent No. 11,714,306 Hisense Products
37.	Infringement Claim Chart for U.S. Patent No. 12,038,636 Hisense Products
38.	Infringement Claim Chart for U.S. Patent No. 12,038,636 Roku Products
39.	Domestic Industry Claim Chart for U.S. Patent No. RE50,251
40.	Hisense Webpage, “Authorized Retailers,” available at https://www.hisense-usa.com/authorized-retailers
41.	Hisense 55U8QG Purchase Receipt
42.	Photo of Hisense 55U8QG Mexico label
43.	Hisense 40A4NR Purchase Receipt
44.	Photo of Hisense 40A4NR Mexico label
45.	Hisense 50QD6QF 55U65QF 50QD7QF Purchase Receipt
46.	Photo of Hisense 50QD6QF Mexico label
47.	Roku Form 10-K (2024)
48.	Roku Webpage, “Retail locations,” available at https://www.roku.com/retail
49.	Roku 55R6C7, 40R3C5, and Streaming Stick Plus Purchase Receipts
50.	Photo of Roku 55R6C7 Mexico label
51.	Photo of Roku 40R3C5 China label
52.	Roku Streaming Stick Plus Vietnam Manufacturing Label
53.	Domestic Industry Claim Chart for U.S. Patent No. 11,714,306
54.	Domestic Industry Claim Chart for U.S. Patent No. 12,038,636
55.	LinkedIn Webpage, “Hisense International Co., Ltd,” available at https://www.linkedin.com/company/hisenseinternational/
56.	Forbes Webpage, “Hisense Visual Technology,” available at https://www.forbes.com/companies/hisense-visual-technology/
57.	LinkedIn Webpage, “Hisense USA,” available at https://www.linkedin.com/company/hisense-usa/

EXHIBIT	DOCUMENT
58.	Trademo Webpage, “Hisense Electronics Manufacturing Company of America Corporation,” available at https://www.trademo.com/companies/hisense-electronics-manufacturing-company-of-america-co/25788317
59.	InnoTV-LG Patent Purchase Agreement (CONFIDENTIAL)
60.	LG 2025 Q1 Separate Financial Statements
61.	LG 2024 Q1-Q4 Consolidated Financial Statements
62.	LG Webpage, “Corporate information,” available at https://www.lg.com/global/corporate-info/
63.	LG LinkedIn, “People tab,” available at https://www.linkedin.com/company/lg-electronics-north-america/people/
64.	LG 2021 Q1-Q4 Consolidated Financial Statements
65.	LG 2025 Q1-Q3 Consolidated Financial Statements
66.	LG 2022 Q1-Q4 Consolidated Financial Statements
67.	LG 2023 Q1-Q4 Consolidated Financial Statements
68.	“Fitch Affirms LG Electronics at ‘BBB’; Outlook Stable,” Fitch Ratings (Mar. 25, 2025), available at https://www.fitchratings.com/research/corporate-finance/fitch-affirms-lg-electronics-at-bbb-outlook-stable-25-03-2025
69.	“LG Electronics India, Leading home electronics player: Leading market share in India, especially in the offline channel, riding on the product portfolio, ‘LG’ brand, and pan India sales & service network,” Capital Markets (Oct. 6, 2025), available at https://www.capitalmarket.com/pub/nim/nimshow.asp?code=18787#:~:text=Revenue%20(from%20sales%20of%20products%20&%20services),25.03%25%5Btelevision%2020.21%25%2C%20others%204.82%25%5D%20in%20FY%202025
70.	Hisense Webpage, “Optimism for North American Market, Hisense Officially Announced to Invest 260 Million US Dollars in Building Home Appliance Industrial Park in Mexico,” available at https://global.hisense.com/about-hisense/newsroom/hisense-officially-announced-to-invest-building-home-appliance-industrial-park-in-mexico
71.	Patent Assignment Cover Sheet for recordation of assignment from LG to InnoTV
72.	LG and InnoTV Patent Assignment Agreement (Exhibit B)
73.	Hisense 40A4NR Webpage, available at https://www.hisense-usa.com/product-page/televisions-40-a4-series-hisense-fhd-roku-tv-40a4nr
74.	Hisense 40A4N User Manual, available at https://www.manua.ls/hisense/40a4n/manual
75.	Testing Photos (Hisense 40A4NR) cited in Exhibits 23 and 29
76.	Roku Select Series Webpage, available at https://web.archive.org/web/20251023051812/https://www.roku.com/products/roku-tv/roku-made-tvs/select-series-hd
77.	Testing Photos (Roku 40R3C5) cited in Exhibits 26 and 35

EXHIBIT	DOCUMENT
78.	LG OLED65C5PUA Webpage, available at https://www.lg.com/us/tvs/lg-oled65c5pua-oled-4k-tv
79.	LG OLED65C5PUA Specifications, available at https://www.displayspecifications.com/en/model/6036401e
80.	Testing Photos (LG OLED65C5 2025) cited in Exhibits 28 and 31
81.	DisplaySpecifications Webpage, “2025 Roku Select, Plus, and Pro Series televisions are now available in the U.S.,” available at https://www.displayspecifications.com/en/news/a4d7e3b
82.	Roku Plus Series TVs, available at https://www.roku.com/products/roku-tv/roku-made-tvs/plus-series
83.	Testing Photos (Roku 55R6C7) cited in Exhibits 30 and 38
84.	Hisense Webpage, 55U8QG, available at https://www.hisense-usa.com/product-page/televisions-hisense-55-class-u8-series-miniled-uled-4k-google-tv
85.	Hisense User Manual, available at https://www.hisense-usa.com/files/ugd/991681_6a3fb29c9ae0481aafd5d0f584d295b0.pdf
86.	Testing Photos (Hisense 55U8QG) cited in Exhibits 32 and 36
87.	Testing Photos (LG 55UA7500ZUA) cited in Exhibits 33, 39, and 54
88.	Hisense 50QD6QF Webpage, available at https://www.hisense-usa.com/product-page/televisions-50-class-qd6-series-qlcd-4k-fire-tv-50qd6qf
89.	Testing Photos (Hisense 50QD6QF) cited in Exhibits 34 and 37
90.	Testing Photos (LG 100" QNED85A) cited in Exhibit 53
91.	Roku Form 10-K (2026)
92.	Infringement Claim Chart for U.S. Patent No. 10,018,863 Roku Products

TABLE OF PHYSICAL EXHIBITS

EXHIBIT	DOCUMENT
1.	Roku Streaming Stick Plus

TABLE OF APPENDICES

APPENDIX	DOCUMENT
A.	Certified Prosecution History for U.S. Patent No. 7,965,918
B.	Certified Prosecution History for U.S. Patent No. 12,096,066
C.	Certified Prosecution History for U.S. Patent No. 10,018,863
D.	Certified Prosecution History for U.S. Patent No. RE50,251
E.	Certified Prosecution History for U.S. Patent No. 11,714,306
F.	Certified Prosecution History for U.S. Patent No. 12,038,636
G.	Copy of Prosecution Histories for Priority Application(s) of U.S. Patent No. 7,965,918
H.	Copy of Prosecution Histories for Priority Application(s) of U.S. Patent No. 12,096,066
I.	Copy of Prosecution Histories for Priority Application(s) of U.S. Patent No. 10,018,863
J.	Copy of Prosecution Histories for Priority Application(s) of U.S. Patent No. RE50,251
K.	Copy of Prosecution Histories for Priority Application(s) of U.S. Patent No. 11,714,306
L.	Copy of Prosecution Histories for Priority Application(s) of U.S. Patent No. 12,038,636

I. INTRODUCTION

1.0. InnoTV Labs, LLC (“InnoTV” or “Complainant”) requests that the United States International Trade Commission institute an Investigation pursuant to Section 337 of the Tariff Act of 1930, as amended, 19 U.S.C. § 1337 (“Section 337”), to remedy the unlawful importation, sale for importation, and/or sale after importation by the Proposed Respondents of certain smart televisions, LED televisions, streaming devices, and hardware and software components thereof. These products infringe certain claims of U.S. Patent Nos. 7,965,918 (“’918 Patent”); 12,096,066 (“’066 Patent”); 10,018,863 (“’863 Patent”); RE50,251 (“’251 Patent”); 11,714,306 (“’306 Patent”); and 12,038,636 (“’636 Patent”) (collectively, the “Asserted Patents”) as follows:

U.S. Patent No.	Asserted Claims ¹
7,965,918	3 -8, 10-13, 14 -20, 22, 24
12,096,066	1 , 4-8, 10-11
10,018,863	1 -8, 11-16, 21
RE50,251	1 -3, 10, 25-27, 31- 32 , 36- 37 , 38-39
11,714,306	1 -5, 10-13, 16 -20
12,038,636	1 -5, 9, 11-12, 17, 18 -20, 22, 28

1.1. Certified copies of the Asserted Patents are included as **Exhibits 1-6**. InnoTV holds all rights, title, and interest in and to the ’918, ’066, ’863, ’251, ’306 and ’636 Patents. The Asserted Patents were the product of the research and development activities of LG Electronics Inc. (“LG Electronics”), a leading global developer and supplier of televisions.

1.2. LG Electronics is a leading manufacturer of TVs and has been the world’s No. 1 OLED TV brand for twelve consecutive years—one out of every two OLED TVs sold in North America is an LG TV. **Exhibit 13**. Licensee LG Electronics has a robust existing domestic

¹ Bolded claim numbers designate independent claims.

industry in the United States, as discussed in more detail in Section 9, *infra*.

1.3. The Proposed Respondents are Hisense Co., Ltd., Hisense International Co., Ltd., Hisense Visual Technology Co. Ltd., Hisense USA Corporation, Hisense Electronics Manufacturing Company of America Corporation, and Hisense Monterrey Home Appliance Manufacturing, S. de R.L. de C.V. (collectively “Hisense”); and Roku, Inc., Purple Tag Media Technology (Shanghai) Ltd., Purple Tag Media Technology (Shanghai) Ltd. – Shenzhen Branch, and Purple Tag Mexico, S.A. de C.V. (collectively “Roku”) (collectively “Proposed Respondents”). Hisense and Roku design, develop, manufacture, sell for importation, import into the United States, and/or sell after importation into the United States certain smart televisions, LED televisions, streaming devices, and hardware and software components thereof that infringe InnoTV’s Asserted Patents.

