

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION

SONRAI MEMORY LTD.,

Plaintiff,

v.

MICRON TECHNOLOGY, INC.,

Defendant.

Case No. 6:22-cv-00855-ADA-DTG

**DEFENDANT MICRON TECHNOLOGY, INC.'S
PRELIMINARY INVALIDITY CONTENTIONS**

I. INTRODUCTION

Pursuant to the Scheduling Order, Dkt. No. 29, Defendant Micron Technology, Inc. (“Micron”) provides these Preliminary Invalidity Contentions to Plaintiff Sonrai Memory Ltd. (“Plaintiff”) for U.S. Patent Nos. 6,920,527 (“the ’527 Patent”) and 6,724,241 (“the ’241 Patent”), collectively, the “Patents-in-Suit” or “Asserted Patents.” Micron also serves contemporaneously herewith the accompanying production of documents as required by the Scheduling Order and the Local Rules.

These Preliminary Invalidity Contentions are made as to only the claims of the Patents-in-Suit that Plaintiff has identified in Plaintiff’s Preliminary Infringement Contentions served on April 5, 2023 (the “Infringement Contentions”):

Patent	Asserted Claims
’527 Patent	1, 2, 3, 4, 5, 6, 9, 11, 12, 15, 16, and 17
’241 Patent	1, 2, 7, 8, 11, and 24

Micron reserves the right to supplement these invalidity contentions to the extent Plaintiff is allowed to change its Asserted Claims, in response to new information learned during the case, or as a result of the claim construction process.

These preliminary invalidity contentions are being made in the early stages of the case. The parties have not yet started general discovery, and no depositions have been noticed or taken. No third party discovery has been taken. Accordingly, Micron reserves the right to supplement and amend these preliminary contentions to the extent additional information becomes available during discovery. For example, Micron may serve third party discovery on companies that it believes are informed and have relevant prior art, and reserves the right to supplement or amend these disclosures as may be appropriate in the future. Micron may also take third party discovery from the individuals named as inventors on the Asserted Patents. Micron reserves the right to

supplement and/or amend its invalidity contentions based on information discovered from Plaintiff, from these third party sources, or other sources. Micron may also serve additional third-party discovery in the future including, but not limited to, based on discovery received from Plaintiff and/or the above-referenced third parties, and reserves the right to supplement and/or amend its contentions accordingly.

Micron hereby incorporates by reference the invalidity contentions served on Plaintiff by other defendants for which Plaintiff has asserted each of the Asserted Patents, including but not limited to the defendants in *Sonrai Memory Limited v. Kingston Technology Company, Inc.*, No. 6:21-cv-1284 (W.D. Tex.); *Sonrai Memory Limited v. Kingston Technology Company, Inc.*, No. 6:22-cv-192 (W.D. Tex.); *Sonrai Memory Limited v. Western Digital Technologies, Inc.*, No. 6:21-cv-1168 (W.D. Tex.); *Sonrai Memory Limited v. Kioxia Corporation*, No. 6:21-cv-400 (W.D. Tex.); *Sonrai Memory Limited v. Dell Technologies, Inc.*, No. 6:21-cv-361 (W.D. Tex.); *Sonrai Memory Limited v. Dell Technologies, Inc.*, No. 1:22-cv-487 (W.D. Tex.); *Sonrai Memory Limited v. Dell Technologies, Inc.*, No. 6:22-cv-188 (W.D. Tex.); *Sonrai Memory Limited v. LG Electronics Inc.*, 6:21-cv-168 (W.D. Tex.); *Sonrai Memory Limited v. LG Electronics Inc.*, No. 6:22-cv-187 (W.D. Tex.); *Sonrai Memory Limited v. Apple Inc.*, No. 6:21-cv-401 (W.D. Tex.); *Sonrai Memory Limited v. Apple Inc.*, No. 6:22-cv-787 (W.D. Tex.); *Sonrai Memory Limited v. Samsung Electronics Co., Ltd.*, No. 6:21-cv-169 (W.D. Tex.); *Sonrai Memory Limited v. Samsung Electronics Co., Ltd.*, No. 6:22-cv-189 (W.D. Tex.); *Sonrai Memory Limited v. Amazon.Com, Inc.*, No. 6:21-cv-991 (W.D. Tex.); *Sonrai Memory Limited v. Amazon.Com, Inc.*, No. 6:22-cv-225 (W.D. Tex.); *Sonrai Memory Limited v. Google LLC*, No. 6:21-cv-167 (W.D. Tex.); *Sonrai Memory Limited v. Google LLC*, No. 6:22-cv-336 (W.D. Tex.); including all charts, cover

pleadings, exhibits, prior art, invalidity arguments including, but not limited to, arguments based on 35 U.S.C. §§ 101, 102, 103, 112, and otherwise.

Micron hereby incorporates by reference the grounds presented in any *inter partes* review of each of the Asserted Patents, including but not limited to the following petitions: IPR2023-00904, IPR2022-00437, IPR2022-00765, IPR2022-00762, IPR2022-00255, IPR2023-00909, and IPR2021-01561.

II. RESERVATIONS

a. General Reservation of Rights

The information provided shall not be deemed an admission regarding the scope of any claims or the proper construction of those claims or any claim terms. Micron does not waive the right to contest any claim constructions or to take the positions during claim construction proceedings that have yet to occur that may be inconsistent with the preliminary invalidity contentions herein.

In certain instances, Micron has applied the claims to the prior art in view of Plaintiff's allegations, admissions, or positions for purposes of these preliminary invalidity contentions only. This disclosure of preliminary invalidity contentions is not intended to be, and is not, an admission that any Asserted Claim is infringed by any of Micron's products, that any particular feature or aspect of any of the accused products practices any limitations of the Asserted Claims, or that any of the constructions implicit in Plaintiff's Infringement Contentions are reasonable, supportable, or proper. Rather, in some instances, Micron's application of the claims to the prior art is intended to apply Plaintiff's apparent interpretation of the claims.

b. Plaintiff's Infringement Contentions

Plaintiff's Infringement Contentions to Micron are deficient in numerous respects. Micron first notified Plaintiff of these deficiencies at least on April 26, 2023 and May 15, 2023, but

Plaintiff has not supplemented its contentions to date. Micron reserves the right to modify, amend, or supplement its contentions to the extent Plaintiff modifies, amends, or supplements its disclosures and/or produces documents in discovery.

