# EXHIBIT 8

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

| | |
|---|---|
| **GREENTHREAD, LLC,**<br><br>**Plaintiff,**<br><br>**v.**<br><br>**INTEL CORPORATION, DELL INC., AND DELL TECHNOLOGIES INC.,**<br><br>**Defendants.** | **Case No. 6:22-cv-00105-ADA** |

**GREENTHREAD'S AMENDED PRELIMINARY INFRINGEMENT CONTENTIONS**

Pursuant to the Court's Standing Order Governing Proceedings (OGP) 4.1—Patent Cases, Plaintiff Greenthread, LLC ("Greenthread"), concurrent with the filing of its First Amended Complaint, hereby provides its amended preliminary infringement contentions, including identification of asserted claims, the priority date for each asserted claim, accused products, and accompanying document production. Claim charts are attached as Exhibits A-1 through A-6, B-1 through B-6, C-1 through C-6, D-1, D-2, D-3, and D-6.

Greenthread's disclosures are based on publicly available materials regarding the accused infringing products of Intel Corporation ("Intel"), Dell Inc., and Dell Technologies Inc. (Dell Inc. and Dell Technologies Inc. are collectively "the Dell Defendants" or "Dell," and Intel Corporation and the Dell Defendants are collectively "Defendants"). Greenthread does not yet have access to any of Defendants' discovery materials that may be relevant to its infringement claims and thus relies on publicly available materials. In light of the absence of discovery and reliance on publicly available materials, Greenthread has procured limited physical testing to the extent practicable, of

certain products believed to be representative of, and similar to, the accused infringing products in pertinent respects. Greenthread explicitly reserves the right to supplement or alter its disclosures herein, as a matter of right, as permitted by the Court, based on the Court's claim constructions, based on additional information obtained through formal discovery or other means, and/or based on other circumstances.

## I. ASSERTED CLAIMS AND PRIORITY DATE

Based on the information presently available to it, Greenthread identifies the asserted claims of each asserted patent that Greenthread alleges is infringed by Defendants, and the priority date of those claims, as set forth in the table below. Based on the information presently available to it, Greenthread alleges that all asserted claims of each particular asserted patent are entitled to the same priority date.

| Patent | Asserted Claims | Priority Date of Asserted Claims |
|---|---|---|
| 10,510,842 ("the '842 patent") | 1, 2, 4-10, 12-18 | September 3, 2004 |
| 10,734,481 ("the '481 patent") | 1-9, 13, 15-20, 22-27, 31-36 | September 3, 2004 |
| 11,121,222 ("the '222 patent") | 1-9, 13, 15- 21, 23-28, 32-42, 44 | September 3, 2004 |
| 8,421,195 ("the '195 patent") | 1-3, 5-6 | September 3, 2004 |
| 9,190,502 ("the '502 patent") | 7-9, 11 | September 3, 2004 |
| 11,316,014 (the "'014 Patent") | 1-9, 13, 15-21, 23-28 | September 3, 2004 |

Greenthread notes that the claims identified in the table reflect the asserted claims in this case, and the absence of a claim from the list does not imply that the claim is not infringed. Greenthread explicitly reserves the right to supplement or alter its identification of asserted claims and priority dates, as a matter of right, as permitted by the Court, based on any further claim

constructions, additional information obtained through formal discovery or other means, and/or based on other circumstances.

## II. ACCUSED PRODUCTS

Based upon information presently available to it, Greenthread asserts infringement by the accused products set forth below in this section. For each accused product identified below, Greenthread's contentions apply to the accused product and any other similar past, present, or future products, as well as systems incorporating the accused products or other products with the same or substantially similar features.

### A. Intel Accused Products

As described further in Exhibits A-1 through A-6 and Exhibits B-1 through B-6 below, Intel's CPU products and Intel's flash memory products infringe one or more asserted claims of each of the asserted patents.

Intel Accused CPUs include all CPUs designed or manufactured (in whole or in part) by Intel, that have the same or similar structures, features, or functionalities as the exemplary Intel Core i7 11800H CPU shown in Exhibits A-1 through A-6. As shown in Exhibits A-1 through A-6, Intel Accused CPUs each infringe one or more claims of U.S. Patent Nos. 8,421,195 (claims 1-3, 5-6), 9,190,502 (claims 7-9), 10,510,842 (claims 1-2, 4-10, 12-18), 10,734,481 (claims 1-9, 13, 15, 17-18, 20, 22-27, 31-32, 34-35), 11,121,222 (claims 1-9, 13, 15, 17-18, 20-21, 23-28, 32-33, 35-36, 38-42, 44), 11,316,014 (claims 1-9, 13, 15, 17-18, 20-21, 23-28). Intel Accused CPUs include the 12th generation semiconductor products labeled as "Alder Lake," the 11th generation semiconductor products labeled as "Tiger Lake," and the 10th generation semiconductor products labeled as "Comet Lake." The following listing of Intel 10th, 11th, and 12th generation

semiconductor products is derived from publicly available information at Intel's website, as noted in Exhibit G to Greenthread's Complaint (Dkt. 1-7).

Greenthread reserves the right to supplement the list of Intel Accused Products as discovery proceeds.

**12th Generation "Alder Lake" Intel Products**

1. Intel Core i5-12400
2. Intel Core i5-12400F
3. Intel Core i5-12400T
4. Intel Core i5-12450H
5. Intel Core i5-12500
6. Intel Core i5-12500E
7. Intel Core i5-12500H
8. Intel Core i5-12500T
9. Intel Core i5-12500TE
10. Intel Core i5-12600
11. Intel Core i5-12600KF
12. Intel Core i5-12600H
13. Intel Core i5-12600HE
14. Intel Core i5-12600T
15. Intel Core i5-12600K
16. Intel Core i5-12600KF
17. Intel Core i7-12650H
18. Intel Core i7-12700
19. Intel Core i7-12700E
20. Intel Core i7-12700F
21. Intel Core i7-12700H
22. Intel Core i7-12700T
23. Intel Core i7-12700TE
24. Intel Core i7-12800H
25. Intel Core i7-12800HE
26. Intel Core i7-12700K
27. Intel Core i7-12700KF
28. Intel Core i9-12900
29. Intel Core i9-12900E
30. Intel Core i9-12900F
31. Intel Core i9-12900H
32. Intel Core i9-12900HK
33. Intel Core i9-12900T
34. Intel Core i9-12900TE
35. Intel Core i9-12900K
36. Intel Core i9-12900KF
37. Intel Core i9-12900KF