1.4. The Proposed Respondents have implemented LG Electronics’ innovative intellectual property, now owned by InnoTV, into their products without authorization. Each of Hisense and Roku currently designs, uses, tests, manufactures, imports into the United States, sells for importation into the United States, sells in the United States after importation, and/or instructs others regarding the use or manufacture of certain smart televisions, LED televisions, streaming devices, and hardware and software components thereof that directly infringe, contributorily infringe, and/or induce the infringement of, or are made or produced under, or by means of, a process covered by the Asserted Patents.

1.5. Complainant seeks, as relief, a limited exclusion order barring from entry into the United States certain smart televisions, LED televisions, streaming devices, and hardware and software components thereof manufactured by or on behalf of, or imported by or on behalf of the Proposed Respondents that infringe InnoTV’s patents. Complainant also seeks cease and desist

orders prohibiting the sale for importation, importation, sale after importation, distribution, offer for sale, promotion, marketing, advertising, testing, demonstration, warehousing inventory for distribution, solicitation of sales, programming, repairing, maintenance, use, transfer, and other commercial activity relating to infringing certain smart televisions, LED televisions, streaming devices, and hardware and software components thereof. Complainant also seeks imposition of a bond during the Presidential Review Period pursuant to 19 U.S.C. § 1337(j).

1.6. As further set forth below, pursuant to Commission Rule 210.12(a)(6)(i), a domestic industry as defined in 19 U.S.C. § 1337(a)(2) and (3) exists in the United States as the result of licensee LG Electronics' domestic activities related to the technology of the Asserted Patents and products that practice the Asserted Patents.

II. COMPLAINANT

2.1. InnoTV Labs, LLC is a Nevada corporation with a principal place of business at 732 S 6th St # 8058, Las Vegas, NV 89101. InnoTV is a patent management and licensing company, which owns the Asserted Patents by assignment from LG Electronics and has licensed LG Electronics to the Asserted Patents. InnoTV is the sole owner of the Asserted Patents.

III. PROPOSED RESPONDENTS

A. Hisense

3.1. Proposed Respondent Hisense Co., Ltd. is a Chinese corporation with its headquarters at 17 Donghai West Road, Shinan, Qingdao, 266071, China. Hisense has a variety of subsidiaries located around the world. **Exhibit 14.**

3.2. Proposed Respondent Hisense International Co., Ltd. is a Chinese corporation with its headquarters at 218 Qianwangang Road, Economic and Technological Development Zone, Qingdao, 266555, China.

3.3. Proposed Respondent Hisense Visual Technology Co., Ltd. is a Chinese corporation with its headquarters at 218 Qianwangang Road, Economic and Technological Development Zone, Qingdao, 266555, China.

3.4. Proposed Respondent Hisense USA Corporation is a Georgia corporation with its headquarters at 7310 McGinnis Ferry Rd, Suwanee, GA 30024.

3.5. Proposed Respondent Hisense Electronics Manufacturing Company of America Corporation is a Georgia corporation with its headquarters at 7310 McGinnis Ferry Rd, Suwanee, GA 30024.

3.6. Proposed Respondent Hisense Monterrey Home Appliance Manufacturing, S. de R.L. de C.V. is a Mexican corporation with its headquarters at Av. Puerta Grande No. 1301, Hofusan Industrial Park, Salinas Victoria, Nuevo Leon, 65330 México.

3.7. Upon information and belief, the foregoing entities (collectively “Hisense”), on their own and through subsidiaries, design, develop, manufacture, sell for importation, import into the United States, and/or sell after importation into the United States certain smart televisions, LED televisions, streaming devices, and hardware and software components thereof. For instance, Hisense International Co., Ltd. integrates the overseas resources of Hisense Co., Ltd. such as research and development of its products (**Exhibit 55**), and Hisense Visual Technology Co., Ltd. is involved in the production and sale of televisions such as ULED ultra quality television sets. **Exhibit 56.** Hisense USA Corporation was established in 2001 as a Georgia based subsidiary of Hisense Co., Ltd. to focus on product strategy to bring Hisense electronics to the US. **Exhibit 57.** Hisense Electronics Manufacturing Company of America Corporation also further assists with importing televisions (**Exhibit 58**), and Hisense Monterrey Home Appliance Manufacturing, S. de R.L. de C.V. is a manufacturing hub in Mexico. **Exhibit 70.** Upon information and belief, Hisense

designs, develops, manufactures, sells for importation, imports into the United States, and/or sells after importation of certain smart televisions, LED televisions, streaming devices, and hardware and software components thereof. **Exhibit 15.**

B. Roku

3.8. Proposed Respondent Roku, Inc. is a Delaware corporation with its headquarters at 1173 Coleman Avenue, San Jose, CA 95110. Roku, Inc. also provides a mailing address at 1701 Junction Court, Suite 100, San Jose, CA 95112 for legal correspondence. Roku has a variety of subsidiaries located around the world. **Exhibit 16.**

3.9. Proposed Respondent Purple Tag Media Technology (Shanghai) Ltd. is a Chinese corporation with its headquarters at 10/F, Central Park Jing'an, 329 Hengfeng Road, Shanghai, China.

3.10. Proposed Respondent Purple Tag Media Technology (Shanghai) Ltd. – Shenzhen Branch is a Chinese corporation with its headquarters at 5F, China Energy Storage Tower, No.3099 South Keyuan Road, Nanshan District, Shenzhen, Guangdong, China.

3.11. Proposed Respondent Purple Tag Mexico, S.A. de C.V. is a Mexican corporation with its headquarters at Av. P.º de la Reforma 483, Cuauhtémoc, 06500 Ciudad de México, CDMX, México.

3.12. Upon information and belief, the foregoing entities (collectively “Roku”), on their own and through subsidiaries, designs, develops, manufactures, sells for importation, imports into the United States, and/or sells after importation into the United States certain smart televisions, LED televisions, streaming devices, and hardware and software components thereof. For instance, Purple Tag Media Technology (Shanghai) Ltd., Purple Tag Media Technology (Shanghai) Ltd. – Shenzhen Branch, and Purple Tag Mexico, S.A. de C.V. are significant subsidiaries of Roku, Inc. (**Exhibit 91 at 117**) and upon information and belief, have responsibilities including supporting

regional business development, content licensing, and product advertising. Upon information and belief, Roku designs, develops, manufactures, sells for importation, imports into the United States, and/or sells after importation of certain smart televisions, LED televisions, streaming devices, and hardware and software components thereof. **Exhibit 17.**

IV. THE TECHNOLOGY AND PRODUCTS-AT-ISSUE

4.1. Pursuant to 19 C.F.R. § 210.12(a)(12), the category of products accused are certain smart televisions, LED televisions, streaming devices, and hardware and software components thereof.

4.2. Certain exemplary Hisense products (“Hisense Accused Products”) that practice the technology claimed by the Asserted Patents include: 55U8QG, 40A4NR, 50QD6QF, 55U65QF, 85R6E4, 85R6E3, 75R6E4, 70R6E4, 65U6HR, 65R6E4, 58R6E3, 50R6E3, 43R6E3, 43H4030F3, 43A4NR, 40H4030F1, 40A4K, 32H4030F3, 32H4030F1, and 32A4NR.

4.3. Certain exemplary Roku products (“Roku Accused Products”) that practice the technology claimed by the Asserted Patents include: 85R6D5, 55R8C5, 65R8C5, 75R8C5, 55R6C7, 65R6C7, 75R6C7, 65R8B5, 85R4C5, 75R4C5, 65R4C5, 55R4C5, 50R4C5, 43R4C5, 40R3C5, 32R2C5, 32R3C5, Roku Streaming Stick, Roku Streaming Stick Plus, Roku Streaming Stick 4K, Roku Ultra, and Roku Streambar SE.

V. THE ASSERTED PATENTS AND NON-TECHNICAL DESCRIPTION OF THE INVENTIONS²

A. U.S. Patent No. 7,965,918

1. Identification of the Patent and Ownership by InnoTV

5.1. The United States Patent and Trademark Office, after full and fair examination,

² All non-technical descriptions of and categorizations of the patents are for the purposes of providing general information only and should not be interpreted as a representation regarding the scope or applicability of any patent, or the requirements or meaning of any patent claims.

duly and legally issued U.S. Patent No. 7,965,918, titled “IMAGE DISPLAY DEVICE AND IMAGE DISPLAY METHOD,” to inventor Yong Chul Kim on June 21, 2011. *See Exhibit 1*, ’918 Patent. The ’918 Patent issued from Application No. 11/487,422, filed on July 17, 2006. *Id.*

5.2. The ’918 Patent has 3 independent claims and 21 dependent claims. *Id.* InnoTV is asserting claims 3-8, 10-13, 14-20, 22, and 24 of the ’918 Patent in this Investigation. Further investigation and discovery may lead to the assertion of additional claims.

5.3. The Asserted Claims of the ’918 Patent are valid, enforceable, and currently in full force and effect until the expiration of the ’918 Patent on January 18, 2030. InnoTV holds all rights, title, and interest in the ’918 Patent with full rights to enforce the same. **Exhibit 7**, ’918 Patent Assignment. *See also Exhibit 59 at Sections 2(a) – 2(b), 71, 72.*³

5.4. Pursuant to Commission Rule 210.12(c), copies of the certified prosecution history of the ’918 Patent have been submitted with this Complaint as **Appendix E**. Pursuant to Commission Rule 210.12(c), the cited references for the ’918 Patent also have been submitted with this Complaint as **Appendix K**.

2. Non-Technical Description of the Patent

5.5. The ’918 Patent generally relates to an image display device and image display method. Prior art image display devices could not provide a function that allows a user to effectively recognize playing information of video. The ’918 Patent improves on conventional art by addressing this limitation. In particular, the image display method includes receiving a video signal, decoding it, and displaying video corresponding to the decoded signal, displaying a

³ The assignments for the Asserted Patents were filed at the U.S. Patent Office on December 17, 2025. InnoTV has already requested certified copies of the assignments, but the U.S. Patent Office has indicated there is a backlog in assignment orders. InnoTV will supplement its complaint to include certified copies of the assignments for the Asserted Patents once they are delivered.

progress bar overlaid on the video, and displaying thumbnail images of the video above the progress bar. This invention improves the functionality of TV devices by, for example, allowing the user to easily recognize the playing progress state of the video.