Additionally, Plaintiff has presented no substantive contentions of any alleged infringement under the doctrine of equivalents in its Infringement Contentions. It has provided boilerplate reservations of rights, and made general references to the doctrine of equivalents, but has provided no substantive allegation in its Infringement Contentions. As a result, Plaintiff has waived any doctrine of equivalents theory. If Plaintiff is permitted to provide any information relating to infringement under the doctrine of equivalents, Micron may amend and supplement these preliminary invalidity contentions as appropriate.

c. The Intrinsic Record

Micron further reserves the right to rely on applicable industry standards and prior art cited in the file histories of the Asserted Patents and any related U.S. and foreign patent applications as invalidating references or to show the state of the art. Micron further reserves the right to rely on the patent applicant's admissions concerning the scope of the prior art relevant to the Asserted Patents found in, *inter alia*: the patent prosecution history for the Asserted Patents and any related patents and/or parent applications or reexaminations (or *inter partes* review or post-grant review proceedings); any deposition testimony of a named inventor of the Asserted Patents; any deposition testimony or other admissions by Plaintiff; and the papers filed and any evidence submitted by Plaintiff in connection with this litigation.

d. Rebuttal Evidence

Prior art not included in these preliminary invalidity contentions, whether known or not known to Micron, may become relevant. In particular, Micron is currently unaware of the extent, if any, to which Plaintiff will contend that limitations of the Asserted Claims of the Asserted

Patents are not disclosed in the prior art identified herein or otherwise contend the Asserted Patents are not invalid. To the extent that such an issue arises, Micron reserves the right to identify other references that would render obvious the allegedly missing limitation(s) or the disclosed device or method, or otherwise rebut Plaintiff's argument(s).

e. Contextual Evidence

Micron's claim charts cite particular teachings and disclosures of the prior art as applied to the limitations of each of the Asserted Claims. However, a person having ordinary skill in the art ("POSITA") generally may view an item of prior art in the context of his or her experience and training, other publications, literature, products, and understandings. Moreover, common sense may be employed as part of the obviousness analysis. As such, Micron may rely on the cited portions of the prior art references and on other publications, expert testimony, and common sense as aids in understanding and interpreting the cited portions, as providing context thereto, and as additional evidence that the prior art discloses a claim limitation or the claimed subject matter as a whole. Micron further reserves the right to rely on uncited portions of the prior art references, other publications, and testimony, including expert testimony, to establish bases for combinations of certain cited references that render the Asserted Claims obvious. The references discussed in the corresponding claim charts may disclose the elements of the Asserted Claims explicitly and/or inherently, and/or they may be relied upon to show the state of the art in the relevant time frame. Any suggested obviousness combinations are provided in the alternative to anticipation contentions and are not to be construed to suggest that any reference included in the combinations is not by itself anticipatory.

III. PRIORITY DATE OF ASSERTED PATENTS

a. The '527 Patent (Asserted Claims 1, 2, 3, 4, 5, 6, 9, 11, 12, 15, 16, and 17)

The '527 Patent was filed on February 11, 2003.

b. The '241 Patent (Asserted Claims 1, 2, 7, 8, 11, and 24)

The '241 Patent claims priority to Italian Patent Application No. MI2002A2268, filed on October 25, 2002. Micron reserves the right to challenge any assertion that the '241 Patent is entitled to claim the benefit of that Italian application's filing date to the extent that the application does not support the full scope of the Asserted Claims of the '241 Patent, for example, depending on scope of the Asserted Claims as properly construed. To the extent the provisional application does not support the full scope of the Asserted Claims of the '241 Patent, the priority date of the '241 Patent should be the filing date of the application from which the '241 Patent issued—January 27, 2003.

IV. INVALIDITY UNDER 35 U.S.C. §§ 102 AND 103

Micron identifies the following prior art now known to Micron that anticipates or renders obvious the Asserted Claims under at least 35 U.S.C. §§ 102(a), (b), (e), and/or (g), and/or § 103, either expressly or inherently as understood by a POSITA.

Exhibits 1 through 17 (for the '527 Patent) and 18 through 24 (for the '241 Patent) provide detailed claim charts showing where each claim element may be found in the particular references being charted. Each of these Exhibits is without prejudice to Micron's indefiniteness positions under 35 U.S.C. § 112, and assume that such positions have been rejected by the Court. Nothing in the Exhibits should be taken as a concession that the claims are not indefinite.

For those references for which detailed claim charts are provided in the Exhibits, the Exhibit Number is listed next to the prior art reference in the tables below. Prior art references which are not associated with an Exhibit Number are additional prior art references that are pertinent to the invalidity of the Patent-in-Suit, either alone or in combination with other references. At this time, Micron has not provided claim charts for each of these additional references, either because they are cited in conjunction with references for which charts have

already been provided, are cited in these preliminary contentions, and/or because these references have similar disclosures to the prior art references for which invalidity charts have been provided and/or may be used to show the state of the art.

Micron also incorporates as if fully set forth in these preliminary contentions the complete prosecution histories for the Patents-in-Suit and related patents, including the prior art and supporting documents cited in those prosecution histories. Micron may cite or rely upon the prosecution histories, the examiner's findings, and the prior art cited therein to support or provide context for these preliminary invalidity contentions.

Micron relies upon not only the prior art disclosed in these preliminary invalidity contentions, but also any commercial embodiments and accompanying literature (or other evidence and/or witness testimony) of the various assignees that correspond to the respective disclosures found within the prior art disclosed in these contentions. The assignees' various and respective commercial embodiments and/or corresponding literature (or other evidence and/or witness testimony) anticipate and/or render obvious the claims of the Patents-in-Suit for at least the reasons disclosed in these preliminary invalidity contentions and claim charts, as well as for other independent reasons found within the commercial embodiments and corresponding literature. Micron also reserves the right to rely on related patents, published applications, foreign patents or publications, and other patent documents as necessary to establish prior art status or clarify the disclosures cited. Micron further reserves the right to rely on the earliest publication or priority dates to which each of the prior art references are entitled, including dates on which a claim of priority may be based for patent references that are any of a divisional, continuation, or continuation-in-part of an earlier filed patent application.

Micron reserves the right to revise its claim charts to rely on any of these references to prove the invalidity of the claims of the Patents-in-Suit in a manner consistent with the Federal Rules of Civil Procedure, the Court's Local Rules, and this Court's Orders.

a. The '527 Patent

i) Prior Art References

The following patents and publications are prior art to the '527 patent Asserted Claim under at least 35 U.S.C. §§ 102(a), (b), (e), and/or (g), and/or § 103. The prior art listed below anticipates either expressly or inherently as understood by a person having ordinary in the art and/or renders obvious the Asserted Claims of the '527 patent. The specific assertions with respect to each claim are set forth in the accompanying claim charts, Exhibits 1-17.