**11th Generation "Tiger Lake" Intel Products**

1. Intel Core i3 11100HE
2. Intel Core i3 1115G4E
3. Intel Core i3 1115GRE
4. Intel Core i3 1120G4
5. Intel Core i3 1125G4
6. Intel Core i3 1110G4
7. Intel Core i3 1115G4
8. Intel Core i5 11500HE
9. Intel Core i5 11320H
10. Intel Core i5 1155G7
11. Intel Core i5 11260H
12. Intel Core i5 11400H
13. Intel Core i5 11500H
14. Intel Core i5 11600
15. Intel Core i5 11600
16. Intel Core i5 11600T
17. Intel Core i5 11500
18. Intel Core i5 11600KF
19. Intel Core i5 11600K
20. Intel Core i5 11400T
21. Intel Core i5 11500T
22. Intel Core i5 11400F
23. Intel Core i5 11400
24. Intel Core i5 11300H
25. Intel Core i5 1140G7
26. Intel Core i5 1145G7
27. Intel Core i5 1145GZE
28. Intel Core i5 1145GRE
29. Intel Core i5 1135G7
30. Intel Core i5 1130G7

31. Intel Core i7 11850HE
32. Intel Core i7 11600H
33. Intel Core i7 11390H
34. Intel Core i7 1195G7
35. Intel Core i7 11800H
36. Intel Core i7 11850H
37. Intel Core i7 11700KF
38. Intel Core i7 11700F
39. Intel Core i7 11700
40. Intel Core i7 11700T
41. Intel Core i7 11700K
42. Intel Core i7 11370H
43. Intel Core i7 1180G7
44. Intel Core i7 11375H
45. Intel Core i7 1185GRE
46. Intel Core i7 1185G7E
47. Intel Core i7 1167G7
48. Intel Core i7 1185G7
49. Intel Core i7 1165G7
50. Intel Core i7 1160G7
51. Intel Core i9 11950H
52. Intel Core i9 11980HK
53. Intel Core i9 11900H
54. Intel Core i9 11900
55. Intel Core i9 11900F
56. Intel Core i9 11900T
57. Intel Core i9 11900KF
58. Intel Core i9 11900K

**10th Generation "Comet Lake" Intel Products**

1. Intel Core i3 10105
2. Intel Core i3 10105F
3. Intel Core i3 10105T
4. Intel Core i3 10305
5. Intel Core i3 10305T
6. Intel Core i3 10325
7. Intel Core i3 10100Y
8. Intel Core i3 10100F
9. Intel Core i3 10100
10. Intel Core i3 10100E
11. Intel Core i3 10100T
12. Intel Core i3 10100TE
13. Intel Core i3 100300
14. Intel Core i3 100300T
15. Intel Core i3 10320
16. Intel Core i3 10110U
17. Intel Core i3 10110Y
18. Intel Core i3 1000G1
19. Intel Core i3 1000G4
20. Intel Core i3 1005G1
21. Intel Core i5 10505
22. Intel Core i5 10500H
23. Intel Core i5 10200H
24. Intel Core i5 10310U
25. Intel Core i5 1038NG7
26. Intel Core i5 10400
27. Intel Core i5 10400F
28. Intel Core i5 10400T
29. Intel Core i5 10500
30. Intel Core i5 10500E
31. Intel Core i5 10500T
32. Intel Core i5 10500TE
33. Intel Core i5 10600
34. Intel Core i5 10600K
35. Intel Core i5 10600KF
36. Intel Core i5 10600T
37. Intel Core i5 10300H
38. Intel Core i5 10400H
39. Intel Core i5 10210U
40. Intel Core i5 10210Y
41. Intel Core i5 10310U
42. Intel Core i5 1030G4
43. Intel Core i5 1030G7
44. Intel Core i5 1035G1
45. Intel Core i5 1035G4
46. Intel Core i5 1035G7
47. Intel Core i7 10870H
48. Intel Core i7 10610U
49. Intel Core i7 10810U
50. Intel Core i7 1068NG7
51. Intel Core i7 10700
52. Intel Core i7 10700E
53. Intel Core i7 10700F
54. Intel Core i7 10700K
55. Intel Core i7 10700KF
56. Intel Core i7 10700T
57. Intel Core i7 10700TE
58. Intel Core i7 10750H
59. Intel Core i7 10850H

60. Intel Core i7 10875H
61. Intel Core i7 10510U
62. Intel Core i7 10710U
63. Intel Core i7 1060G7
64. Intel Core i7 1065G7
65. Intel Core i9 10850K
66. Intel Core i9 10885H
67. Intel Core i9 10900
68. Intel Core i9 10900E
69. Intel Core i9 10900F
70. Intel Core i9 10900KF
71. Intel Core i9 10900T
72. Intel Core i9 10900TE
73. Intel Core i9 10900HK

"Intel Accused Flash Memory Products" include flash memory products designed or manufactured (in whole or in part) by Intel that have the same or similar structures, features, or functionalities as the exemplary Micron 16 nm node NAND flash memory analyzed in Exhibits B-1 through B-6 regardless of how they are branded. That exemplary product was manufactured by Intel and bears Intel die marks.

Figure 1.1.2: Die markings (optical), 16 nm MLC NAND flash memory of IMFT

On information and belief, Intel designs and/or fabricates flash memory products using similar designs according to a limited number of processes, many or all of which utilize substantially similar process steps, including process steps for creating regions with graded dopant

concentrations. Accordingly, statements in Exhibits B-1 through B-6 referring to Micron's flash memory products are equally applicable to Intel Accused Flash Memory Products.

As shown in Exhibits B-1 through B-6, Intel Accused Flash Memory Products each infringe one or more claims of U.S. Patent Nos. 8,421,195 (claims 1-3, 5-6), 9,190,502 (claims 7-8, 11), 10,510,842 (claims 1-2, 4-5, 7-10, 12-13, 15-18), 10,734,481 (claims 1-4, 6-9, 13, 15-16, 20, 22-24, 26-27, 31-33), 11,121,222 (claims 1-4, 6-9, 13, 15-17, 20-21, 23-25, 27-28, 32-34, 38-42, 44), 11,316,014 (claims 1-4, 6-9, 13, 15-17, 20-21, 23-25, 27-28).

Intel Accused CPU Products and Intel Accused Flash Memory Products are collectively the "Intel Accused Products."

### B. Dell Accused Products

Dell's products infringe one or more asserted claims of the asserted patents ("Dell Accused Products"). Dell Accused Products include Dell Products (as defined in the First Amended Complaint) that incorporate or comprise Intel Accused Products ("Dell-Intel Accused Products"), Dell-Micron Accused Products (defined in the First Amended Complaint), Dell-WD Accused Products (defined in the First Amended Complaint), and Dell-Sony Accused Products (defined in the First Amended Complaint).

#### 1. Dell-Intel Accused Products

Dell Products comprising or containing Intel Accused Products are Dell-Intel Accused Products and infringe the same claims of the Greenthread Patents as the Intel Accused Products for the same reasons. The following listing of Dell-Intel Accused Products is derived from publicly available information at Dell's website, as noted in Exhibit G to Greenthread's Complaint (Dkt. 1-7). Greenthread reserves the right to supplement the list of Dell Accused Products, e.g., as discovery proceeds.

