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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

ENTROPIC COMMUNICATIONS,
LLC,

Plaintiff,

v.

DIRECTV, LLC and
AT&T SERVICES, INC.,

Defendants.

Civil Action No. 2:22-cv-07775-JWH-
JEM

**PLAINTIFF'S STATEMENT OF
PROPOSED TERMS AND CLAIM
ELEMENTS FOR
CONSTRUCTION**

Case Transferred from E.D. Texas
(2:22-cv-75-JRG)

JURY TRIAL DEMANDED

ENTROPIC COMMUNICATIONS,
LLC,

Plaintiff,

v.

DISH NETWORK CORPORATION,
DISH NETWORK L.L.C., and
DISH NETWORK SERVICE L.L.C.,

Defendants.

Civil Action No. 2:22-cv-07959-JWH-
JEM

Case Transferred from E.D. Texas
(2:22-cv-76-JRG)

JURY TRIAL DEMANDED

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

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

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

1 Dated: December 1, 2022

K&L GATES LLP

2 By: /s/ James A. Shimota

3 James Shimota (admitted *pro hac vice*)

4 Jason Engel (admitted *pro hac vice*)

5 George Summerfield (*pro hac vice*
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing
**PLAINTIFF’S STATEMENT OF PROPOSED TERMS AND CLAIM
ELEMENTS FOR CONSTRUCTION** has been served on December 1, 2022, via
electronic mail to counsel of record for Defendants.

/s/ James A. Shimota
James A. Shimota