3. Foreign and Domestic Counterparts to the Patent

5.6. A list of each foreign patent, each foreign or domestic patent application (not already issued as a patent), and each foreign or domestic patent application that has been denied, abandoned or withdrawn, corresponding to the '918 patent, with an indication of the prosecution status of each such patent application is attached as **Exhibit 20** (List of Foreign and Domestic Counterparts).

4. Licenses

5.7. Pursuant to Commission Rule 210.12(a)(9)(iii), the licensed entities for the '918 Patent are listed in **Exhibit 21** to this Complaint. To InnoTV's knowledge, there are no other licensed entities to the '918 Patent other than those listed in **Exhibit 21**.

B. U.S. Patent No. 12,096,066

1. Identification of the Patent and Ownership by InnoTV

5.8. The United States Patent and Trademark Office, after full and fair examination, duly and legally issued U.S. Patent No. 12,096,066, titled "IMAGE DISPLAY DEVICE AND METHOD FOR CONTROLLING THE SAME," to inventor Jeong Sim Kim on September 17, 2024. *See Exhibit 2*, '066 Patent. The '066 Patent issued from Application No. 18/302,218, filed on April 18, 2023. *Id.*

5.9. The '066 Patent has 1 independent claim and 10 dependent claims. *Id.* InnoTV is asserting claims 1, 4-8, and 10-11 of the '066 Patent in this Investigation. Further investigation and discovery may lead to the assertion of additional claims.

5.10. The Asserted Claims of the '066 Patent are valid, enforceable, and currently in full force and effect until the expiration of the '066 Patent on July 21, 2028. InnoTV holds all rights, title, and interest in the '066 Patent with full rights to enforce the same. **Exhibit 8**, '066 Patent Assignment. *See also* **Exhibit 59 at Sections 2(a) – 2(b), 71, 72.**

5.11. Pursuant to Commission Rule 210.12(c), copies of the certified prosecution history of the '066 Patent have been submitted with this Complaint as **Appendix F**. Pursuant to Commission Rule 210.12(c), the cited references for the '066 Patent also have been submitted with this Complaint as **Appendix L**.

2. Non-Technical Description of the Patent

5.12. The '066 Patent is generally related to an image display device and method for controlling the same. An external device can be connected to the TV using an external interface. A user can view external device information for identifying the external interface to which the device is connected in an external source list menu. A moving image is displayed after receiving a command signal from a remote control, and this moving image is displayed on a position corresponding to the external device information in the menu. This allows the user to easily recognize which external device provides the information of interest.

3. Foreign and Domestic Counterparts to the Patent

5.13. A list of each foreign patent, each foreign or domestic patent application (not already issued as a patent), and each foreign or domestic patent application that has been denied, abandoned or withdrawn, corresponding to the '066 patent, with an indication of the prosecution status of each such patent application is attached as **Exhibit 20** (List of Foreign and Domestic Counterparts).

4. Licenses

5.14. Pursuant to Commission Rule 210.12(a)(9)(iii), the licensed entities for the '066 Patent are listed in **Exhibit 21** to this Complaint. To InnoTV's knowledge, there are no other licensed entities to the '066 Patent other than those listed in **Exhibit 21**.

C. U.S. Patent No. 10,018,863

1. Identification of the Patent and Ownership by InnoTV

5.15. The United States Patent and Trademark Office, after full and fair examination, duly and legally issued U.S. Patent No. 10,018,863, titled "DISPLAY DEVICE COMPRISING A GUIDE PANEL HAVING A BASE THAT IS FIXED TO A DISPLAY PANEL," to inventors Hayun Lee, Bumgi Min, Wansik Kim, Mingeun Jeong, and Cheolsoo Kim on July 10, 2018. *See Exhibit 3*, '863 Patent. The '863 Patent issued from Application No. 15/496,763, filed on April 25, 2017. *Id.*

5.16. The '863 Patent has 2 independent claims and 21 dependent claims. *Id.* InnoTV is asserting claims 1-8, 11-16, and 21 of the '863 Patent in this Investigation. Further investigation and discovery may lead to the assertion of additional claims.

5.17. The Asserted Claims of the '863 Patent are valid, enforceable, and currently in full force and effect until the expiration of the '863 Patent on May 29, 2035. InnoTV holds all rights, title, and interest in the '863 Patent with full rights to enforce the same. **Exhibit 9**, '863 Patent Assignment. *See also Exhibit 59 at Sections 2(a) – 2(b), 71, 72.*

5.18. Pursuant to Commission Rule 210.12(c), copies of the certified prosecution history of the '863 Patent have been submitted with this Complaint as **Appendix A**. Pursuant to Commission Rule 210.12(c), the cited references for the '863 Patent also have been submitted with this Complaint as **Appendix G**.

2. Non-Technical Description of the Patent

5.19. The '863 patent is generally directed to a display device comprising a guide panel having a base that is fixed to a display panel. Among conventional display devices, a liquid crystal display panel includes a liquid crystal layer, and a thin film transistor (TFT) substrate and a color filter substrate which are positioned opposite each other with the liquid crystal layer interposed therebetween. The liquid crystal display panel displays an image using light provided by a backlight unit of the liquid crystal display. The '863 patent improves upon conventional devices by having a guide panel adjacent to an edge of the display panel and extending along a side of the display panel, where the guide panel has a base facing a part of the display panel's rear surface and a side wall extending away from the base in opposite directions. The guide panel also has an inner wall extending away from the base, apart from the side wall, forming a space between the inner wall and the side wall. This structure improves TV devices by, for example, preventing the external force from being transferred to the display panel.

3. Foreign and Domestic Counterparts to the Patent

5.20. A list of each foreign patent, each foreign or domestic patent application (not already issued as a patent), and each foreign or domestic patent application that has been denied, abandoned or withdrawn, corresponding to the '863 patent, with an indication of the prosecution status of each such patent application is attached as **Exhibit 20** (List of Foreign and Domestic Counterparts).

4. Licenses

5.21. Pursuant to Commission Rule 210.12(a)(9)(iii), the licensed entities for the '863 Patent are listed in **Exhibit 21** to this Complaint. To InnoTV's knowledge, there are no other licensed entities to the '863 Patent other than those listed in **Exhibit 21**.

D. U.S. Patent No. RE50,251

1. Identification of the Patent and Ownership by InnoTV

5.22. The United States Patent and Trademark Office, after full and fair examination, duly and legally issued U.S. Patent No. RE50,251, titled “DISPLAY DEVICE,” to inventors Junhee Kong, Hyungu Kim, and Subin Kim on December 31, 2024. *See Exhibit 4*, ’251 Patent. The ’251 Patent is a reissue of U.S. Patent No. 10,126,596 and issued from Application No. 17/097,797, filed on January 12, 2021. *Id.*

5.23. The ’251 Patent has 3 independent claims and 36 dependent claims. *Id.* InnoTV is asserting claims 1-3, 10, 25-27, 31-32, and 36-39 of the ’251 Patent in this Investigation. Further investigation and discovery may lead to the assertion of additional claims.

5.24. The Asserted Claims of the ’251 Patent are valid, enforceable, and currently in full force and effect until the expiration of the ’251 Patent on April 4, 2036. InnoTV holds all rights, title, and interest in the ’251 Patent with full rights to enforce the same. **Exhibit 10**, ’251 Patent Assignment. *See also Exhibit 59 at Sections 2(a) – 2(b), 71, 72.*

5.25. Pursuant to Commission Rule 210.12(c), copies of the certified prosecution history of the ’251 Patent have been submitted with this Complaint as **Appendix B**. Pursuant to Commission Rule 210.12(c), the cited references for the ’251 Patent also have been submitted with this Complaint as **Appendix H**.

2. Non-Technical Description of the Patent

5.26. The ’251 Patent is generally directed to a display device. In conventional display devices, a liquid crystal display panel includes a liquid crystal layer, a thin film transistor (TFT) substrate and a color filter substrate which are positioned opposite each other with the liquid crystal layer interposed therebetween. The liquid crystal display panel displays an image using light provided by a backlight unit of the liquid crystal display. The ’251 Patent improves on prior art by, *inter alia*, including a display panel, a diffusion plate positioned behind the display panel, a reflecting sheet configured to be positioned behind the diffusion plate, a frame configured to be

positioned behind the reflecting sheet, and a supporter configured to be positioned between the diffusion plate and the reflecting sheet so that the diffusion plate and the reflecting sheet are spaced apart from each other and to have an elastic portion that at least partially deforms upon deformation of the diffusion plate. Particularly, the supporter may further include at least one first supporting portion configured to be provided on the elastic portion and to extend in the direction of the diffusion plate so that the tip comes into contact with the diffusion plate. The claimed invention improves performance and manufacture, improving the performance of a TV device as a whole by, for example, preventing damage to the diffusion plate in contact with the supporter.

3. Foreign and Domestic Counterparts to the Patent

5.27. A list of each foreign patent, each foreign or domestic patent application (not already issued as a patent), and each foreign or domestic patent application that has been denied, abandoned or withdrawn, corresponding to the '251 patent, with an indication of the prosecution status of each such patent application is attached as **Exhibit 20** (List of Foreign and Domestic Counterparts).

4. Licenses

5.28. Pursuant to Commission Rule 210.12(a)(9)(iii), the licensed entities for the '251 Patent are listed in **Exhibit 21** to this Complaint. To InnoTV's knowledge, there are no other licensed entities to the '251 Patent other than those listed in **Exhibit 21**.

E. U.S. Patent No. 11,714,306

1. Identification of the Patent and Ownership by InnoTV

5.29. The United States Patent and Trademark Office, after full and fair examination, duly and legally issued U.S. Patent No. 11,714,306, titled "DISPLAY DEVICE," to inventors Hyojin Won and Yongho Lee on August 1, 2023. *See Exhibit 5*, '306 Patent. The '306 Patent issued from Application No. 17/978,858, filed on November 1, 2022. *Id.*

5.30. The '306 Patent has 2 independent claims and 18 dependent claims. *Id.* InnoTV is asserting claim 1-5, 10-13, and 16-20 of the '306 Patent in this Investigation. Further investigation and discovery may lead to the assertion of additional claims.