1. New XPS Desktop
2. Alienware Aurora R13 Gaming Desktop
3. New XPS Desktop
4. Alienware x17 Gaming Laptop
5. Alienware x15 Gaming Laptop
6. XPS 17 Touch Laptop
7. Alienware m15 R6 Gaming Laptop
8. XPS 15 Laptop
9. XPS 15 Touch Laptop
10. XPS 13 Touch Laptop
11. G15 Special Edition Gaming Laptop
12. XPS 13 Laptop
13. XPS 13 2-in-1 Laptop
14. Inspiron 15 2-in-1 Laptop
15. XPS 13 Touch Laptop
16. New Inspiron 16 Plus Laptop
17. G15 Gaming Laptop
18. XPS 17 Laptop
19. XPS 13 Laptop
20. Inspiron 17 2-in-1 Laptop
21. Inspiron 14 2-in-1 Laptop
22. Inspiron 13 Laptop
23. Inspiron 13 2-in-1 Plus Laptop
24. Inspiron 15 Laptop
25. Inspiron 14 Laptop
26. Inspiron 15 3000 Laptop
27. New Inspiron 15 1300 Laptop
28. Alienware m15 R4 Gaming Laptop
29. Inspiron Desktop
30. XPS Desktop
31. Other Dell products incorporating Intel Accused Products.

This identification of Dell-Intel Accused Products is based upon Greenthread's investigation to date, which has included limited physical testing to the extent practicable and has been undertaken at significant expense to Greenthread.

**2. Dell-Micron Accused Products**

Dell-Micron Accused Products include all Dell Products containing or comprising flash memory designed or manufactured (in whole or in part) by Micron Technology, Inc., Micron Semiconductor Products, Inc., Micron Technology Texas, LLC and/or their affiliates ("Micron"), that have the same or similar structures, features, or functionalities as the exemplary product shown in Exhibits B-1 through B-6, regardless of how such products are branded. Flash memory products include SSDs, microSD/SD cards, and thumb drives. As described in Exhibits B-1 through B-6, Dell-Micron Accused Products each infringe one or more claims of U.S. Patent Nos. 8,421,195 (claims 1-3, 5-6), 9,190,502 (claims 7-8, 11), 10,510,842 (claims 1-2, 4-5, 7-10, 12-13, 15-18), 10,734,481 (claims 1-4, 6-9, 13, 15-16, 20, 22-24, 26-27, 31-33), 11,121,222 (claims 1-4, 6-9, 13, 15-17, 20-21, 23-25, 27-28, 32-34, 38-42, 44), 11,316,014 (claims 1-4, 6-9, 13, 15-17, 20-21, 23-25, 27-28). Dell-Micron Accused Products include Precision Fixed Workstations, Precision

Mobile Workstations, Latitude, Optiplex, XPS Desktops, XPS Notebooks, Vostro Desktops, Inspiron Desktops, Inspiron Netbooks, Alienware Desktops, and Alienware Notebooks.

**3. Dell-WD Accused Products**

"Dell-WD Accused Products" include all Dell Products containing or comprising flash memory designed or manufactured (in whole or in part) by Western Digital Corporation, Western Digital Technologies, Inc., HGST, Inc., SanDisk LLC, SanDisk Holdings LLC, SanDisk Technologies LLC and/or their affiliates ("Western Digital" or "WD") that have the same or similar structures, features, or functionalities as the exemplary product shown in Exhibits C-1 through C-6, regardless of how such products are branded, regardless of how such products are branded. As described in Exhibits C-1 through C-6, Dell-WD Accused Products each infringe one or more claims of U.S. Patent Nos. 8,421,195 (claims 1-3, 5-6), 9,190,502 (claims 7-11), 10,510,842 (claims 1-2, 4-5, 7-10, 12-13, 15-18), 10,734,481 (claims 1-4, 6-9, 13, 15-16, 20, 22-24, 26-27, 31-33), 11,121,222 (claims 1-4, 6-9, 13, 15-17, 20-21, 23-25, 27-28, 32-34, 38-42, 44), 11,316,014 (claims 1-4, 6-9, 13, 15-17, 20-21, 23-25, 27-28). Flash memory products include SSDs, microSD/SD cards, and thumb drives. Exemplary Dell-WD Accused Products are listed below. All images were taken from dell.com.

Compare

Western Digital

WD Blue 3D NAND SATA SSD WDS500G2B0B - Solid state drive - 500 GB - internal - M.2 2280 - SATA 6Gb/s

★★★★☆ 4.4 (22)

Estimated Value ~~$79.99~~

**$74.99** You Save $5.00 (6%)

Temporarily Out of Stock

Dell Business Credit
As low as $15/mo.^ | Apply for credit

Get up to $2 back in rewards

View Details

Compare

Western Digital

WD Blue 3D NAND SATA SSD WDS100T2B0B - Solid state drive - 1 TB - internal - M.2 2280 - SATA 6Gb/s

★★★★½ 4.6 (17)

Estimated Value ~~$129.99~~

**$117.99** You Save $12.00 (9%)

Get it as soon as **Wednesday, May 4**
View Delivery Dates for 95050

Dell Business Credit
As low as $15/mo.^ | Apply for credit

Get up to $3 back in rewards

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View Details

Compare

Western Digital

WD Blue 3D NAND SATA SSD WDS200T2B0B - Solid state drive - 2 TB - internal - M.2 2280 - SATA 6Gb/s

Estimated Value ~~$263.99~~

**$243.99** You Save $20.00 (8%)

Get it as soon as **Wednesday, May 4**
View Delivery Dates for 95050

Dell Business Credit
As low as $15/mo.^ | Apply for credit

Get up to $7 back in rewards

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View Details

Compare

Western Digital

WD Blue 3D NAND SATA SSD WDS200T2B0A - Solid state drive - 2 TB - internal - 2.5-inch - SATA 6Gb/s

Estimated Value ~~$269.99~~

**$229.99** You Save $40.00 (15%)

Get it as soon as **Wednesday, May 4**
View Delivery Dates for 95050

Dell Business Credit
As low as $15/mo.^ | Apply for credit

Get up to $6 back in rewards

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View Details

Call or Chat

Compare

SanDisk

SanDisk SSD PLUS - Solid state drive - 120 GB - internal - 2.5-inch - SATA 6Gb/s

**$91.99**

Get it as soon as **Monday, May 9**
View Delivery Dates for 95050

Dell Business Credit
As low as $15/mo.^ | Apply for credit

Get up to $2 back in rewards

Add to Cart

View Details

Compare

Western Digital

WD Blue 3D NAND SATA SSD WDS400T2B0A - Solid state drive - 4 TB - internal - 2.5-inch - SATA 6Gb/s