Exhibit No.	Description	Date Filed	Date Published/Issued
1, 13	U.S. Patent No. 5,950,013 ("Yoshimura")	Aug. 8, 1997 (foreign application priority date: Mar. 17, 1997)	Sep. 7, 1999
2	Japanese Laid-Open Patent Pub. No. H06-028114A ("Kodera")	Jul 8, 1992	Feb. 4, 1994
3	U.S. Patent Application Publication No. 2003/0028733 ("Tsunoda")	Jun. 13, 2002 (foreign application priority date: Jun. 13, 2001)	Feb. 6, 2003
3, 4	Japanese Published Patent Application No. 2001-005723 ("Tomio")	Jun. 21, 1999	Jan. 12, 2001
5, 14	U.S. Patent No. 6,693,840 ("Shimada")	Oct. 15, 2002 (foreign application priority date: Oct. 17, 2001)	May 22, 2003 / Feb. 17, 2004
6	WO1999024907A1 ("Thomas")	Nov. 12, 1997	May 20, 1999

Exhibit No.	Description	Date Filed	Date Published/Issued
7	US6473355 (“Caulkins”)	Dec. 1, 2000	Jun. 6, 2002 / Oct. 29, 2002
8, 11	US5781719 (“Hirofumi”)	Jul. 20, 1995	Jul. 14, 1998
10	JP2002007003A (“Oya”)	Jun. 27, 2000	Jan. 11, 2002
9	US6744692 (“Shiota”)	Jan. 14, 2003 (foreign application priority date: Feb. 7, 2002)	Aug. 7, 2003 / Jun. 1, 2004
1, 5	U.S. Patent No. 6,671,808 (“Abbott”)	Mar. 30, 1999 (provisional filed Jan. 15, 1999)	Dec. 30, 2003
1, 5	U.S. Patent No. 6,947,288 (“Simmons”)	Jan. 30, 2003 (provisional filed Dec. 17, 1999)	Dec. 4, 2003 / Sep. 20, 2005
1, 2	U.S. Patent No. 6,148,354 (“Ban”)	Apr. 5, 1999	Nov. 14, 2000
1, 2	Japanese Unexamined Patent Application P2001-127453A (“Tamura”)	Oct. 28, 1999	May 11, 2001
1	U.S. Patent No. 6,567,273 (“Liu”)	Apr. 25, 2002 (foreign application priority date: Feb. 6, 2002)	May 20, 2003
2	Japanese Laid-Open Patent Pub. No. H04-188347A (“Takamori”)	Nov. 22, 1990	July 6, 1992
3, 4, 11	Japanese Published Patent Application No. 2000-112836 to Shigeo Suzuki (“Shigeo”)	Oct. 1, 1998	Apr. 21, 2000
4	U.S. Patent No. 7,069,370 to Sukegawa et al. (“Sukegawa”)	Jan. 31, 2003	Aug. 5, 2004 / Jun. 27, 2006
6	JP2001523024 A (“Thomas 024”)	Oct. 28, 1998	Nov. 20, 2001

Micron’s investigation into prior art patent and publication references remains ongoing, and Micron reserves the right to identify and rely on additional patent or publication references

that are identified through further investigation or discovery. Micron reserves the right to supplement as further prior art is identified through investigation or discovery.

Micron reserves the right to rely on prior art systems that correspond to or practice the disclosures in the above identified publications. Micron's investigation of such products and systems is ongoing and Micron reserves the right to seek discovery and supplement its invalidity contentions based on information learned about those products and systems. Micron expects to further investigate said systems once discovery opens, including through potential third party subpoenas, and reserves the right to supplement these contentions and accompanying claim charts after further investigation.

Micron further identifies the following prior art systems that were known, used, or sold prior to the priority date of the '527 Patent. The specific assertions with respect to each claim are set forth in the accompanying claim charts, Exhibits 11-17. Micron's investigation of such products and systems is ongoing and it reserves the right to seek discovery and supplement its invalidity contentions based on information learned about those products and systems. Micron expects to further investigate the following systems once discovery opens, including through potential third party subpoenas, and reserves the right to supplement these contentions and accompanying claim charts after further investigation.

- Sega Dreamcast VMU
- E-Disk® all-electronic IDE/ATA solid state hard disk drive ("E-Disk SSDs")
- Prior Flash Memory Devices, for example, M-Systems DiskOnKey/USB flash drives ("M-Systems USB flash drive"), USB flash drives with STMicroelectronics ST7265 controller ("STM USB flash drive"), M-Systems DiskOnChip flash disk ("DiskOnChip"), SanDisk FlashDisk, SanDisk CF Card, SanDisk SD Card, SanDisk MMC Card or E-Disk SSDs in view of U.S. Patent No. 5,950,013 ("Yoshimura")
- Prior Flash Memory Devices, for example, M-Systems DiskOnKey/USB flash drives ("M-Systems USB flash drive"), USB flash drives with STMicroelectronics ST7265 controller ("STM USB flash drive"), M-Systems DiskOnChip flash disk

(“DiskOnChip”), SanDisk FlashDisk, SanDisk CF Card, SanDisk SD Card, SanDisk MMC Card or E-Disk SSDs in view of U.S. Patent No. 6,693,840 (“Shimada”)

- Siemens C541U Microcontroller or a prior memory device incorporating Siemens C541U Microcontroller
- Prior Flash Memory Devices, for example, M-Systems DiskOnKey/USB flash drives (“M-Systems USB flash drive”), USB flash drives with STMicroelectronics ST7265 controller (“STM USB flash drive”), M-Systems DiskOnChip flash disk (“DiskOnChip”), SanDisk FlashDisk, SanDisk CF Card, SanDisk SD Card, SanDisk MMC Card or E-Disk SSDs in view of Japanese Patent Application Pub. No. H6-28114 (“Kodera”)
- Prior memory device incorporating STMicroelectronics ST7265 controller

ii) Obviousness

Below and provided in Exhibits 1 through 17 are descriptions of exemplary combinations of references that would render obvious the Asserted Claims of the ’527 Patent and motivations to combine such references. In addition to the combinations described therein, the combination of (1) any of the references listed above with the knowledge of a POSITA or (2) any of the exemplary combinations listed below and in Exhibits 1 through 17 with the knowledge of a POSITA would render obvious the ’527 Patent Asserted Claim.

iii) Motivations to Combine

The United States Supreme Court clarified the standard for what types of inventions are patentable in *KSR Int’l Co. v Teleflex Inc.*, emphasizing that inventions arising from ordinary innovation, ordinary skill, or common sense should not be patentable. 127 S. Ct. 1727, 1732, 1738, 1742-1743, 1746 (2007). In that regard, a patent claim may be obvious if the combination of elements was obvious to try or there existed at the time of inventions a known problem for which there was an obvious solution encompassed by the patent’s claims. In addition, when a work is available in one field of endeavor, design incentives and other market forces can prompt variations

of it, whether in the same field or a different one. If a person of ordinary skill can implement a predictable variation, Section 103 likely bars its patentability.