5.31. The Asserted Claims of the '306 Patent are valid, enforceable, and currently in full force and effect until the expiration of the '306 Patent on December 28, 2036. InnoTV holds all rights, title, and interest in the '306 Patent with full rights to enforce the same. **Exhibit 11**, '306 Patent Assignment. *See also Exhibit 59 at Sections 2(a) – 2(b), 71, 72.*

5.32. Pursuant to Commission Rule 210.12(c), copies of the certified prosecution history of the '306 Patent have been submitted with this Complaint as **Appendix C**. Pursuant to Commission Rule 210.12(c), the cited references for the '306 Patent also have been submitted with this Complaint as **Appendix I**.

2. Non-Technical Description of the Patent

5.33. The '306 Patent is generally related to a display device. In conventional display devices, a liquid crystal display panel includes a liquid crystal layer, and a thin film transistor (TFT) substrate and a color filter substrate which are positioned opposite each other with the liquid crystal layer interposed therebetween. The liquid crystal display panel displays an image using light provided by a backlight unit of the liquid crystal display. The display device of the invention includes a display panel, a main frame, a side frame arranged to overcome manufacturing challenges and improves TV devices by, for example, providing a display device having a thin profile and a rigidity structure.

3. Foreign and Domestic Counterparts to the Patent

5.34. A list of each foreign patent, each foreign or domestic patent application (not already issued as a patent), and each foreign or domestic patent application that has been denied, abandoned or withdrawn, corresponding to the '306 patent, with an indication of the prosecution

status of each such patent application is attached as **Exhibit 20** (List of Foreign and Domestic Counterparts).

4. Licenses

5.35. Pursuant to Commission Rule 210.12(a)(9)(iii), the licensed entities for the '306 Patent are listed in **Exhibit 21** to this Complaint. To InnoTV's knowledge, there are no other licensed entities to the '306 Patent other than those listed in **Exhibit 21**.

F. U.S. Patent No. 12,038,636

1. Identification of the Patent and Ownership by InnoTV

5.36. The United States Patent and Trademark Office, after full and fair examination, duly and legally issued U.S. Patent No. 12,038,636, titled "DISPLAY DEVICE," to inventors Hyongil Kil and Sangmin Baek on July 16, 2024. *See Exhibit 6*, '636 Patent. The '636 Patent issued from Application No. 18/181,411, filed on March 9, 2023. *Id.*

5.37. The '636 Patent has 2 independent claims and 26 dependent claims. *Id.* InnoTV is asserting claims 1-5, 9, 11-12, 17-20, 22, and 28 of the '636 Patent in this Investigation. Further investigation and discovery may lead to the assertion of additional claims.

5.38. The Asserted Claims of the '636 Patent are valid, enforceable, and currently in full force and effect until the expiration of the '636 Patent on November 29, 2038. InnoTV holds all rights, title, and interest in the '636 Patent with full rights to enforce the same. **Exhibit 12**, '636 Patent Assignment. *See also Exhibit 59 at Sections 2(a) – 2(b), 71, 72.*

5.39. Pursuant to Commission Rule 210.12(c), copies of the certified prosecution history of the '636 Patent have been submitted with this Complaint as **Appendix D**. Pursuant to Commission Rule 210.12(c), the cited references for the '636 Patent also have been submitted with this Complaint as **Appendix J**.

2. Non-Technical Description of the Patent

5.40. The '636 Patent is generally related to display device. This display device has a display panel, a frame, light sources mounted on a substrate, and a reflective sheet. The '636 Patent teaches a frame that includes flat and inclined portions, and a protrusion from the frame toward the display panel that passes through the reflective sheet. This structure overcomes manufacturing challenges and improves TV devices by, for example, providing a display device with a reduced thickness and a structure capable of increasing efficiency of an assembly process.

3. Foreign and Domestic Counterparts to the Patent

5.41. A list of each foreign patent, each foreign or domestic patent application (not already issued as a patent), and each foreign or domestic patent application that has been denied, abandoned or withdrawn, corresponding to the '636 patent, with an indication of the prosecution status of each such patent application is attached as **Exhibit 20** (List of Foreign Counterparts).

4. Licenses

5.42. Pursuant to Commission Rule 210.12(a)(9)(iii), the licensed entities for the '636 Patent are listed in **Exhibit 21** to this Complaint. To InnoTV's knowledge, there are no other licensed entities to the '636 Patent other than those listed in **Exhibit 21**.

VI. UNLAWFUL AND UNFAIR ACTS OF RESPONDENTS

A. Infringement of U.S. Patent No. 7,965,918

1. Hisense

6.1. On information and belief, Hisense imports, sells for importation, and/or sells after importation into the United States, Accused Products that infringe the '918 Patent, literally or under the doctrine of equivalents.

6.2. The Accused Products include at least the following products that infringe at least claims 3-8, 10-20, 22, and 24 of the '918 Patent, literally or under the doctrine of equivalents:

85R6E4, 85R6E3, 75R6E4, 70R6E4, 65U6HR, 65R6E4, 58R6E3, 50R6E3, 43R6E3, 43H4030F3, 43A4NR, 40A4NR, 40H4030F1, 40A4K, 32H4030F3, 32A4NR, and 32H4030F1 (collectively, the “’918 Hisense Accused Products”). Complainant has not yet had the benefit of discovery, and thus this identification of models or types of products is not intended to limit the scope of the investigation. Any remedy should extend to all infringing products.

6.3. On information and belief, Hisense knowingly and intentionally induces users of one or more of the Accused Products to directly infringe one or more claims of the ’918 Patent by encouraging, instructing, and/or aiding one or more persons in the United States, including but not limited to Hisense employees who test and operate the Accused Products at the direction of Hisense, to use (including testing those devices and methods), make, sell, or offer to sell one or more of the Accused Products, during or after such article’s importation into the United States, in a manner that infringes the ’918 Patent. On information and belief, Hisense was aware of the ’918 Patent or acted with willful blindness as to its existence at least as a result of the filing of this Complaint. On information and belief, Hisense knew or should have known that its encouraging, instructing and/or aiding of users of one or more of the Accused Products in the United States in a manner that infringes the ’918 Patent, including but not limited to Hisense employees who test and operate Accused Products at the direction of Hisense, to use (including testing those devices and methods), make, sell, or offer to sell one or more of the Accused Products during or after such article’s importation into the United States, would result in direct infringement and intended to cause those acts which constitute that direct infringement.

6.4. For example, Hisense provides significant support and documentation, such as manuals, guides, webpages, and videos that demonstrate how the ’918 Hisense Accused Products can be used in an infringing manner. *See e.g., Exhibit 22.* Through its webpages, manuals, and

other documentation promoting its TV products, Hisense encourages and instructs its customers to use its products in a manner that infringes the '918 Patent. *Id.*

6.5. Additionally, Hisense induces infringement of the '918 Patent by its customers by configuring the '918 Hisense Accused Products to operate in a manner that Hisense knows infringes the '918 Patent. Hisense further provides its customers with all the requisite hardware, software, documentation, and instructions to operate the '918 Hisense Accused Products in an infringing manner. For example, Hisense provides the '918 Hisense Accused Products to customers and, upon information and belief, encourages and instructs those customers to use the Hisense products by making available to them the aforementioned resources and documentation, design tools, manuals, user guides and the like.

6.6. A representative claim chart comparing certain claims of the '918 Patent to the '918 Hisense Accused Products is attached as **Exhibit 23**.

2. Roku

6.7. On information and belief, Roku imports, sells for importation, and/or sells after importation into the United States, Accused Products that infringe the '918 Patent, literally or under the doctrine of equivalents.

6.8. On information and belief, the Accused Products include at least the following products that infringe at least claims 3-8, 10-20, 22, and 24 of the '918 Patent, literally or under the doctrine of equivalents (collectively, the "'918 Roku Accused Products"): 55R8C5, 65R8C5, 75R8C5, 55R6C7, 65R6C7, 75R6C7, 65R8B5, 85R4C5, 75R4C5, 65R4C5, 55R4C5, 50R4C5, 43R4C5, 40R3C5, 32R2C5, 32R3C5, Roku Streaming Stick, Roku Streaming Stick Plus, Roku Streaming Stick 4K, Roku Ultra, and Roku Streambar SE. Complainant has not yet had the benefit of discovery, and thus this identification of models or types of products is not intended to limit the scope of the investigation. Any remedy should extend to all infringing products.

6.9. On information and belief, Roku knowingly and intentionally induces users of one or more of the Accused Products to directly infringe one or more claims of the '918 Patent by encouraging, instructing, and/or aiding one or more persons in the United States, including but not limited to Roku employees who test and operate the Accused Products at the direction of Roku, to use (including testing those devices and methods), make, sell, or offer to sell one or more of the Accused Products, during or after such article's importation into the United States, in a manner that infringes the '918 Patent. On information and belief, Roku was aware of the '918 Patent or acted with willful blindness as to its existence at least as a result of the filing of this Complaint. On information and belief, Roku knew or should have known that its encouraging, instructing and/or aiding of users of one or more of the Accused Products in the United States in a manner that infringes the '918 Patent, including but not limited to Roku employees who test and operate Accused Products at the direction of Roku, to use (including testing those devices and methods), make, sell, or offer to sell one or more of the Accused Products during or after such article's importation into the United States, would result in direct infringement and intended to cause those acts which constitute that direct infringement.

6.10. For example, Roku provides significant support and documentation, such as manuals, guides, webpages, and videos that demonstrate how the '918 Roku Accused Products can be used in an infringing manner. *See e.g., Exhibits 24, 25.* Through its webpages, manuals, and other documentation promoting its TV products, Roku encourages and instructs its customers to use its products in a manner that infringes the '918 Patent. *Id.*

6.11. Additionally, Roku induces infringement of the '918 Patent by its customers by configuring the '918 Roku Accused Products to operate in a manner that Roku knows infringes the '918 Patent. Roku further provides its customers with all the requisite hardware, software,

documentation, and instructions to operate the '918 Roku Accused Products in an infringing manner. For example, Roku provides the '918 Roku Accused Products to customers and, upon information and belief, encourages and instructs those customers to use the Roku products by making available to them the aforementioned resources and documentation, design tools, manuals, user guides and the like.