Estimated Value ~~$597.99~~

**$449.99** You Save $148.00 (25%)

Get it as soon as **Wednesday, May 4**
View Delivery Dates for 95050

Dell Business Credit
As low as $15/mo.^ | Apply for credit

Get up to $13 back in rewards

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View Details

Compare

Western Digital

WD Black SN850 NVMe SSD WDS500G1X0E - Solid state drive - 500 GB - internal - M.2 2280 - PCI Express 4.0 x4 (NVMe)

Estimated Value ~~$137.99~~

**$122.99** You Save $15.00 (11%)

Get it as soon as **Wednesday, May 4**
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Dell Business Credit
As low as $15/mo.^ | Apply for credit

Get up to $3 back in rewards

Add to Cart

View Details

Compare

SanDisk

SanDisk Extreme Portable - Solid state drive - 500 GB - external (portable) - USB 3.1 Gen 2

Estimated Value ~~$139.99~~

**$119.99** You Save $20.00 (14%)

Get it as soon as **Wednesday, May 4**
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Dell Business Credit
As low as $15/mo.^ | Apply for credit

Get up to $3 back in rewards

Add to Cart

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Compare

Western Digital

WD Black SN850 NVMe SSD WDS100T1X0E - Solid state drive - 1 TB - internal - M.2 2280 - PCI Express 4.0 x4 (NVMe)

Estimated Value ~~$237.99~~
**$227.99** You Save $10.00

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Dell Business Credit
As low as $15/mo.^ | Apply for credit

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Add to Cart

View Details

Compare

Western Digital

WD Red SA500 NAS SATA SSD WDS200T1R0A - Solid state drive - 2 TB - internal - 2.5-inch - SATA 6Gb/s

Estimated Value ~~$356.99~~
**$249.99** You Save $107.00 (30%)

Temporarily Out of Stock

Dell Business Credit
As low as $15/mo.^ | Apply for credit

Get up to $7 back in rewards

View Details

Compare

Western Digital

WD Red SA500 NAS SATA SSD WDS100T1R0B - Solid state drive - 1 TB - internal - M.2 2280 - SATA 6Gb/s

Estimated Value ~~$175.99~~
**$119.99** You Save $56.00 (32%)

Temporarily Out of Stock

Dell Business Credit
As low as $15/mo.^ | Apply for credit

Get up to $3 back in rewards

View Details

Compare

Western Digital

WD Red SA500 NAS SATA SSD WDS500G1R0A - Solid state drive - 500 GB - internal - 2.5-inch - SATA 6Gb/s

Estimated Value ~~$93.99~~
**$79.99** You Save $14.00 (15%)

Temporarily Out of Stock

Dell Business Credit
As low as $15/mo.^ | Apply for credit

Get up to $2 back in rewards

View Details

Call or Chat

Compare

Western Digital

WD Red SA500 NAS SATA SSD WDS400T1R0A - Solid state drive - 4 TB - internal - 2.5-inch - SATA 6Gb/s

Estimated Value ~~$687.99~~
**$549.99** You Save $138.00 (20%)

Temporarily Out of Stock

Dell Business Credit
As low as $17/mo.* | Apply for credit

Get up to $16 back in rewards

View Details

Compare

Western Digital

WD Red SA500 NAS SATA SSD WDS100T1R0A - Solid state drive - 1 TB - internal - 2.5-inch - SATA 6Gb/s

Estimated Value ~~$178.99~~
**$129.99** You Save $49.00 (27%)

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Dell Business Credit
As low as $15/mo.^ | Apply for credit

Get up to $3 back in rewards

Add to Cart

View Details

Compare

SanDisk

SanDisk Ultra - USB flash drive - 32 GB - USB 3.0

**$12.99**

Get it as soon as **Wednesday, May 4**
View Delivery Dates for 95050

Add to Cart

View Details

Compare

SanDisk

SanDisk Cruzer Glide - USB flash drive - 128 GB - USB 2.0 - black, red

★★★★½ 4.6 (10)

**$37.99**

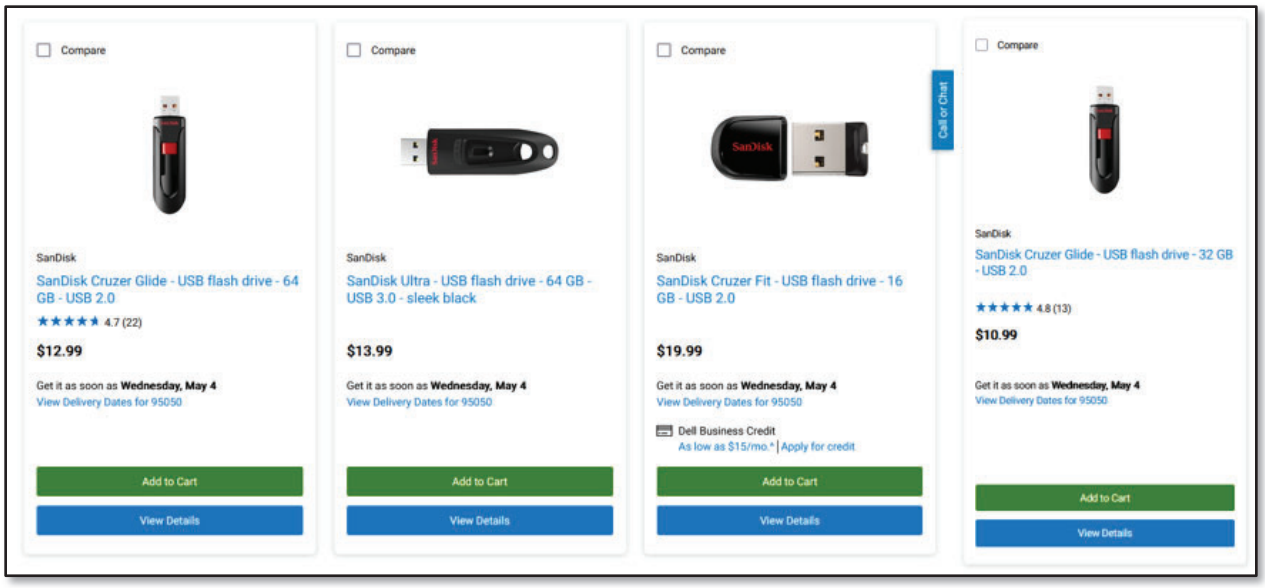
Get it as soon as **Wednesday, May 4**
View Delivery Dates for 95050