“[T]he combination of familiar elements according to known methods is likely to be obvious when it does no more than yield predictable results.” *Id.* at 1731. Because the Patents-in-Suit simply arrange old elements with each performing the same function it had been known to perform and yields no more than what one would expect from such an arrangement, the combination is obvious. *Id.* at 1742. The Asserted Claims of the ’527 Patent are therefore invalid under 35 U.S.C. § 103 because they do nothing more than combine known techniques and apparatuses according to their known and ordinary uses to yield predictable results.

The Supreme Court further held that, “[w]hen a work is available in one field of endeavor, design incentives and other market forces can prompt variations of it, either in the same field or a different one. If a person of ordinary skill can implement a predictable variation, § 103 likely bars its patentability. For the same reason, if a technique has been used to improve one device, and a person of ordinary skill in the art would recognize that it would improve similar devices in the same way, using the technique is obvious unless its actual application is beyond his or her skill. . . .” *Id.* at 1740. Accordingly, a person of ordinary skill in the art at the time of the alleged invention would have been motivated to combine or adapt known or familiar methods in the art, especially where market forces prompt such variations.

A person of ordinary skill in the art at the time of the alleged invention of each of the above patents would have been motivated to combine or adapt known or familiar methods in the art, especially where market forces prompt such variations.

Moreover, each of the above-identified references describes methods that were known to offer improvements and benefits to the art, and, accordingly, one of skill in the art would have

been motivated to combine or modify the references as identified in each of the combinations above.

Further still, since there were a finite number of predictable solutions, a person of ordinary skill in the art had a good reason to pursue the known options. The above-identified prior art references merely use those familiar elements for their primary or well-known purpose in a manner well within the ordinary level of skill in the art. Accordingly, common sense and the knowledge of the prior art render the claims invalid under Section 102 or Section 103.

A person of ordinary skill would also have been motivated to combine the above prior art based on his/her knowledge, the nature of the problem to be solved, and the teachings of the prior art. The identified prior art addresses the same or similar technical issues and suggests the same or similar solutions to those issues. Moreover, some of the prior art refer to or discuss other prior art, illustrating the close technical relationship among the prior art. As one example, the references listed above are directed to the same or similar technology.

Should any prior art cited above be deemed not to disclose, explicitly or inherently, any limitation of a claim, Micron reserves the right to argue that any such difference between that prior art and the corresponding claim would have been obvious to one of ordinary skill in the art. To the extent that such an argument is deemed a “combination” analysis for purposes of obviousness, Micron discloses its present intention to rely on the separate combination of the knowledge of a person of ordinary skill in the art with each item of prior art identified above. The knowledge of a person of ordinary skill in the art is demonstrated by the full list of references above, the prior art produced, the state of the art, and common sense.

A skilled artisan would have been motivated to combine the different publications and patents that were authored by employees of the company or assigned to the same assignee and related to the same subject matter.

A skilled artisan would have been motivated to combine different references that were authored, developed, or invented by the same individual(s) related to the same subject matter. The common inventor/author/architect references themselves demonstrate that they relate to continued work in a common field of effort and continued related developments in that field. A skilled artisan would, therefore, combine the references related to each individual.

Based on the teachings of the references and/or the knowledge of one of ordinary skill, one of skill in the art would have been motivated to combine different references from the same company.

The Asserted Claims of the '527 Patent are rendered obvious by each of the anticipatory references, either alone or in combination with other references. All concepts disclosed in the claims in the '527 Patent represent well-known features. Such concepts and features were all well-known in the prior art and would have been available to a POSITA, rendering each asserted claim of the '527 Patent obvious, as described in Exhibits 1 through 17.

While Micron reserves the right to rely on any combination of the references reflected in the accompanying charts or incorporated herein by reference, Micron provides the following exemplary and non-exhaustive references and/or combinations evidencing invalidity of the Asserted Claims of the '527 Patent. The combinations of prior art listed below render obvious the Asserted Claims of the '527 Patent under the proper construction of the claims and/or under Plaintiff's apparent interpretation of the claims as set forth by Plaintiff in its Complaint and Infringement Contentions. Each combination renders the identified claims obvious through the

express and/or inherent disclosure in the combination of references themselves, as well as in view of the knowledge of a person of ordinary skill in the art.

Obviousness Combinations	'527 Patent Asserted Claims
U.S. Patent No. 5,950,013 ("Yoshimura") in view of U.S. Patent No. 6,567,273 ("Liu")	All Asserted Claims
U.S. Patent No. 5,950,013 ("Yoshimura") in view of U.S. Patent No. 6,671,808 ("Abbott")	All Asserted Claims
U.S. Patent No. 5,950,013 ("Yoshimura") in view of U.S. Patent No. 6,947,288 ("Simmons")	All Asserted Claims
U.S. Patent No. 5,950,013 ("Yoshimura") in view of U.S. Patent No. 6,148,354 ("Ban")	All Asserted Claims
U.S. Patent No. 5,950,013 ("Yoshimura") in view of Japanese Unexamined Patent Application P2001-127453A ("Tamura")	All Asserted Claims
Japanese Laid-Open Patent Pub. No. H06-028114A ("Kodera") in view of U.S. Patent No. 6,148,354 ("Ban")	All Asserted Claims
Japanese Laid-Open Patent Pub. No. H06-028114A ("Kodera") in view of Japanese Unexamined Patent Application P2001-127453A ("Tamura")	All Asserted Claims
Japanese Laid-Open Patent Pub. No. H06-028114A ("Kodera") in view of Japanese Laid-Open Patent Pub. No. H04-188347A ("Takamori")	All Asserted Claims
U.S. Patent Application Publication No. 2003/0028733 ("Tsunoda") in view of Japanese Published Patent Application No. 2001-005723 ("Tomio")	All Asserted Claims
U.S. Patent Application Publication No. 2003/0028733 ("Tsunoda") in view of Japanese Published Patent Application No. 2000-112836 to Shigeo Suzuki ("Shigeo")	All Asserted Claims
Japanese Published Patent Application No. 2001-005723 ("Tomio") in view of Japanese Published Patent Application No. 2000-112836 to Shigeo Suzuki ("Shigeo")	All Asserted Claims