6.12. On information and belief, Roku contributes to the infringement of the '918 Patent by offering to sell or selling and/or importing a patented component, constituting a material part of the invention, knowing the same to be especially made or especially adapted for use in an infringement and not a staple article or commodity of commerce suitable for substantial non-infringing use. The Accused Products are a material part of practicing at least the Asserted Claims of the '918 Patent, have no substantial non-infringing uses, are not a staple article of commerce, and are especially made and adapted for use in an infringing manner. For example, the streaming players of the '918 Roku Accused Products are specifically manufactured and designed and intended to receive a video signal, decode a video signal, and display a progress bar and corresponding thumbnail images.

6.13. A representative claim chart comparing certain claims of the '918 Patent to the '918 Roku Accused Products is attached as **Exhibit 26**.

B. Infringement of U.S. Patent No. 12,096,066

1. Hisense

6.14. On information and belief, Hisense imports, sells for importation, and/or sells after importation into the United States, Accused Products that infringe the '066 Patent, literally or under the doctrine of equivalents.

6.15. The Accused Products include at least the following products that infringe at least claims 1, 4-8, and 10-11 of the '066 Patent, literally or under the doctrine of equivalents: 85R6E4,

85R6E3, 75R6E4, 70R6E4, 65U6HR, 65R6E4, 58R6E3, 50R6E3, 43R6E3, 43H4030F3, 43A4NR, 40A4NR, 40H4030F1, 40A4K, 32H4030F3, 32A4NR, and 32H4030F1 (collectively, the “’066 Hisense Accused Products”). Complainant has not yet had the benefit of discovery, and thus this identification of models or types of products is not intended to limit the scope of the investigation. Any remedy should extend to all infringing products.

6.16. On information and belief, Hisense knowingly and intentionally induces infringement of the ’066 Patent for the same reasons explained above for the ’918 Patent.

6.17. A representative claim chart comparing certain claims of the ’066 Patent to the ’066 Hisense Accused Products is attached as **Exhibit 29**.

2. Roku

6.18. On information and belief, Roku imports, sells for importation, and/or sells after importation into the United States, Accused Products that infringe the ’066 Patent, literally or under the doctrine of equivalents.

6.19. On information and belief, the Accused Products include at least the following products that infringe at least claims 1, 4-8, and 10-11 of the ’066 Patent, literally or under the doctrine of equivalents (collectively, the “’066 Roku Accused Products”): 55R8C5, 65R8C5, 75R8C5, 55R6C7, 65R6C7, 75R6C7, 65R8B5, 85R4C5, 75R4C5, 65R4C5, 55R4C5, 50R4C5, 43R4C5, 40R3C5, 32R2C5, 32R3C5, Roku Streaming Stick, Roku Streaming Stick Plus, Roku Streaming Stick 4K, Roku Ultra, and Roku Streambar SE. Complainant has not yet had the benefit of discovery, and thus this identification of models or types of products is not intended to limit the scope of the investigation. Any remedy should extend to all infringing products.

6.20. On information and belief, Roku knowingly and intentionally induces and contributes to the infringement of the ’066 Patent for the same reasons explained above for the ’918 Patent. Further, the Accused Products are a material part of practicing at least the Asserted

Claims of the '066 Patent, have no substantial non-infringing uses, are not a staple article of commerce, and are especially made and adapted for use in an infringing manner. For example, the streaming players of the '066 Roku Accused Products are specifically manufactured and designed and intended to provide an external interface configured to display an external source list menu including external device information, based on the image display device being connected to the external device, display a moving image as the external device information wherein the moving image is displayed after receiving a command signal from the remote controller.

6.21. A representative claim chart comparing certain claims of the '066 Patent to the '066 Roku Accused Products is attached as **Exhibit 30**.

C. Infringement of U.S. Patent No. 10,018,863

1. Hisense

6.22. On information and belief, Hisense imports, sells for importation, and/or sells after importation into the United States, Accused Products that infringe the '863 Patent, literally or under the doctrine of equivalents.

6.23. The Accused Products include at least the following products that infringe at least claims 1-8, 11-16, and 21 of the '863 Patent, literally or under the doctrine of equivalents: 55U8QG (collectively, the "'863 Hisense Accused Products"). Complainant has not yet had the benefit of discovery, and thus this identification of models or types of products is not intended to limit the scope of the investigation. Any remedy should extend to all infringing products.

6.24. On information and belief, Hisense knowingly and intentionally induces users of one or more of the Accused Products to directly infringe one or more claims of the '863 Patent by encouraging, instructing, and/or aiding one or more persons in the United States, including but not limited to Hisense employees who test and operate the Accused Products at the direction of Hisense, to use (including testing those devices and methods), make, sell, or offer to sell one or

more of the Accused Products, during or after such article's importation into the United States, in a manner that infringes the '863 Patent. On information and belief, Hisense was aware of the '863 Patent or acted with willful blindness as to its existence at least as a result of the filing of this Complaint. On information and belief, Hisense knew or should have known that its encouraging, instructing and/or aiding of users of one or more of the Accused Products in the United States in a manner that infringes the '863 Patent, including but not limited to Hisense employees who test and operate Accused Products at the direction of Hisense, to use (including testing those devices and methods), make, sell, or offer to sell one or more of the Accused Products during or after such article's importation into the United States, would result in direct infringement and intended to cause those acts which constitute that direct infringement.

6.25. For example, Hisense provides significant support and documentation, such as manuals, guides, webpages, and videos that demonstrate how the '863 Hisense Accused Products can be used in an infringing manner. *See e.g., Exhibit 22.* Through its webpages, manuals, and other documentation promoting its TV products, Hisense encourages and instructs its customers to use its products in a manner that infringes the '863 Patent. *Id.*

6.26. Additionally, Hisense induces infringement of the '863 Patent by its customers by configuring the '863 Hisense Accused Products to operate in a manner that Hisense knows infringes the '863 Patent. Hisense further provides its customers with all the requisite hardware, software, documentation, and instructions to operate the '863 Hisense Accused Products in an infringing manner. For example, Hisense provides the '863 Hisense Accused Products to customers and, upon information and belief, encourages and instructs those customers to use the Hisense products by making available to them the aforementioned resources and documentation, design tools, manuals, user guides and the like.

6.27. A representative claim chart comparing certain claims of the '863 Patent to the '863 Hisense Accused Products is attached as **Exhibit 32**.

2. Roku

6.28. On information and belief, Roku imports, sells for importation, and/or sells after importation into the United States, Accused Products that infringe the '863 Patent, literally or under the doctrine of equivalents.

6.29. On information and belief, the Accused Products include at least the following products that infringe at least claims 1, 3-8, and 12-16 of the '863 Patent, literally or under the doctrine of equivalents: 85R6D5 and 85R4C5 (collectively, the "'863 Roku Accused Products"). Complainant has not yet had the benefit of discovery into Roku's full infringement of the '863 Patent, and thus this identification of models or types of products is not intended to limit the scope of the investigation. Any remedy should extend to all infringing products.

6.30. On information and belief, Roku knowingly and intentionally induces users of one or more of the Accused Products to directly infringe one or more claims of the '863 Patent by encouraging, instructing, and/or aiding one or more persons in the United States, including but not limited to Roku employees who test and operate the Accused Products at the direction of Roku, to use (including testing those devices and methods), make, sell, or offer to sell one or more of the Accused Products, during or after such article's importation into the United States, in a manner that infringes the '863 Patent. On information and belief, Roku was aware of the '863 Patent or acted with willful blindness as to its existence at least as a result of the filing of this Complaint. On information and belief, Roku knew or should have known that its encouraging, instructing and/or aiding of users of one or more of the Accused Products in the United States in a manner that infringes the '863 Patent, including but not limited to Roku employees who test and operate Accused Products at the direction of Roku, to use (including testing those devices and methods),

make, sell, or offer to sell one or more of the Accused Products during or after such article's importation into the United States, would result in direct infringement and intended to cause those acts which constitute that direct infringement.

6.31. For example, Roku provides significant support and documentation, such as manuals, guides, webpages, and videos that demonstrate how the '863 Roku Accused Products can be used in an infringing manner. *See e.g., Exhibit 25.* Through its webpages, manuals, and other documentation promoting its TV products, Roku encourages and instructs its customers to use its products in a manner that infringes the '863 Patent. *Id.*

6.32. Additionally, Roku induces infringement of the '863 Patent by its customers by configuring the '863 Roku Accused Products to operate in a manner that Roku knows infringes the '863 Patent. Roku further provides its customers with all the requisite hardware, software, documentation, and instructions to operate the '863 Roku Accused Products in an infringing manner. For example, Roku provides the '863 Roku Accused Products to customers and, upon information and belief, encourages and instructs those customers to use the Roku products by making available to them the aforementioned resources and documentation, design tools, manuals, user guides and the like.

6.33. A representative claim chart comparing certain claims of the '863 Patent to the '863 Roku Accused Products is attached as **Exhibit 92**.

D. Infringement of U.S. Patent No. RE50,251

1. Hisense

6.34. On information and belief, Hisense imports, sells for importation, and/or sells after importation into the United States, Accused Products that infringe the '251 Patent, literally or under the doctrine of equivalents.

6.35. On information and belief, the Accused Products include at least the following products that infringe at least claims 37-39 of the '251 Patent, literally or under the doctrine of equivalents: 50QD6QF and 55U65QF (collectively, the "'251 Hisense Accused Products"). Complainant has not yet had the benefit of discovery, and thus this identification of models or types of products is not intended to limit the scope of the investigation. Any remedy should extend to all infringing products.

6.36. On information and belief, Hisense knowingly and intentionally induces infringement of the '251 Patent for the same reasons explained above for the '863 Patent.

6.37. A representative claim chart comparing certain claims of the '251 Patent to the '251 Hisense Accused Products is attached as **Exhibit 34**.

2. Roku

6.38. On information and belief, Roku imports, sells for importation, and/or sells after importation into the United States, Accused Products that infringe the '251 Patent, literally or under the doctrine of equivalents.

6.39. On information and belief, the Accused Products include at least the following products that infringe at least claims 1-3, 10, 25-27, 31-32, and 36-39 of the '251 Patent, literally or under the doctrine of equivalents: 55R6C7 and 40R3C5 (collectively, the "'251 Roku Accused Products"). Complainant has not yet had the benefit of discovery, and thus this identification of models or types of products is not intended to limit the scope of the investigation. Any remedy should extend to all infringing products.