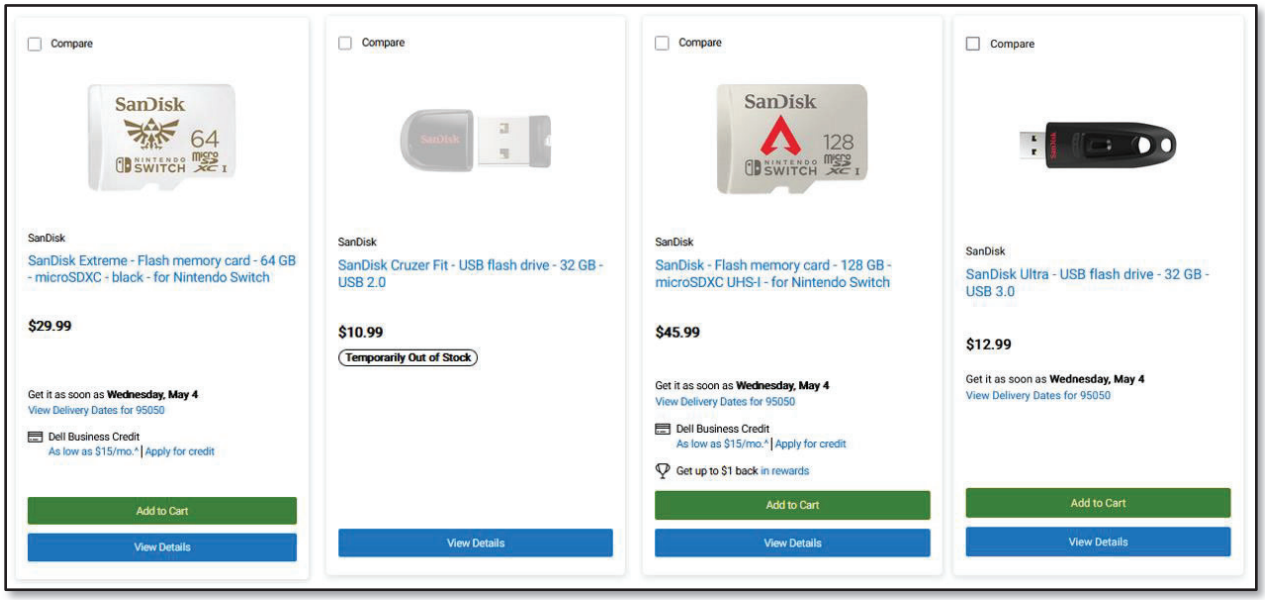
Dell Business Credit
As low as $15/mo.* | Apply for credit

Get up to $1 back in rewards

Add to Cart

View Details


Compare
SanDisk
SanDisk Cruzer Glide - USB flash drive - 64 GB - USB 2.0
4.7 (22)
$12.99
Get it as soon as Wednesday, May 4
View Delivery Dates for 95050
Add to Cart
View Details
Compare
SanDisk
SanDisk Ultra - USB flash drive - 64 GB - USB 3.0 - sleek black
$13.99
Get it as soon as Wednesday, May 4
View Delivery Dates for 95050
Add to Cart
View Details
Compare
Call or Chat
SanDisk
SanDisk Cruzer Fit - USB flash drive - 16 GB - USB 2.0
$19.99
Get it as soon as Wednesday, May 4
View Delivery Dates for 95050
Dell Business Credit
As low as $15/mo.* | Apply for credit
Add to Cart
View Details
Compare
SanDisk
SanDisk Cruzer Glide - USB flash drive - 32 GB - USB 2.0
4.8 (13)
$10.99
Get it as soon as Wednesday, May 4
View Delivery Dates for 95050
Add to Cart
View Details


Compare
SanDisk
64
NINTENDO SWITCH
SanDisk
SanDisk Extreme - Flash memory card - 64 GB - microSDXC - black - for Nintendo Switch
$29.99
Get it as soon as Wednesday, May 4
View Delivery Dates for 95050
Dell Business Credit
As low as $15/mo.* | Apply for credit
Add to Cart
View Details
Compare
SanDisk
SanDisk Cruzer Fit - USB flash drive - 32 GB - USB 2.0
$10.99
Temporarily Out of Stock
View Details
Compare
SanDisk
128
NINTENDO SWITCH
SanDisk
SanDisk - Flash memory card - 128 GB - microSDXC UHS-I - for Nintendo Switch
$45.99
Get it as soon as Wednesday, May 4
View Delivery Dates for 95050
Dell Business Credit
As low as $15/mo.* | Apply for credit
Get up to $1 back in rewards
Add to Cart
View Details
Compare
SanDisk
SanDisk Ultra - USB flash drive - 32 GB - USB 3.0
$12.99
Get it as soon as Wednesday, May 4
View Delivery Dates for 95050
Add to Cart
View Details

Compare

SanDisk
SanDisk Ultra - flash memory card - 64 GB

**$14.99**

Get it as soon as **Wednesday, May 4**
View Delivery Dates for 95050

Add to Cart
View Details

Compare

SanDisk
SanDisk Extreme - Flash memory card - 128 GB - microSDXC - black - for Nintendo Switch

**$29.99**

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SanDisk Ultra Dual Drive Luxe - USB flash drive - 32 GB - USB 3.1 Gen 1 / USB-C

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SanDisk Extreme Portable - Solid state drive - 2 TB - external (portable) - USB 3.1 Gen 2