Obviousness Combinations	'527 Patent Asserted Claims
Japanese Published Patent Application No. 2001-005723 ("Tomio") in view of U.S. Patent No. 7,069,370 to Sukegawa et al. ("Sukegawa")	All Asserted Claims
U.S. Patent No. 6,693,840 ("Shimada") in view of U.S. Patent No. 6,671,808 ("Abbott")	All Asserted Claims
U.S. Patent No. 6,693,840 ("Shimada") in view of U.S. Patent No. 6,947,288 ("Simmons")	All Asserted Claims

In addition to the specific combinations of prior art and the specific combinations of groups of prior art disclosed above, Micron reserves the right to rely on any other combination of any prior art references disclosed herein. Micron further reserves the right to rely upon combinations disclosed within the prosecution history of the references cited herein. These obviousness combinations reflect Micron's present understanding of the potential scope of the claims that Plaintiff appears to be advocating and should not be seen as Micron's acquiescence to Plaintiff's interpretation of the patent claims.

Micron also reserves the right to amend or supplement these contentions regarding anticipation or obviousness of the Asserted Claims of the '527 Patent, in view of further information from Plaintiff, information discovered during discovery, or a claim construction ruling by the Court. Plaintiff has not identified what elements or combinations it alleges were not known to one of ordinary skill in the art at the time. Therefore, for any claim limitation that Plaintiff alleges is not disclosed in a particular prior art reference, Micron reserves the right to assert that any such limitation is either inherent in the disclosed reference or obvious to one of ordinary skill in the art at the time in light of the same, or that the limitation is disclosed in another of the references disclosed above and in combination would have rendered the Asserted Claims of the '527 Patent obvious.

b. The '241 Patent

i. Prior Art References

The following patents and publications are prior art to the '241 Patent Asserted Claim under at least 35 U.S.C. §§ 102(a), (b), (e), and/or (g), and/or § 103. The prior art listed below anticipates either expressly or inherently as understood by a person having ordinary in the art and/or renders obvious the Asserted Claims of the '241 Patent. The specific anticipation assertions with respect to each claim are set forth in the accompanying claim charts, Exhibits 18 through 24.

Exhibit No.	Description	Date Filed	Date Published/Issued
	'241 Patent, FIG. 1, labeled by Applicant as "Prior Art," reads on asserted claims 4, 5, 14, 15, and 22		
18	US6424570 (Le)	Jan. 16, 2002	Feb. 4, 2003
19	US6373325 (Kuriyama)	Mar. 13, 2000 (foreign priority: Mar. 18, 1999)	Apr. 16, 2002
20	JP S61-024094 (Ujiie)	Jul. 1, 1984	Feb. 1, 1986
21	US5872733 (Buti)	Oct. 2, 1996	Feb. 16, 1999
22	US4769784 (Doluca)	Aug. 19, 1986	Sep. 6, 1988
23	US6486728 (Kleveland)	Mar. 16, 2001	Sep. 19, 2002 / Nov. 26, 2002
24	US6404274 (Hosono)	Apr. 9, 1999	June 11, 2002
18-24	US6661683 (Botker)	Mar. 18, 2002	Sep. 18, 2003 / Dec. 9, 2003
18-24	US6091613 (Yang)	Apr. 20, 1999	July 18, 2000 / Jul. 18, 2000
18-24	US4506350 (Asano)	Mar. 1, 1982	Mar. 19, 1985

Exhibit No.	Description	Date Filed	Date Published/Issued
18-24	US6469482 (Jahanshir)	Jun. 30, 2000	Oct. 22, 2022
18-24	US5563779 (Cave)	Dec. 5, 1994	Oct. 9, 1996
18-24	US6661715 (Ishikawa)	Jun. 4, 2002	Oct. 17, 2002 / Dec. 9, 2003
18, 19, 20	US6515903 (Le 903)	Jan. 16, 2002	Feb. 4, 2003

Micron's investigation into prior art patent and publication references remains ongoing, and Micron reserves the right to identify and rely on additional patent or publication references that are identified through further investigation or discovery. Micron reserves the right to supplement as further prior art is identified through investigation or discovery.

Micron reserves the right to rely on prior art systems that correspond to or practice the disclosures in the above identified publications. Micron's investigation of such products and systems is ongoing and Micron reserves the right to seek discovery and supplement its invalidity contentions based on information learned about those products and systems. Micron expects to further investigate said systems once discovery opens, including through potential third party subpoenas, and reserves the right to supplement these contentions and accompanying claim charts after further investigation.

iv) Obviousness

Below and provided in Exhibits 18 through 24 are descriptions of exemplary combinations of references that would render obvious the Asserted Claims of the '241 Patent and motivations to combine such references. In addition to the combinations described therein, the combination of (1) any of the references listed above with the knowledge of a POSITA or (2) any of the exemplary

combinations listed below and in Exhibits 18 through 24 with the knowledge of a POSITA would render obvious the Asserted Claims of the '241 Patent.

v) Motivations to Combine

The United States Supreme Court clarified the standard for what types of inventions are patentable in *KSR Int'l Co. v Teleflex Inc.*, emphasizing that inventions arising from ordinary innovation, ordinary skill, or common sense should not be patentable. 550 U.S. 398, 402, 413, 419-21, 427 (2007). In that regard, a patent claim may be obvious if the combination of elements was obvious to try or there existed at the time of inventions a known problem for which there was an obvious solution encompassed by the patent's claims. In addition, when a work is available in one field of endeavor, design incentives and other market forces can prompt variations of it, whether in the same field or a different one. If a person of ordinary skill can implement a predictable variation, Section 103 likely bars its patentability.