6.40. On information and belief, Roku knowingly and intentionally induces infringement of the '251 Patent for the same reasons explained above for the '863 Patent.

6.41. A representative claim chart comparing certain claims of the '251 Patent to the '251 Roku Accused Products is attached as **Exhibit 35**.

E. Infringement of U.S. Patent No. 11,714,306

1. Hisense

6.42. On information and belief, Hisense imports, sells for importation, and/or sells after importation into the United States, Accused Products that infringe the '306 Patent, literally or under the doctrine of equivalents.

6.43. The Accused Products include at least the following products that infringe at least claims 1-5, 10-13, 16-20 of the '306 Patent, literally or under the doctrine of equivalents: 55U8QG (collectively, the "'306 Hisense Accused Products"). Complainant has not yet had the benefit of discovery, and thus this identification of models or types of products is not intended to limit the scope of the investigation. Any remedy should extend to all infringing products.

6.44. On information and belief, Hisense knowingly and intentionally induces infringement of the '306 Patent for the same reasons explained above for the '863 Patent.

6.45. A representative claim chart comparing certain claims of the '306 Patent to the '306 Hisense Accused Products is attached as **Exhibit 36**.

F. Infringement of U.S. Patent No. 12,038,636

1. Hisense

6.46. On information and belief, Hisense imports, sells for importation, and/or sells after importation into the United States, Accused Products that infringe the '636 Patent, literally or under the doctrine of equivalents.

6.47. The Accused Products include at least the following products that infringe at least claims 1-5, 9, 11-12, 17-20, 22, and 28 of the '636 Patent, literally or under the doctrine of equivalents: 50QD6QF and 55U65QF (collectively, the "'636 Hisense Accused Products"). Complainant has not yet had the benefit of discovery, and thus this identification of models or

types of products is not intended to limit the scope of the investigation. Any remedy should extend to all infringing products.

6.48. On information and belief, Hisense knowingly and intentionally induces infringement of the '636 Patent for the same reasons explained above for the '863 Patent.

6.49. A representative claim chart comparing certain claims of the '636 Patent to the '636 Hisense Accused Products is attached as **Exhibit 37**.

2. Roku

6.50. On information and belief, Roku imports, sells for importation, and/or sells after importation into the United States, Accused Products that infringe the '636 Patent, literally or under the doctrine of equivalents.

6.51. On information and belief, the Accused Products include at least the following products that infringe at least claims 1-5, 9, 11-12, 17-20, 22, and 28 of the '636 Patent, literally or under the doctrine of equivalents: 55R6C7 (collectively, the "'636 Roku Accused Products"). Complainant has not yet had the benefit of discovery, and thus this identification of models or types of products is not intended to limit the scope of the investigation. Any remedy should extend to all infringing products.

6.52. On information and belief, Roku knowingly and intentionally induces infringement of the '636 Patent for the same reasons explained above for the '863 Patent.

6.53. A representative claim chart comparing certain claims of the '636 Patent to the '636 Roku Accused Products is attached as **Exhibit 38**.

VII. SPECIFIC INSTANCES OF UNFAIR IMPORTATION AND SALE

A. Hisense

7.1. On information and belief, Hisense is importing, selling for importation, and/or selling within the United States after importation, certain TV devices. The specific instances set

forth below are representative examples of Hisense's unlawful importation, sale for importation, and/or sales within the United States after importation of infringing products.

7.2. Hisense's Accused Products are manufactured and/or assembled at foreign facilities. *See Exhibit 14.* The Hisense Accused Products are then sold for importation into the United States, imported into the United States, and/or sold within the United States after importation by Hisense and authorized retailers and distributors.

7.3. A large number of models of Hisense's Accused Products are available for purchase in the United States. For example, as shown on Hisense's website, many models of Hisense's Accused Products are available for purchase in the United States through Hisense's authorized distributors. **Exhibit 40.**

7.4. Many models of Hisense's Accused Products are also available for purchase in the United States through various third parties, both in-store and through their websites, including Amazon, Best Buy, Costco, Electronic Express, Lowe's, Sam's Club, Target, and Walmart. *Id.*

7.5. The Hisense 55U8QG is sold in the United States, for example, at Best Buy. **Exhibit 41.** A Hisense 55U8QG was bought in the United States in Maryland in 2025. **Exhibit 41.** The purchased Hisense 55U8QG further confirms it was manufactured in Mexico. **Exhibit 42.**

7.6. The Hisense 40A4NR is sold in the United States, for example, at Amazon.com. **Exhibit 43.** A Hisense 40A4NR was bought in the United States in Maryland in 2025. **Exhibit 43.** The purchased Hisense 40A4NR further confirms it was manufactured in Mexico. **Exhibit 44.**

7.7. The Hisense 50QD6QF is sold in the United States, for example, at Best Buy. **Exhibit 45.** A Hisense 50QD6QF was bought in the United States in Maryland in 2025. **Exhibit**

45. The purchased Hisense 50QD6QF further confirms it was manufactured in Mexico. **Exhibit 46.**

B. Roku

7.8. On information and belief, Roku is importing, selling for importation, and/or selling within the United States after importation, certain TV devices and streaming players. The specific instances set forth below are representative examples of Roku's unlawful importation, sale for importation, and/or sales within the United States after importation of infringing products.

7.9. Roku's Accused Products are manufactured and/or assembled at foreign facilities. *See Exhibit 47 at 5* (Manufacturing). The Roku Accused Products are then sold for importation into the United States, imported into the United States, and/or sold within the United States after importation by Roku and authorized retailers and distributors.

7.10. A large number of models of Roku's Accused Products are available for purchase in the United States. For example, as shown on Roku's website, many models of Roku's Accused Products are available for purchase in the United States through Roku's authorized distributors. **Exhibit 48.**

7.11. Many models of Roku's Accused Products are also available for purchase in the United States through various third parties, both in-store and through their websites, including Amazon, Best Buy, Costco, Electronic Express, Sam's Club, Target, and Walmart. *Id.*

7.12. The Roku 55R6C7 is sold in the United States, for example, at Best Buy. **Exhibit 49.** A Roku 55R6C7 was bought in the United States in Maryland in 2025. **Exhibit 49.** The purchased Roku 55R6C7 further confirms it was manufactured in Mexico. **Exhibit 50.**

7.13. The Roku 40R3C5 is sold in the United States, for example, at Best Buy. **Exhibit 49.** A Roku 40R3C5 was bought in the United States in Maryland in 2025. **Exhibit 49.** The purchased Roku 40R3C5 further confirms it was manufactured in China. **Exhibit 51.**

7.14. The Roku Streaming Stick Plus is sold in the United States, for example, at Best Buy. **Exhibit 49.** A Roku Streaming Stick Plus was bought in the United States in Maryland in 2025. **Exhibit 49.** The purchased Roku Streaming Stick Plus further confirms it was manufactured in Vietnam. **Exhibit 52.**

VIII. HARMONIZED TARIFF SCHEDULE ITEM NUMBERS

8.1. On information and belief, the Harmonized Tariff Schedule of the United States item numbers under which the infringing certain smart televisions, LED televisions, streaming devices, and hardware and software components thereof containing the same may be imported into the United States include at least HTSUS 8528.72.7240; HTSUS 8528.72.6460; HTSUS 8528.72.3300; HTSUS 8528.72.6440; HTSUS 8525.50.1000; HTSUS 8525.50.3000. These classifications are intended for illustration only and are not intended to be restrictive of the accused products or of products subject to the relief requested.

IX. THE DOMESTIC INDUSTRY

9.1. In accordance with Section 337(a)(2) and (a)(3), a domestic industry exists in the United States in connection with the Asserted Patents comprising significant investments in plant and equipment, and significant employment of labor and capital in the United States in products that practice the Asserted Patents. The Asserted Patents are practiced by at least the following Domestic Industry Products:

U.S. Patent No.	Domestic Industry Products
7,965,918	M5, G5, C5, B5, QNED9M, QNED93, QNED92A, QNED87, QNED86, QNED85A, QNED84, QNED82A, QNED80, QNED70A, UA77, UA7050, UA7000, UA75, UA73, and NANO80A Series
12,096,066	M5, G5, C5, B5, QNED9M, QNED93, QNED92A, QNED87, QNED86, QNED85A, QNED84, QNED82A, QNED80, QNED70A, UA77, UA7050, UA7000, UA75, UA73, and NANO80A Series
10,018,863	UP73 and UA75 Series

U.S. Patent No.	Domestic Industry Products
RE50,251	M5, G5, C5, B5, QNED9M, QNED93, QNED92A, QNED87, QNED86, QNED85A, QNED84, QNED82A, QNED80, QNED70A, UA77, UA7050, UA7000, UA75, UA73, and NANO80A Series B4, C4, G4, M4, QNED99, QNED80, QNED86, QNED89, QNED91, NANO81, NANO82, UT73, UT80, UT81, and UT91 Series
11,714,306	86QNED99TUA, 75QNED99TUA, 100QNED85AU
12,038,636	UM73 and UA75 Series

A. The Economic Prong of the Domestic Industry Requirement Is Satisfied

9.2. Pursuant to Commission Rule 210.12(a)(6)(i), a domestic industry as defined in Section 337(a)(3) exists in the United States as the result of licensee LG Electronics' and its U.S. subsidiary's domestic activities related to the technology of the Asserted Patents and products that practice the Asserted Patents. InnoTV plans to promptly subpoena LG Electronics to obtain discovery supporting its domestic industry allegations.

9.3. Pursuant to Commission Rule 210.12(a)(9)(iv), Complainant has attached a copy of the agreement that includes a license from InnoTV to LG Electronics. **Confidential Exhibit 59.**

9.4. As set forth below, licensee LG Electronics has made significant investments in (i) plant and equipment, and (ii) labor or capital in the United States. These investments relate to, among other things, the design, research and development, engineering, testing, regulatory compliance, sales, marketing, distribution, warehousing, quality control, warranty and repair, and customer service and support of the Domestic Industry Products. These significant investments have continued in 2025 since InnoTV's acquisition of the Asserted Patents and through the filing of the complaint at materially similar scope, and are expected to continue into the future.