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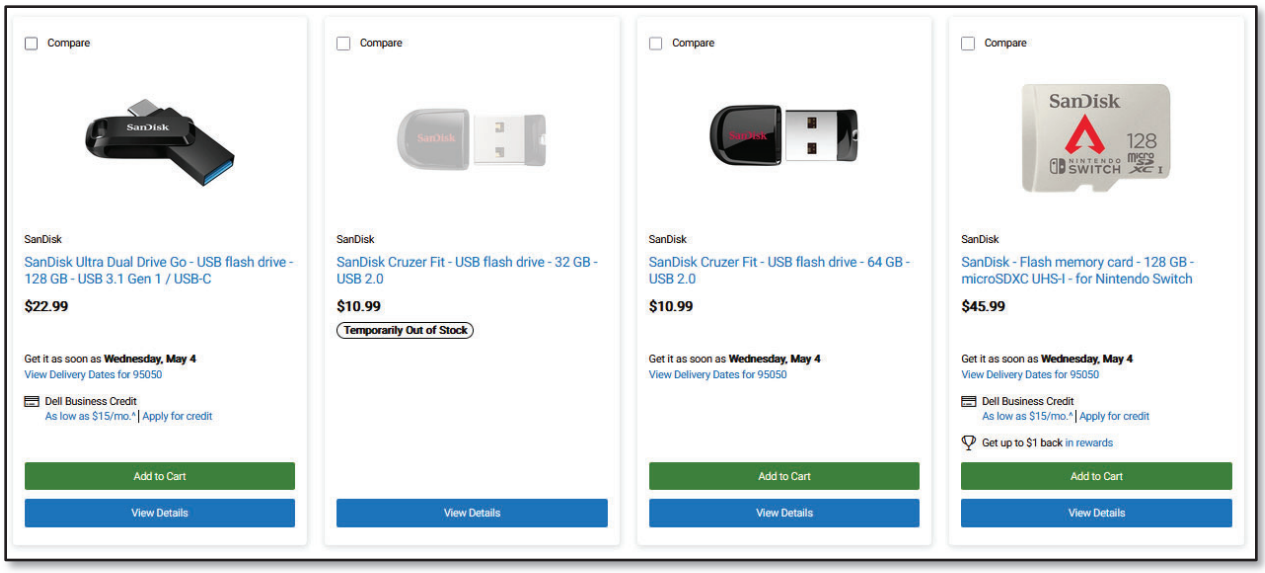
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SanDisk Ultra Dual Drive Go - USB flash drive - 128 GB - USB 3.1 Gen 1 / USB-C
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SanDisk Cruzer Fit - USB flash drive - 32 GB - USB 2.0
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SanDisk Cruzer Fit - USB flash drive - 64 GB - USB 2.0
$10.99
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SanDisk
SanDisk - Flash memory card - 128 GB - microSDXC UHS-I - for Nintendo Switch
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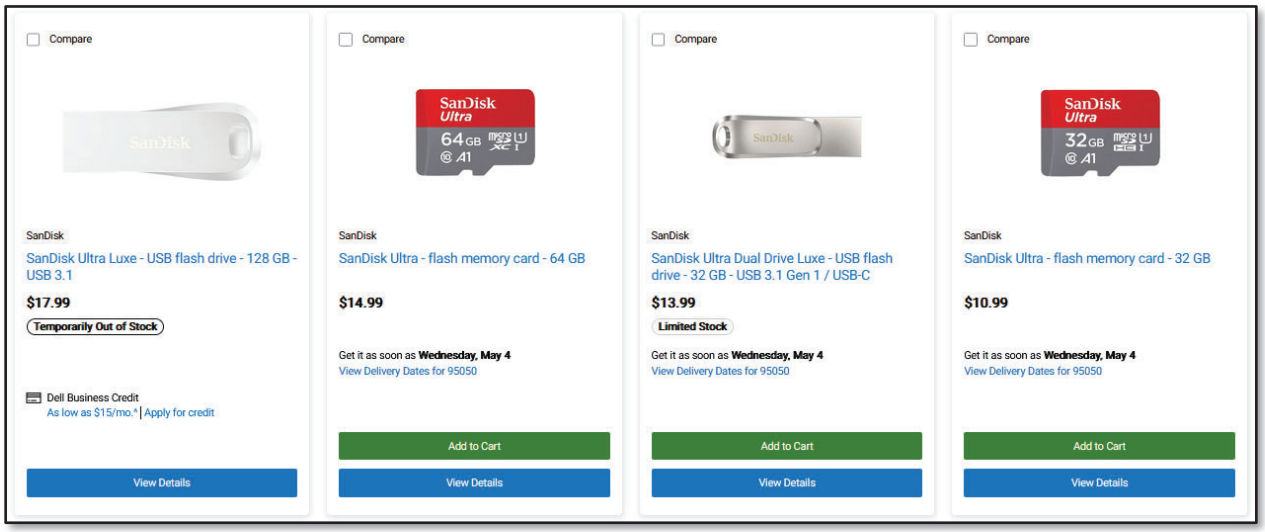
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SanDisk
SanDisk Ultra Luxe - USB flash drive - 128 GB - USB 3.1
$17.99
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SanDisk
SanDisk Ultra - flash memory card - 64 GB
$14.99
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SanDisk
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SanDisk

SanDisk Max Endurance - Flash memory card (microSDXC to SD adapter included) - 128 GB - Video Class V30

**$59.99**

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SanDisk

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**$18.99**

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SanDisk

SanDisk Ultra Dual Drive Luxe - USB flash drive - 64 GB - USB 3.1 Gen 1 / USB-C

**$16.99**

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SanDisk Ultra Dual Drive Luxe - USB flash drive - 1 TB - USB 3.1 Gen 1 / USB-C

**$149.99**

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SanDisk Ultra Luxe - USB flash drive - 16 GB - USB 3.1 Gen 1

**$10.99**

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SanDisk

SanDisk Ultra - USB flash drive - 64 GB - USB 3.0 - sleek black

**$26.99**

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SanDisk

SanDisk Ultra - USB flash drive - 128 GB - USB 3.0 - sleek black

**$44.99**

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Dell Business Credit
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SanDisk