“[T]he combination of familiar elements according to known methods is likely to be obvious when it does no more than yield predictable results.” *Id.* at 416. Because the Patents-in-Suit simply arrange old elements with each performing the same function it had been known to perform and yields no more than what one would expect from such an arrangement, the combination is obvious. *Id.* at 420. The Asserted Claims of the '241 Patent are therefore invalid under 35 U.S.C. § 103 because they do nothing more than combine known techniques and apparatuses according to their known and ordinary uses to yield predictable results.

The Supreme Court further held that, “[w]hen a work is available in one field of endeavor, design incentives and other market forces can prompt variations of it, either in the same field or a different one. If a person of ordinary skill can implement a predictable variation, § 103 likely bars its patentability. For the same reason, if a technique has been used to improve one device, and a person of ordinary skill in the art would recognize that it would improve similar devices in the

same way, using the technique is obvious unless its actual application is beyond his or her skill. . .” *Id.* at 417. Accordingly, a person of ordinary skill in the art at the time of the alleged invention would have been motivated to combine or adapt known or familiar methods in the art, especially where market forces prompt such variations.

A person of ordinary skill in the art at the time of the alleged invention of each of the above patents would have been motivated to combine or adapt known or familiar methods in the art, especially where market forces prompt such variations.

Moreover, each of the above-identified references describes methods that were known to offer improvements and benefits to the art, and, accordingly, one of skill in the art would have been motivated to combine or modify the references as identified in each of the combinations above.

Further still, since there were a finite number of predictable solutions, a person of ordinary skill in the art had a good reason to pursue the known options. The above-identified prior art references merely use those familiar elements for their primary or well-known purpose in a manner well within the ordinary level of skill in the art. Accordingly, common sense and the knowledge of the prior art render the claims invalid under Section 102 or Section 103.

A person of ordinary skill would also have been motivated to combine the above prior art based on his/her knowledge, the nature of the problem to be solved, and the teachings of the prior art. The identified prior art addresses the same or similar technical issues and suggests the same or similar solutions to those issues. Moreover, some of the prior art refer to or discuss other prior art, illustrating the close technical relationship among the prior art. As one example, the references listed above are directed to the same or similar technology.

Should any prior art cited above be deemed not to disclose, explicitly or inherently, any limitation of a claim, Micron reserves the right to argue that any such difference between that prior art and the corresponding claim would have been obvious to one of ordinary skill in the art. To the extent that such an argument is deemed a “combination” analysis for purposes of obviousness, Micron discloses its present intention to rely on the separate combination of the knowledge of a person of ordinary skill in the art with each item of prior art identified above. The knowledge of a person of ordinary skill in the art is demonstrated by the full list of references above, the prior art produced, the state of the art, and common sense.

A skilled artisan would have been motivated to combine the different publications and patents that were authored by employees of the company or assigned to the same assignee and related to the same subject matter.

A skilled artisan would have been motivated to combine different references that were authored, developed, or invented by the same individual(s) related to the same subject matter. The common inventor/author/architect references themselves demonstrate that they relate to continued work in a common field of effort and continued related developments in that field. A skilled artisan would, therefore, combine the references related to each individual.

Based on the teachings of the references and/or the knowledge of one of ordinary skill, one of skill in the art would have been motivated to combine different references from the same company.

The Asserted Claims of the '241 Patent are rendered obvious by each of the anticipatory references, either alone or in combination with other references. All concepts disclosed in the claims in the '241 Patent represent well-known features. Such concepts and features were all well-

known in the prior art and would have been available to a POSITA, rendering each of the Asserted Claims of the '241 Patent obvious, as described in Exhibits 18 through 24.

While Micron reserves the right to rely on any combination of the references reflected in the above charts or incorporated herein by reference, Micron provides the following exemplary and non-exhaustive references and/or combinations evidencing invalidity of the Asserted Claims of the '241 Patent. The combinations of prior art listed below render obvious the Asserted Claims of the '241 Patent under the proper construction of the claims and/or under Plaintiff's apparent interpretation of the claims as set forth by Plaintiff in their Complaint and Infringement Contentions. Each combination renders the identified claims obvious through the express and/or inherent disclosure in the combination of references themselves, as well as in view of the knowledge of a person of ordinary skill in the art.

Obviousness Combinations	Claims
U.S. Patent No. 6,424,570 ("Le") in view of U.S. Patent No. 6,091,613 ("Yang")	All Asserted Claims
U.S. Patent No. 6,424,570 ("Le") in view of U.S. Patent No. 6,404,274 ("Hosono")	All Asserted Claims
U.S. Patent No. 6,424,570 ("Le") in view of U.S. Patent No. 4,506,350 ("Asano")	All Asserted Claims
U.S. Patent No. 6,424,570 ("Le") in view of U.S. Patent No. 6,373,325 ("Kuriyama")	All Asserted Claims
U.S. Patent No. 6,424,570 ("Le") in view of Japan Patent Application Publication S61-24094 ("Ujiie")	All Asserted Claims
U.S. Patent No. 6,373,325 ("Kuriyama") in view of U.S. Patent No. 6,091,613 ("Yang")	All Asserted Claims
U.S. Patent No. 6,373,325 ("Kuriyama") in view of U.S. Patent No. 6,404,274 ("Hosono")	All Asserted Claims
U.S. Patent No. 6,373,325 ("Kuriyama") in view of U.S. Patent No. 4,506,350 ("Asano")	All Asserted Claims

