

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

GODO KAISHA IP BRIDGE 1,

Plaintiff,

v.

TCL COMMUNICATION TECHNOLOGY  
HOLDINGS LIMITED, a Chinese  
Corporation, TCT MOBILE LIMITED, a Hong  
Kong Corporation, TCT MOBILE (US), INC.,  
a Delaware Corporation, and TCT MOBILE,  
INC., a Delaware Corporation,

Defendants.

C.A. No. 15-634-JFB-SRF

**SPECIAL INTERROGATORIES**

**INSTRUCTIONS:**

Please follow the directions provided throughout this Verdict Form. Your answer to each question must be unanimous.

Please refer to the Jury Instructions for guidance on the law applicable to each question.

Throughout this form, "IP Bridge" means Plaintiff Godo Kaisha IP Bridge 1 and "TCL" means Defendants TCL Communication Technology Holdings Limited, TCT Mobile Limited, TCT Mobile (US), Inc., and TCT Mobile, Inc.

The "Asserted Patents" mean, collectively, U.S. Patent Nos. 8,351,538 (the "538 patent") and 8,385,239 (the "239 patent").

**1. INFRINGEMENT**

(Please indicate your answer with an "X," you must answer "yes" or "no" for every claim).

A. Did IP Bridge prove, by a preponderance of the evidence, that TCL infringed or infringes any of the following claims of the '538 Patent, as instructed in Instruction Nos. 18 to 20?

Claim 15     Yes  
                   No

Claim 16     Yes  
                   No

B. Did IP Bridge prove, by a preponderance of the evidence, that TCL infringed or infringes any of the following claims of the '239 Patent, as instructed in Instruction Nos. 18 to 20?

Claim 9      Yes  
                   No

Claim 12     Yes  
                   No

- If you answered "yes" to any of the above infringement questions, proceed to answer Question No. 2 with respect to that patent.
- If you answered "no" to all of the above infringement questions, you should skip Question No. 2 and proceed to answer Question No. 3.

## 2. WILLFUL INFRINGEMENT

A. Do you find, by a preponderance of the evidence, as instructed in Instruction No. 47, that TCL's infringement of the '538 patent was:

Willful

Not willful

B. Do you find, by a preponderance of the evidence, as instructed in Instruction No. 47, that TCL's infringement of the '239 patent was:

Willful

Not willful

- Proceed to answer question No. 3.

**3. INVALIDITY**

A. Did TCL prove, by clear and convincing evidence, that any of the following claims of the Asserted Patents are invalid because they were anticipated by the prior art, as instructed in Instruction Nos. 22 to 26 or would have been obvious as instructed in Instruction Nos. 28a to 32a?

**'239 Patent**

Claim 9 Yes \_\_\_\_\_

No X

Claim 12 Yes \_\_\_\_\_

No X

B. Did TCL prove by clear and convincing evidence that any of the following claims of the Asserted Patents are invalid because they would have been obvious, as instructed in Instruction Nos. 28a to 32a?

**'538 Patent**

Claim 15 Yes \_\_\_\_\_

No X

Claim 16 Yes \_\_\_\_\_

No X

If you answered "no" to Question No. 3A and "yes" to Question 1A, proceed to answer Question No. 4 for the '239 Patent.

If you answered "no" to Question No. 3B and "yes" to Question No. 1B, proceed to answer Question No. 4 for the '538 Patent.

If you answered "yes" to both Question No. 3A and Question No. 3B, your deliberations are at an end. Have your foreperson sign and date this form and notify chambers that you have reached a verdict.

**4. PATENT DAMAGES**

What has IP Bridge proven, by a preponderance of the evidence, to be a fair, reasonable, and non-discriminatory ("FRAND") royalty for use of the invention covered by all of the infringed and valid Asserted Patent(s)?

FRAND royalty: \$ 9<sup>50</sup>~~50~~,000

You have now reached the end of the verdict form and should review it to ensure it accurately reflects your unanimous determinations. Your Foreperson should sign and date this form and notify my chambers that you have reached a verdict. The Foreperson should retain possession of the verdict form and bring it when the jury is brought back into the courtroom.

\_\_\_\_\_  
Foreperson

Dated this 8<sup>th</sup> day of November, 2018