1. LG Electronics and Its U.S. Subsidiary

9.5. LG Electronics is a corporation based in Korea with headquarters in LG Twin Tower 128, Yeoui-daero, Yeongdeungpo-gu, Seoul, Korea. LG Electronics has several U.S. subsidiaries, including LG Electronics U.S.A., Inc. (“LGEUS”). **Exhibit 60 at 21.**

9.6. LGEUS is a company involved in the production and sales of LG Electronics’ products. **Exhibit 61 at 13.** LGEUS is located at 111 Sylvan Ave, Englewood Cliffs, NJ 07632.

9.7. LG Electronics and LGEUS (hereinafter collectively “LG”) design, develop, manufacture, and/or sell domestic industry products that practice the technology claimed by the Asserted Patents in the United States (collectively, the “DI Products”). The DI Products are and/or have been designed, developed, and/or manufactured as the result of significant investments in plant and equipment and employment of labor or capital in support of LG’s products that practice the Asserted Patents. LG’s investments in products presently under development constitute an existing domestic industry.

9.8. As a result of these continuing and planned future investments, a domestic industry exists under Section 337(a)(3)(A) due to LG’s significant investment in plant and equipment; and under Section 337(a)(3)(B) due to significant employment of labor or capital.

2. LG’s U.S. Investments

9.9. LG currently employs approximately 74,000 employees across the globe. **Exhibit 62 at 3.** Approximately 1,496 employees are based in the United States. **Exhibit 63.** Thus, LG’s U.S. employees account for approximately 2% of its global headcount.

9.10. LG’s public financial statements list its revenue by product category for fiscal years 2021-Q3 2025. LG’s “Home Entertainment (HE)” line (referred to as its “Media Entertainment Solution (MS)” line in 2024-25) covers the following products: “TVs, audio and others.” **Exhibit 61 at 49.** The DI Products all fall within the category of TVs.

9.11. LG’s HE sales revenues for 2021-2025 are set forth in the table below (*see Exhibits 61 at 49, 64 at 54, 65 at 30, 66 at 52, 67 at 54*). The amount of LG’s HE revenue attributable to the U.S. can reasonably be approximated based on LG’s U.S. vs. world-wide employee presence. Thus, it can reasonably be estimated based on LG’s U.S. headcount that approximately 2% of LG sales are made in the U.S. **Exhibit 68**.

9.12. To the extent further allocation is needed to estimate the amount of U.S. HE sales attributable to TVs within the HE segment, publicly available reports on LG indicate nearly all of its HE sales come from TVs, with only 4.82% originating from other products. **Exhibit 69**. Accordingly, LG’s U.S. sales of TVs can be estimated by subtracting 4.82% from the total estimate of U.S. HE sales.

9.13. Using the foregoing allocation methodology, an estimate of U.S. TV Sales revenue is set forth below:

Estimated DI Product U.S. Sales Revenue

HE Prod. Line	2021	2022	2023	2024	2025 ⁴	Q1 2026 ⁵
WW HE Sales Revenue (millions of won)	17,218,600	15,726,658	14,232,849	15,229,059	18,661,545	4,665,386
WW HE Sales Revenue (USD)	12,090,823,436	11,043,188,477	9,994,242,519	10,693,776,699	13,104,136,899	3,276,034,224
Estimated US HE Sales Revenue (USD)	241,816,468	220,863,769	199,884,850	213,875,533	262,082,737	65,520,684
Estimated US TV Sales Revenue (USD)	230,160,914	210,218,135	190,250,400	203,566,732	249,450,349	62,362,587

⁴ All LG investments are extracted from LG’s publicly available financials: *See Exhibit 64* (Q1-Q4 2021), *Exhibit 66* (Q1-Q4 2022), *Exhibit 67* (Q1-Q4 2023), *Exhibit 61* (Q1-Q4 2024), *Exhibit 65* (Q1-Q3 2025). All 2025 investment data is extrapolated through Q4 2025 based on public financial data through Q3 2025—this extrapolation was used for *all* domestic industry investment estimates in all tables in this section (*i.e.*, not just this Sales Revenue table).

⁵ LG’s Q1 2026 investments are estimated based on its financial data from 2025.

9.14. To estimate the amount of U.S. TV Sales Revenue attributable to the DI Products specifically, the ratio of DI Product offerings compared to LG's total TV offerings for a given year can be calculated. In particular, based on publicly available information, LG has offered approximately 62 TV offerings per year between 2021-2025.

9.15. For example, the '863 patent covers two LG TV offerings in 2025 (UP73 and UA75). Thus, the estimated sales revenue attributable to these two DI Products for 2025 would be: $\$249,450,349 * (2/62) = \$8,046,785$. As another example, the '251 DI Products include all TV offerings for 2025 and, thus, sales attributable to the '251 patent would be equal to the above estimates of U.S. TV sales for all offerings for 2025.

9.16. Using the foregoing allocation, sales revenue for the DI Products can be estimated on a per-patent basis as follows:

U.S. Patent No.	Domestic Industry Products	DI Sales Revenue
7,965,918	2025-2026: All TV models	Q1 2026: \$62,362,587 2025: \$249,450,349
12,096,066	2025-2026: All TV models	Q1 2026: \$62,362,587 2025: \$249,450,349
10,018,863	2025-2026: UP73 and UA75 Series 2022-2024: UP73	Q1 2026: 2,011,696 2025: \$8,046,785 2024: \$3,283,334 2023: \$3,068,554 2022: \$3,390,615
RE50,251	2024-2026: All TV models	Q1 2026: \$62,362,587 2025: \$249,450,349 2024: \$203,566,732
11,714,306	2025-2026: 86QNED99TUA, 75QNED99TUA, 100QNED85AU 2024: 86QNED99TUA, 75QNED99TUA	Q1 2026: \$3,017,544 2025: \$12,070,178 2024: \$6,566,668
12,038,636	2025-2026: UM73 and UA75 Series 2021-2024: UM73	Q1 2026: \$2,011,696 2025: \$8,046,785 2024: \$3,283,334 2023: \$3,068,554 2022: \$3,390,615 2021: \$3,712,272

3. LG's Significant Investment in Plant and Equipment

Buildings Owned

9.17. LG invests significant sums, and is in the process of investing additional significant sums, in domestic plant and equipment relating to the DI Products.

9.18. LGEUS's New Jersey headquarters includes a facility 352,000 sq. ft. **Exhibit 18.** This state of the art facility includes office spaces, conference rooms and a science center. *Id.* LG's New Jersey headquarters are also an R&D center. **Exhibit 19.**

9.19. LG also has a Silicon Valley Lab, which LG began in 2013 to support its Smart TV technology. **Exhibit 27.**

Value of Land and Buildings

9.20. The value of its U.S. land and buildings that can be attributable as an investment in its TVs can be reasonably estimated using the same methodology described above:

Land	2021	2022	2023	2024	2025	Q1 2026
WW Land (millions of won)	2,875,668	2,965,526	3,009,927	3,027,659	2,933,151	733,287
WW Land (USD)	2,022,092,094	2,085,277,814	2,116,499,398	2,128,968,062	2,062,512,962	515,628,240
Estimated US Land (USD)	40,441,841	41,705,556	42,329,987	42,579,361	41,250,259	10,312,564
Estimated US Land – TVs (USD)	38,492,544	39,695,348	40,289,681	40,527,035	39,261,995	9,815,498

Buildings	2021	2022	2023	2024	2025	Q1 2026
WW Buildings (millions of won)	6,525,130	6,841,961	7,080,788	7,592,398	7,355,403	1,838,850
WW Buildings (USD)	4,588,295,237	4,811,082,242	4,979,018,940	5,338,769,278	5,172,121,196	1,293,030,299
Estimated U.S. Buildings (USD)	91,765,904	96,221,644	99,580,378	106,775,385	103,442,423	25,860,605
Estimated U.S. Buildings – TVs (USD)	87,342,787	91,583,760	94,780,603	101,628,811	98,456,498	24,614,124

9.21. These investments can be further allocated to the Asserted Patents using the same methodology described above:

U.S. Patent No.	Domestic Industry Products	DI Land Investments
7,965,918	2025-2026: All TV models	Q1 2026: \$9,815,498 2025: \$39,261,995
12,096,066	2025-2026: All TV models	Q1 2026: \$9,815,498 2025: \$39,261,995
10,018,863	2025-2026: UP73 and UA75 Series 2022-2024: UP73	Q1 2026: \$316,628 2025: \$1,266,515 2024: \$653,661 2023: \$649,833 2022: \$640,247
RE50,251	2024-2026: All TV models	Q1 2026: \$9,815,498 2025: \$39,261,995 2024: \$40,527,035
11,714,306	2025-2026: 86QNED99TUA, 75QNED99TUA, 100QNED85AU 2024: 86QNED99TUA, 75QNED99TUA	Q1 2026: \$474,943 2025: \$1,899,773 2024: \$1,307,323
12,038,636	2025-2026: UM73 and UA75 Series 2021-2024: UM73	Q1 2026: \$316,628 2025: \$1,266,515 2024: \$653,661 2023: \$649,833 2022: \$640,247 2021: \$620,847

U.S. Patent No.	Domestic Industry Products	DI Buildings Investments
7,965,918	2025-2026: All TV models	Q1 2026: \$24,614,124 2025: \$98,456,498
12,096,066	2025-2026: All TV models	Q1 2026: \$24,614,124 2025: \$98,456,498
10,018,863	2025-2026: UP73 and UA75 Series 2022-2024: UP73	Q1 2026: \$794,004 2025: \$3,176,016 2024: \$1,639,174 2023: \$1,528,719 2022: \$1,477,157
RE50,251	2024-2026: All TV models	Q1 2026: \$24,614,124 2025: \$98,456,498 2024: \$101,628,811

U.S. Patent No.	Domestic Industry Products	DI Buildings Investments
11,714,306	2025-2026: 86QNED99TUA, 75QNED99TUA, 100QNED85AU 2024: 86QNED99TUA, 75QNED99TUA	Q1 2026: \$1,191,006 2025: \$4,764,024 2024: \$3,278,348
12,038,636	2025-2026: UM73 and UA75 Series 2021-2024: UM73	Q1 2026: \$794,004 2025: \$3,176,016 2024: \$1,639,174 2023: \$1,528,719 2022: \$1,477,157 2021: \$1,408,754

Investments in Equipment

9.22. LG has also made significant U.S. investments in the equipment⁶ used to test the domestic industry products in the United States. LG's publicly available financials provide world-wide figures for the value of its equipment. However, the amount of LG's investments in equipment allocable to its TVs in the U.S. can be approximated using the same methodology described above:

Equipment	2021	2022	2023	2024	2025	Q1 2026
WW Equipment (millions of won)	370,421	429,547	429,426	501,133	485,490	121,372
WW Equipment (USD)	260,470,045	302,045,852	301,960,768	352,383,195	341,383,659	85,345,914
Estimated U.S. Equipment (USD)	5,209,400	6,040,917	6,039,215	7,047,663	6,827,672	1,706,918
Estimated U.S. Equipment – TVs (USD)	4,958,306	5,749,744	5,748,124	6,707,965	6,498,577	1,624,644

9.23. These investments can be further allocated to the Asserted Patents using the same methodology described above:

	Licensee LG Domestic Industry Investments in Plant & Equipment
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⁶ On information and belief, LG has machinery and equipment related to testing and R&D of the DI products in the United States.