SanDisk Ultra Fit - USB flash drive - 512 GB - USB 3.1 Gen 1

**$109.99**

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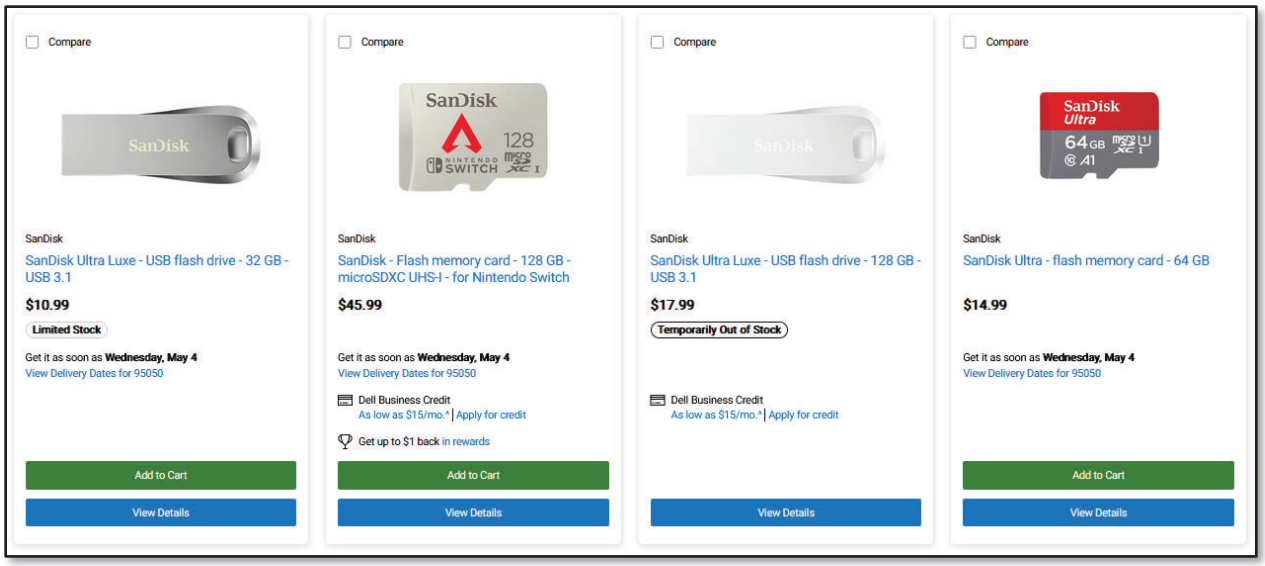
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SanDisk
SanDisk Ultra Luxe - USB flash drive - 32 GB - USB 3.1
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Limited Stock
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SanDisk Ultra Luxe - USB flash drive - 128 GB - USB 3.1
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SanDisk Ultra - flash memory card - 64 GB
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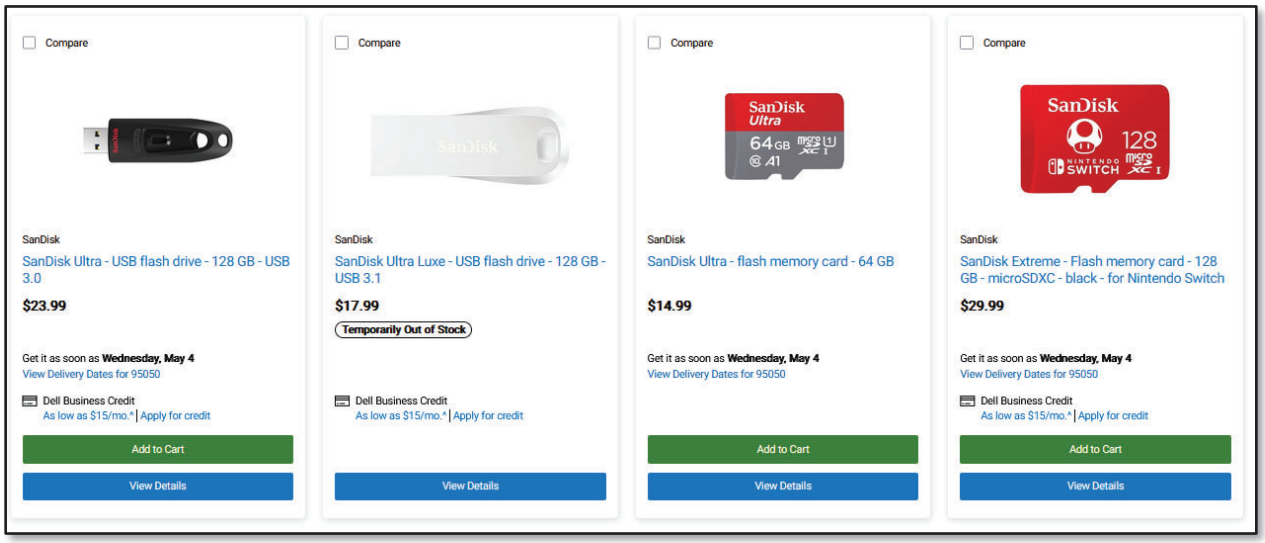
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SanDisk
SanDisk Ultra - USB flash drive - 128 GB - USB 3.0
$23.99
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$29.99
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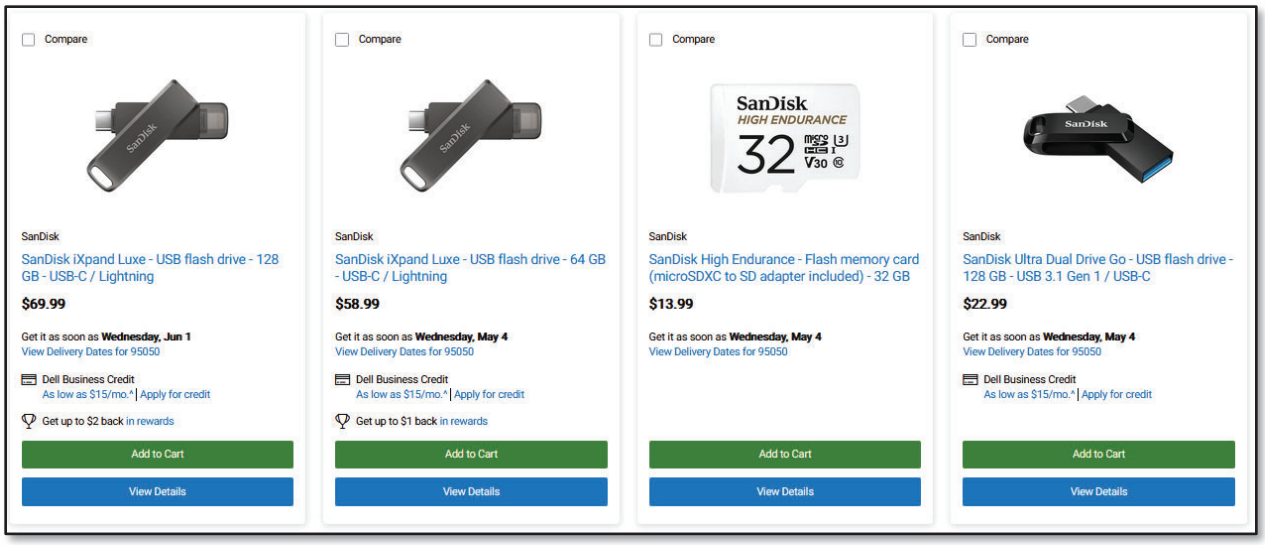
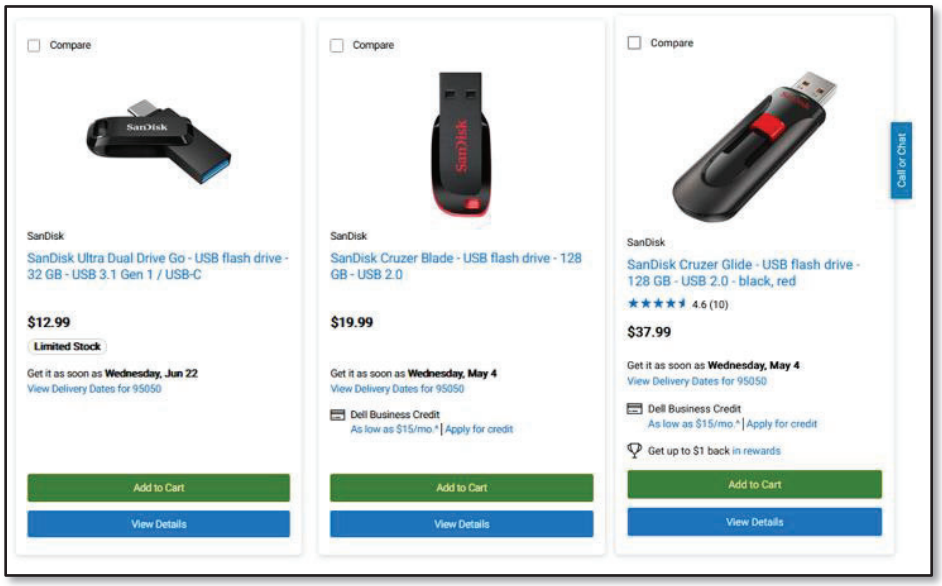
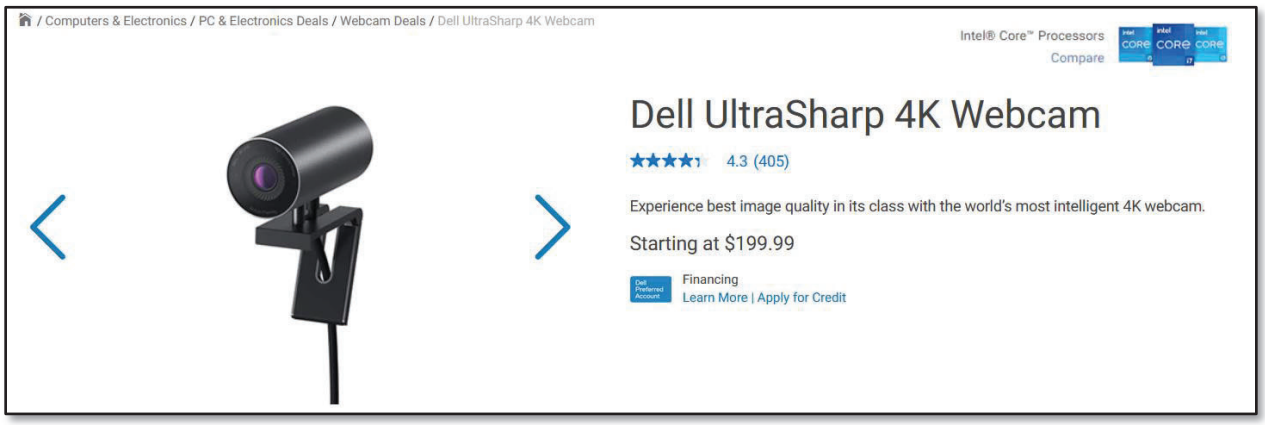