Obviousness Combinations	Claims
U.S. Patent No. 6,373,325 (“Kuriyama”) in view of Japan Patent Application Publication S61-24094 (“Ujiie”)	All Asserted Claims
Japan Patent Application Publication S61-24094 (“Ujiie”) in view of U.S. Patent No. 6,091,613 (“Yang”)	All Asserted Claims
Japan Patent Application Publication S61-24094 (“Ujiie”) in view of U.S. Patent No. 6,404,274 (“Hosono”)	All Asserted Claims
Japan Patent Application Publication S61-24094 (“Ujiie”) in view of U.S. Patent No. 4,506,350 (“Asano”)	All Asserted Claims
U.S. Patent No. 5,872,733 (“Buti”) in view of U.S. Patent No. 4,769,784 (“Doluca”)	All Asserted Claims
U.S. Patent No. 5,872,733 (“Buti”) in view of U.S. Patent No. 6,091,613 (“Yang”)	All Asserted Claims
U.S. Patent No. 5,872,733 (“Buti”) in view of U.S. Patent No. 6,404,274 (“Hosono”)	All Asserted Claims
U.S. Patent No. 5,872,733 (“Buti”) in view of U.S. Patent No. 4,506,350 (“Asano”)	All Asserted Claims
U.S. Patent No. 4,769,784 (“Doluca”) in view of U.S. Patent No. 6,091,613 (“Yang”)	All Asserted Claims
U.S. Patent No. 4,769,784 (“Doluca”) in view of U.S. Patent No. 6,404,274 (“Hosono”)	All Asserted Claims
U.S. Patent No. 4,769,784 (“Doluca”) in view of U.S. Patent No. 4,506,350 (“Asano”)	All Asserted Claims
U.S. Patent No. 6,486,728 (“Kleveland”) in view of U.S. Patent No. 6,661,683 (“Botker”)	All Asserted Claims
U.S. Patent No. 6,486,728 (“Kleveland”) in view of U.S. Patent No. 6,404,274 (“Hosono”)	All Asserted Claims
U.S. Patent No. 6,486,728 (“Kleveland”) in view of U.S. Patent No. 6,091,613 (“Yang”)	All Asserted Claims
U.S. Patent No. 6,486,728 (“Kleveland”) in view of Japan Patent Application Publication S61-24094 (“Ujiie”)	All Asserted Claims
U.S. Patent No. 6,404,274 (“Hosono”)	All Asserted Claims

In addition to the specific combinations of prior art and the specific combinations of groups of prior art disclosed above, Micron reserves the right to rely on any other combination of any prior art references disclosed herein. Micron further reserves the right to rely upon combinations disclosed within the prosecution history of the references cited herein. These obviousness combinations reflect Micron's present understanding of the potential scope of the claims that Plaintiff appears to be advocating and should not be seen as Micron's acquiescence to Plaintiff's interpretation of the patent claims.

Micron also reserves the right to amend or supplement these contentions regarding anticipation or obviousness of the Asserted Claims of the '241 Patent, in view of further information from Plaintiff, information discovered during discovery, or a claim construction ruling by the Court. Plaintiff has not identified what elements or combinations it alleges were not known to one of ordinary skill in the art at the time. Therefore, for any claim limitation that Plaintiff alleges is not disclosed in a particular prior art reference, Micron reserves the right to assert that any such limitation is either inherent in the disclosed reference or obvious to one of ordinary skill in the art at the time in light of the same, or that the limitation is disclosed in another of the references disclosed above and in combination would have rendered the Asserted Claims of the '241 Patent obvious.

V. INVALIDITY UNDER 35 U.S.C. § 112

The grounds identified below both individually and collectively render certain of the Asserted Claims invalid under the statutory requirements of § 112. By identifying certain claim language below, Micron does not imply that such language is entitled to any patentable weight when comparing the claim as a whole to the prior art. Micron's identifications are made based on Micron's present understanding of the Asserted Claims and Plaintiff's apparent interpretation of these claims as reflected in its Infringement Contentions, and Micron reserves the right to amend

these identifications, including in response to claim constructions and claim interpretations that would render claim limitations not enabled, lacking in written description, or indefinite. Defendant also reserves the right to assert that a claim is indefinite, not enabled, or fails to meet the written description requirement based on any claim construction position Plaintiff may take in this case or based on any claim construction the Court may adopt in this case. To the extent a claim element is contained within an element identified below or encompasses an element identified below, that claim element also renders the claim invalid under 35 U.S.C. § 112.

a. Lack of Enablement and Written Description under 35 U.S.C. § 112 ¶ 1

Section 112 of Title 35 of the U.S. Code includes an enablement requirement: “The specification shall contain a written description . . . of the manner and process of making and using [the invention] in such full, clear, concise and exact terms as to enable any person skilled in the art to which it pertains, or with which it is most nearly connected, to make and use the same.” 35 U.S.C. § 112, ¶ 1. To satisfy the enablement requirement, the disclosure “must teach those skilled in the art how to make and use the full scope of the claimed invention without ‘undue experimentation.’” *Genentech, Inc. v. Novo Nordisk A/S*, 108 F.3d 1361, 1366 (Fed. Cir. 1997); *MagSil Corp. v. Hitachi Glob. Storage Techs., Inc.*, 687 F.3d 1377, 1381 (Fed. Cir. 2012); *Sitrick v. Dreamworks, LLC*, 516 F.3d 993, 999 (Fed. Cir. 2008). If a specification teaches away from a substantial portion of the claim or does not enable the full scope of the claim, there is no enablement. *AK Steel Corp. v. Sollac*, 344 F.3d 1234, 1239-1241, 1244-1245 (Fed. Cir. 2003); *see also MagSil Corp.*, 687 F.3d at 1383-84 (Fed. Cir. 2012).

35 U.S.C. § 112 further includes a written description requirement: “The specification shall contain a written description of the invention” 35 U.S.C. § 112, ¶ 1. “To satisfy the written description requirement, a patent applicant must convey with reasonable clarity to those skilled in the art that, as of the filing date sought, he or she was in possession of the invention.” *ICU Med.*

Inc. v. Alaris Medical Sys., Inc., 558 F.3d 1368, 1377 (Fed. Cir. 2009) (internal quotation marks and citations omitted); *see also Synthes USA, LLC v. Spinal Kinetics, Inc.*, 734 F.3d 1332, 1340 (Fed. Cir. 2013). “The test [for written description support] requires an objective inquiry into the four corners of the specification from the perspective of a person of ordinary skill in the art. Based on that inquiry, the specification must describe an invention understandable to that skilled artisan and show that the inventor actually invented the invention claimed.” *Ariad Pharms., Inc. v. Eli Lilly & Co.*, 598 F.3d 1336, 1351 (Fed. Cir. 2010) (*en banc*).

The specification must describe the claimed invention in sufficient detail so that a POSITA can recognize what is claimed. “The appearance of mere indistinct words in a specification or a claim, even an original claim, does not necessarily satisfy that requirement.” *Univ. of Rochester v. G.D. Searle & Co.*, 358 F.3d 916, 923 (Fed. Cir. 2004) (internal quotation marks and citations omitted).

