

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

SENTIENT SENSORS, LLC,	)	
	)	
Plaintiff,	)	C.A. No. 22-cv-173-MN
	)	
v.	)	JURY TRIAL DEMANDED
	)	
XILINX INCORPORATED	)	
	)	
Defendant.	)	
	)	

PLAINTIFF’S RULE 26(A)(1) INITIAL DISCLOSURES

Pursuant to the Discovery Order and Rule 26(a)(1)(A), Fed. R. Civ. P., Plaintiff Sentient Sensors, LLC (“SS”) makes the following initial disclosures based on information reasonably available to them at this time:

- (a) The correct names of the parties to the lawsuit are Sentient Sensors, LLC, Plaintiff, and Xilinx Incorporated, Defendant.
- (b) Additional potential parties that are known to Plaintiff at this time are:
 - 1. None.
- (c) Plaintiff alleges that Defendant has been and are now infringing claims of Plaintiff’s U.S. Patent No. 6,938,177 by making, using, importing, providing, supplying, distributing, selling, and offering to sell infringing products and systems, and is thus liable to Plaintiff under 35 U.S.C. § 271. Defendant infringes both directly under 35 U.S.C. § 271(a), and indirectly under 35 U.S.C. §§ 271(b) and (c) by virtue of inducing others to infringe and contributing to the infringement of others. Defendant infringes the claims literally but would also infringe under the doctrine of equivalents. As a result of Defendant’s infringement, Plaintiff is entitled to damages in an amount no less than a reasonable royalty pursuant to 35 U.S.C. § 284. The full measure of

damages sustained as a result of Defendant's infringement will be proven at trial. Plaintiff also reserves the right to amend its pleadings to seek a willfulness finding and treble damages under 35 U.S.C. § 284 as well as its attorneys' fees and costs in prosecuting this action under 35 U.S.C. § 285.

(d) Persons having knowledge of relevant facts include:¹

Kenneth J. Blemel
Management Sciences, Inc.
6022 Constitution Avenue NE
Albuquerque, NM 87110
Tel: (505) 255-8611
(Inventor of patent-in-suit with
knowledge of conception and
reduction to practice of claimed
invention)

Marlene Kay Blemel
Management Sciences, Inc.
6022 Constitution Avenue NE
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Tel: (505) 255-8611
(Person with knowledge of
conception and reduction to
practice of the claimed
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James Lyke
USAF Research Laboratory
3300 Kirtland Road SE
Kirtland AFB, NM 87117
Tel: (505) 846-5812
(Person with knowledge of
potential prior art and of
research and development,
conception and reduction to
practice of claimed invention)

David R. Alexander
1721 Pedregoso Place,
Albuquerque, NM 87123

¹ Each person(s) listed below should only be contacted through counsel for Plaintiff.

Tel: (505) 269-3895
(Person with knowledge of
conception and reduction to
practice of claimed invention)

Sheppard Mullin
(Persons with knowledge of the
prosecution of the patent-in-
suit)

Durwin F. De La Rue
Management Sciences, Inc.
6022 Constitution Avenue NE
Albuquerque, NM 87110
Tel: (505) 255-8611
(Person with knowledge of
MSI's document retention
policies and efforts to comply
with Defendant's document
requests)

Plaintiff further responds by identifying Defendant Xilinx, either collectively with all corporate parents, corporate predecessors, corporate successors, and past or present subsidiaries, affiliates, divisions, departments, officers, directors, principals, agents, and employees or as individual entities.

Plaintiff further responds by identifying any of Defendant's current and former employees, agents, or representatives (including outside consultants) having knowledge, including any knowledge of research and development and source code, concerning any of Defendant's product(s) that are or may be accused of infringing the Patent-in-Suit, including the products identified as infringing in Plaintiff's complaint.

In addition to the persons identified above, Plaintiff incorporates herein by reference:
(i) any person identified by Defendant in its Initial Disclosures, including as amended or supplemented; (ii) the persons identified in depositions; (iii) any person identified in any answer to any interrogatory or other discovery response; (iv) any person identified as a custodian of

documents produced by any party in response to discovery requests or by a third party in response to a subpoena in this action or in any related action; and (v) experts identified by Defendant.

(e) Plaintiff is not aware of indemnity agreements between Defendant and any other entity.

(f) All documents, electronically stored information, and tangible things relating to the patent, patent invention, and reduction to practice are located at:

Management Sciences, Inc.
6022 Constitution Avenue NE
Albuquerque, NM 87110

(g) All documents relating to the file history are located at:

Kaliko & Associates, LLC
633 Wyckoff Ave.
Wyckoff, NJ 07481

December 22, 2022

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/s/ Michael J. Farnan

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that all counsel of record is being served with a copy of this document by electronic mail, on this the 22nd day of **December 2022**.

Dated: December 22, 2020

/s/ Michael J. Farnan
Michael J. Farnan (#5165)