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9	UNITED STATES DISTRICT COURT CENTRAL DISTRICT OF CALIFORNIA		
10			
11	ENTROPIC COMMUNICATIONS, LLC,	Civil Action No. 2:22-cv-07775-JWH- JEM	
12			
13	Plaintiff,	PLAINTIFF'S STATEMENT OF PROPOSED TERMS AND CLAIM	
14	V.	ELEMENTS FOR	
15 16	DIRECTV, LLC and	CONSTRUCTION	
17	AT&T SERVICES, INC.,	Case Transferred from E.D. Texas (2:22-cv-75-JRG)	
18	Defendants.		
19		JURY TRIAL DEMANDED	
20			
21	ENTROPIC COMMUNICATIONS, LLC,	Civil Action No. 2:22-cv-07959-JWH- JEM	
22	Plaintiff,	Case Transferred from E.D. Texas	
23	V.	(2:22-cv-76-JRG)	
24	DISH NETWORK CORPORATION,	JURY TRIAL DEMANDED	
25	DISH NETWORK CORPORATION, DISH NETWORK L.L.C., and DISH NETWORK SERVICE L.L.C.,		
26	Defendants.		
27			
28		1 -	
		ISTRUCTION STATEMENT DISH 1009	

Pursuant to Patent Rule 4-1 of the Local Patent Rules for the Eastern District
 of Texas, Plaintiff Entropic Communications, LLC ("Plaintiff" or "Entropic")
 identifies the following claim terms, phrases or clauses which it contends may require
 construction by the Court in these cases against Defendants DISH Network
 Corporation, DISH Network L.L.C., and Dish Network Service L.L.C., Defendant
 DIRECTV, LLC, and Defendant AT&T Services, Inc. (collectively, "Defendants").

Plaintiff's proposed terms are based on information that is currently available
to Plaintiff. Plaintiff reserves the right to modify this disclosure should additional
information become available through discovery. Further, Plaintiff reserves the right
to supplement, amend, and/or modify this disclosure for any other reason including,
consistent with P.R. 4-1(b), to facilitate the preparation of the Joint Claim
Construction and Prehearing Statement, and in light of arguments made or positions
taken by Defendants as this case proceeds.

- At this time, Plaintiff states that none of the terms of the asserted patents
 require construction. Plaintiff reserves the right to propose additional claim terms for
 construction.

1		D 1 1 2022	
1	Dated:	December 1, 2022	K&L GATES LLP
2			By: <u>/s/ James A. Shimota</u> James Shimota (admitted pro hac vice)
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23			ATTORNEYS FOR PLAINTIFF
24			ENTROPIC COMMUNICATIONS, LLC
25			
26			
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28			2
		PLAINTIFF'S CLA	IM CONSTRUCTION STATEMENT

I CERTIFICATE OF SERVICE 2 The undersigned hereby certifies that a true and correct copy of the foregoing 4 PLAINTIFF'S STATEMENT OF PROPOSED TERMS AND CLAIM 5 ELEMENTS FOR CONSTRUCTION has been served on December 1, 2022, via 6 electronic mail to counsel of record for Defendants. 8 /s/ James A. Shimota 9 James A. Shimota 10 James A. Shimota 11 James A. Shimota 12 James A. Shimota 13 James A. Shimota 14 James A. Shimota 15 James A. Shimota 16 James A. Shimota 17 James A. Shimota 18 James A. Shimota 19 James A. Shimota 10 James A. Shimota 11 James A. Shimota 12 James A. Shimota 13 James A. Shimota 14 James A. Shimota 15 James A. Shimota 16 James A. Shimota 17 James A. Shimota 18 James A. James A. James A. James 19 Jam					
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