U.S. Pat. No.	2021	2022	2023	2024	2025	Q1 2026	Total
918	N/A	N/A	N/A	N/A	\$144,217,070	\$36,054,266	\$180,271,336
066	N/A	N/A	N/A	N/A	\$144,217,070	\$36,054,266	\$180,271,336
863	N/A	\$2,210,141	\$2,271,263	\$2,401,027	\$4,652,162	\$1,163,039	\$12,697,632
251	N/A	N/A	N/A	\$148,863,811	\$144,217,070	\$36,054,266	\$329,135,147
306	N/A	N/A	N/A	\$4,802,056	\$6,978,244	\$1,744,560	\$13,524,860
636	\$2,109,573	\$2,210,141	\$2,271,263	\$2,401,027	\$4,652,162	\$1,163,039	\$14,807,205

9.24. These plant and equipment investments are both qualitatively and quantitatively significant.

4. LG's Significant Investment in Labor and/or Capital

Number of Employees

9.25. LG has made and continues to make significant investments in labor and capital, including investments related to costs of sales, administrative expenses, sales and marketing, research and development, prototyping, assembly, warehousing, quality control and distribution.

9.26. LG currently employs approximately 74,000 global employees. **Exhibit 62.** Approximately 1,496 employees are based in the United States. **Exhibit 63.** Among these, at least 297 work in sales, 315 work in operations, 207 work in engineering, 117 work in information technology and 98 work on business development. *Id.* (“What they do” tab). Thus, LG’s U.S. employees account for approximately 2% of its global employees.

9.27. Significant numbers of LG employees work in the United States relating to the DI Products.

9.28. LG's investments in TVs in the U.S. can be approximated using the same methodology described above, *i.e.*, allocating based on LG's U.S. headcount and percentage of HE sales attributable to TVs in the U.S.:

Labor & Capital⁷

Labor & Capital	2021	2022	2023	2024	2025	Q1 2026
WW L&C (millions of won)	72,013,660	80,079,675	80,679,405	84,650,487	83,691,157	20,922,789
WW L&C (USD)	50,298,732,977	55,932,529,880	56,351,417,895	59,125,063,800	58,454,925,518	14,613,731,379
Estimated US L&C (USD)	1,005,974,659	1,118,650,597	1,127,028,357	1,182,501,276	1,169,098,510	292,274,627
Estimated US TV L&C (USD)	957,486,680	1,064,731,638	1,072,705,590	1,125,504,714	1,112,747,961	278,186,990

9.29. These investments can be further allocated to the asserted patents as discussed above:

	Licensee LG Domestic Industry Investments in Labor & Capital						
U.S. Pat. No.	2021	2022	2023	2024	2025	Q1 2026	Total
918	N/A	N/A	N/A	N/A	\$1,112,747,961	\$278,186,990	\$1,390,934,951
066	N/A	N/A	N/A	N/A	\$1,112,747,961	\$278,186,990	\$1,390,934,951
863	N/A	\$17,173,090	\$17,301,703	\$18,153,301	\$35,895,095	\$8,973,773	\$97,496,962
251	N/A	N/A	N/A	\$1,125,504,714	\$1,112,747,961	\$278,186,990	\$2,516,439,665
306	N/A	N/A	N/A	\$36,306,603	\$53,842,643	\$13,460,660	\$103,609,906
636	\$15,443,333	\$17,173,090	\$17,301,703	\$18,153,301	\$35,895,095	\$8,973,773	\$112,940,295

9.30. These labor and capital investments are both qualitatively and quantitatively significant.

⁷ Includes all LG Electronics line-items from “General Operating Expenses (Selling and Marketing Expenses, Administrative Expenses, Research and Development Expenses, and Service Costs)” as well as “Cost of Sales.”

B. The Technical Prong of the Domestic Industry Requirement Is Satisfied

9.31. In accordance with Section 337(a)(2) and (a)(3), a domestic industry exists in the United States in connection with the Asserted Patents.

9.32. Claim charts and explanatory information for products and processes that practice at least one valid asserted claim of the Asserted Patents accompany this Complaint. The exemplary DI Asserted Claims in the attached charts are listed in the table below.⁸

U.S. Patent No.	Exemplary Domestic Industry Asserted Claims
7,965,918	14
12,096,066	1
10,018,863	1
RE50,251	1
11,714,306	16
12,038,636	1

9.33. InnoTV reserves its right to update its list of domestic industry products, including in light of additional discovery.

9.34. **Exhibit 28** includes a claim chart that shows how the '918 Domestic Industry Products practice at least one claim of the '918 Patent.

9.35. **Exhibit 31** includes a claim chart that shows how the '066 Domestic Industry Products practice at least one claim of the '066 Patent.

9.36. **Exhibit 33** includes a claim chart that shows how the '863 Domestic Industry Products practice at least one claim of the '863 Patent.

9.37. **Exhibit 39** includes a claim chart that shows how the '251 Domestic Industry Products practice at least one claim of the '251 Patent.

⁸ InnoTV reserves its right to rely on additional claims of the Asserted Patents to support the technical prong of its domestic industry.

9.38. **Exhibit 53** includes a claim chart that shows how the '306 Domestic Industry Products practice at least one claim of the '306 Patent.

9.39. **Exhibit 54** includes a claim chart that shows how the '636 Domestic Industry Products practice at least one claim of the '636 Patent.

X. RELATED LITIGATIONS

10.1. The '918, '066, '863, '251, '306 and '636 Patents are the subject of a civil action in the United States District Court for the Eastern District of Texas, filed on March 2, 2026, naming the Hisense Respondents as defendants. *See* Case No. 2:26-cv-172.

10.2. Also, the '918, '066, '251, and '636 Patents are the subject of a civil action in the United States District Court for the Western District of Texas, filed on March 2, 2026, naming the Roku Respondents as defendants. *See* Case No. 1:26-cv-490.

10.3. As of the filing of this Complaint, the Asserted Patents are not the subject of any other Commission investigation, federal district action, agency action, or foreign litigation or administrative proceedings.

XI. RELIEF REQUESTED

11.1. WHEREFORE, by reason of the foregoing, InnoTV respectfully requests that the U.S. International Trade Commission:

11.2. Institute an immediate investigation pursuant to Section 337 of the Tariff Act of 1930, as amended, 19 U.S.C. § 1337(a)(1)(B)(i) and (b)(1) with respect to violations of Section 337 based upon the importation, sale for importation, and sale after importation into the United States by the Proposed Respondents of certain smart televisions, LED televisions, streaming devices, and hardware and software components thereof, that infringe one or more of the asserted claims U.S. Patent Nos. 7,965,918, 12,096,066, 10,018,863, RE50,251, 11,714,306, and 12,038,636.

11.3. Find a violation of Section 337 based on said unlawful acts;

11.4. Issue a permanent limited exclusion order under 19 U.S.C. § 1337(d)(1) barring from entry into the United States infringing certain smart televisions, LED televisions, streaming devices, and hardware and software components thereof manufactured by or on behalf of, or imported by or on behalf of, each of the Proposed Respondents or their affiliates;

11.5. Issue permanent cease and desist orders, under 19 U.S.C. § 1337(f), directing each respondent to cease and desist from the sale for importation, importation, sale after importation, distribution, offering for sale, promoting, marketing, advertising, testing, demonstrating, warehousing inventory for distribution, solicitation of sales, programming, repairing, maintaining, using, transferring, and other commercial activity relating to infringing certain smart televisions, LED televisions, streaming devices, and hardware and software components thereof;

11.6. Impose a bond upon the proposed respondents who continue to import infringing articles, including certain smart televisions, LED televisions, streaming devices, and hardware and software components thereof, during the 60-day Presidential review period pursuant to 19 U.S.C. § 1337(j); and

11.7. Grant such other and further relief as the Commission deems just and proper based on the facts determined by the investigation and the authority of the Commission.

Dated: September 30, 2026,

Respectfully submitted,

/s/ Kevin C. Wheeler

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CERTIFICATE OF SERVICE

It is hereby certified that copies of the foregoing **AMENDED COMPLAINT OF INNOTV LABS, LLC, UNDER SECTION 337 OF THE TARIFF ACT OF 1930, AS AMENDED** were served on September 30, 2026 as follows:

The Honorable Lisa R. Barton Secretary to the Commission U.S. International Trade Commission 500 E Street, SW, Room 112 Washington, DC 20436	By EDIS
Clark S. Cheney Chief Administrative Law Judge U.S. International Trade Commission 500 E Street, S.W., Room 317 Washington, D.C. 20436	By Email: Cheney1496@usitc.gov
Hari Santhanam Perkins Coie LLP 110 North Wacker Drive, Suite 3400 Chicago, IL 60606 <i>Counsel for Respondents Hisense Co., Ltd., Hisense International Co., Ltd., Hisense Visual Technology Co., Ltd., Hisense USA Corporation, Hisense Electronics Manufacturing Company of America Corporation, Hisense Monterrey Home Appliance Manufacturing, S. de R.L. de C.V., Roku, Inc., Purple Tag Media Technology (Shanghai), Ltd., Purple Tag Media Technology (Shanghai) Ltd. – Shenzhen Branch, Purple Tag Mexico, S.A. de C.V.</i>	By Email: RokuHisenseITC@perkinscoie.com

/s/ E. Alexander Cruz

E. Alexander Cruz

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