Based on Micron’s present understanding of the Asserted Claims and Plaintiff’s apparent interpretation of these claims as reflected in its Infringement Contentions, the following limitations of the Asserted Claims fail to satisfy the requirements of § 112, ¶ 1 because the specification and original patent application fail to provide an enabling disclosure of and written description support for at least the following limitations:

Asserted Patent, Claim No.	Unsupported Claim or Individual Element
’527 Patent, Claim 1	“housing” / “comprised in the housing” / “positioned on the housing”
’527 Patent, Claim 8	“restraint device”
’527 Patent, Claim 19	“restraining”
’527 Patent, Claim 11	“further comprising an outer impact resistant shell”

Asserted Patent, Claim No.	Unsupported Claim or Individual Element
'527 Patent, Claim 6	“wherein said memory controller chip transfers said non-volatile memory with data written to said volatile memory from said computer system while said portable memory apparatus is coupled to said computer system.”
'527 Patent, Claim 12	“wherein said portable memory apparatus does not have any moving parts.”
'241 Patent, Claims 13, 14, 22	“coupled to” / “coupling to”
'241 Patent, Claims 11, 12, 21	“enable terminal [of a comparator]”
'241 Patent, Claim 12	“a set load coupled to the pump output and being controlled by the logic circuit for adding an additional load to the output pump when . . .”
'241 Patent, Claim 21	“the second terminal being coupled to the output terminal of the first comparator”

b. Indefiniteness Under 35 U.S.C. § 112 ¶ 2

Section 112, ¶ 2 includes a definiteness requirement: “[T]he specification shall conclude with one or more claims particularly pointing out and distinctly claiming the subject matter which the applicant regards as his invention.” 35 U.S.C. § 112, ¶ 2. “[A] patent is invalid for indefiniteness if its claims, read in light of the patent’s specification and prosecution history, fail to inform, with reasonable certainty, those skilled in the art about the scope of the invention.” *Nautilus, Inc. v. Biosig Instruments, Inc.*, 572 U.S. 898, 901 (2014).

The definiteness requirement requires that the claim must set forth what the applicant regards as the invention, and do so with sufficient particularity and definiteness. *See Allen Eng’g Corp. v. Bartell Indus.*, 299 F.3d 1336, 1348 (Fed. Cir. 2002). Where it would be apparent to one of skill in the art, based on the patent specification, that the “invention” set forth in a claim is not what the patent applicant regarded as the invention, the claim is invalid. *Id.*

Based on Defendant's present understanding of the Asserted Claims and Plaintiff's apparent interpretation of these claims as reflected in its Infringement Contentions, the following limitations of the Asserted Claims fail to satisfy the requirements of § 112, ¶ 2 because the precise scope of at least the terms listed below cannot be determined with reasonable certainty by a POSITA when reading the claims in light of the specification and prosecution history:

Asserted Patent, Claim No.	Indefinite Claim Limitation(s)
'527 Patent, Claim 1	"memory controller"
'527 Patent, Claim 6	"wherein said memory controller chip transfers said non-volatile memory with data written to said volatile memory from said computer system"
'527 Patent, Claim 13	"before said volatile memory is transferred to said non-volatile memory"
'527 Patent, Claim 20	"before said volatile memory is transferred to said non-volatile memory"
'527 Patent, Claims 1, 6	"said memory control chip"
'527 Patent, Claims 10, 13, 20	"said connection"
'527 Patent, Claim 1	"wherein, when said connector couples said portable memory apparatus to said computer system, said memory controller chip copies data from said nonvolatile memory to said volatile memory, and said computer system accesses said data in said volatile memory through said connector"
'527 Patent, Claim 12	"wherein said portable memory apparatus does not have any moving parts."
'527 Patent, All Asserted Claims	"portable"
'241 Patent, Claims 1-3, 6	"load selector means"
'241 Patent, All Asserted Claims	"maximum" / "minimal"

Asserted Patent, Claim No.	Indefinite Claim Limitation(s)
'241 Patent, Claims 11, 12, 21	"enable terminal [of a comparator]"
'241 Patent, Claims 7, 9	"NMOS transistor" / "NMOS load transistor" / "load NMOS load transistor"
'241 Patent, Claim 25	"whenever the maximum acceptable ripple output voltage value is greater than"
'241 Patent, Claim 3	"whenever a maximum ripple on the target output voltage (Vcfrb) greater than the reference voltage (Vref) then the maximum ripple on the target output selector means adds additional loads."
'241 Patent, Claims 24, 25	"comparing . . . whenever . . . , disabling . . ."
'241 Patent, Claim 13	"memory device" / "memory system"
'241 Patent, Claim 12	"the maximum overshoot on target output selector means"
'241 Patent, Claim 12	"the input terminal of the fourth resistor network"
'241 Patent, Claim 22	"first diode" / "second diode" / "last diode"

VI. DOCUMENT PRODUCTION ACCOMPANYING PRELIMINARY INVALIDITY CONTENTIONS

Micron is producing and making available for inspection documents required under the Court's Scheduling Order simultaneous with these contentions.

Micron reserves the right to produce and rely on additional documents relating to its Preliminary Invalidity Contentions in view of, for example, additional information revealed during discovery regarding Plaintiff's allegations, amendments to Plaintiff's Infringement Contentions, a claim construction order, or other information learned through discovery or otherwise.

Dated: June 7, 2023

FISH & RICHARDSON P.C.

By: /s/ Bryan K. Basso

Adam R. Shartzter (DC 994420)

shartzter@fr.com

Timothy W. Riffe (DC 482810)

riffe@fr.com

FISH & RICHARDSON P.C.

1000 Maine Avenue SW, Suite 1000

Washington, D.C. 20024

Tel: (202) 783-5070 | Fax: (202) 783-2331

Bryan K. Basso (CA 278973)

basso@fr.com

FISH & RICHARDSON P.C.

500 Arguello Street, Suite 400

Redwood City, CA 94063

Tel: (650) 839-5070 | Fax: (650) 839-5071

ATTORNEYS FOR DEFENDANT
MICRON TECHNOLOGY, INC.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on June 7, 2023 they caused the foregoing
DEFENDANT MICRON TECHNOLOGY, INC.'S PRELIMINARY INVALIDITY
CONTENTIONS to be served by electronic mail upon the below listed counsel of record:

Brett E. Cooper (bcooper@bc-lawgroup.com)
Seth Hasenour (shasenour@bc-lawgroup.com)
Jonathan Y. Yim (jyim@bc-lawgroup.com)
Drew B. Hollander (dhollander@bc-lawgroup.com)
BC LAW GROUP, P.C.
200 Madison Avenue, 24th Floor
New York, NY 10016
Tel: (212) 951-0100 | Fax: (212) 951-0300

Attorneys For Plaintiff

SONRAI MEMORY LIMITED

/s/ Francine Lopacinski

Francine Lopacinski