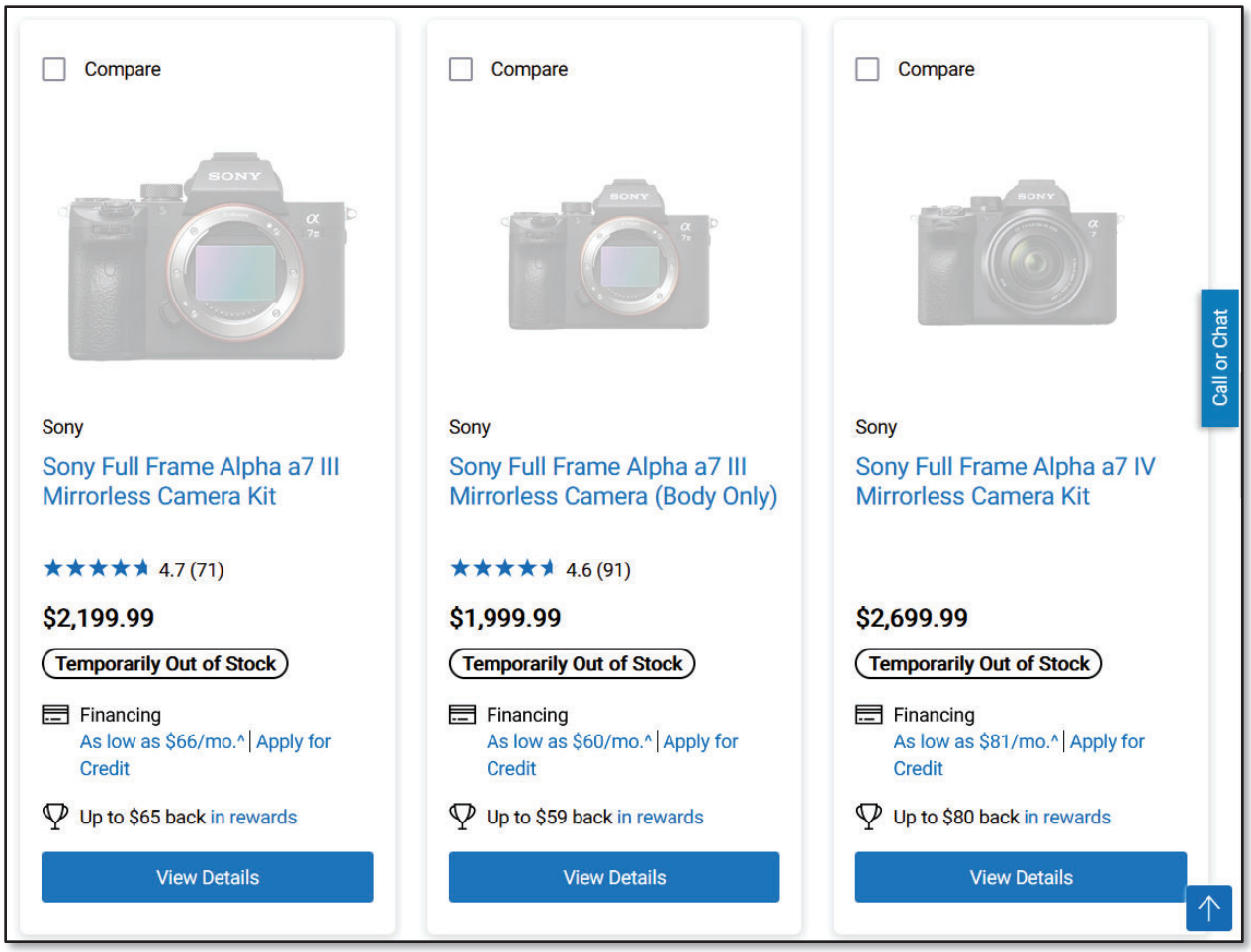




### 4. Dell-Sony Accused Products

Dell-Sony Accused Products include all Dell Products containing or comprising image sensors designed or manufactured (in whole or in part) by Sony Corporation, Sony Semiconductor Solutions, Sony Global Manufacturing & Operations, Sony Electronics Inc., Sony Corporation of America or their affiliates ("Sony"), that have the same or similar structures, features, or functionalities as the exemplary product shown in Exhibits D-1, D-2, D-3 and D-6, regardless of

how such products are branded. As described in Exhibits D-1, D-2, D-3, and D-6, Dell-Sony Accused Products each infringe one or more claims of U.S. Patent Nos. 10,510,842 (claims 1-2, 5, 7-10, 13, 15-18), 10,734,481 (claims 1-2, 4, 6-9, 13, 19-20, 22, 24, 26-27, 31, 36), 11,121,222 (claims 1-2, 4, 6-9, 13, 19-21, 23, 25, 27-28, 32, 37-39, 41), 11,316,014 (claims 1-2, 4, 6-9, 13, 19-21, 23, 25, 27-28). Exemplary Dell-Sony Accused Products are listed below. All images are taken from dell.com.






Upon information and belief, Dell also incorporates further Sony image sensors into other Dell Products, such as webcams that Dell integrates into Dell laptops, desktops, and other computing devices. Greenthread reserves the right to amend its list of Dell-Sony Accused Products, including based on information learned in discovery.

### 5. Additional Dell Accused Products

Upon information and belief, the following Dell products infringe one or more asserted claims of the asserted patents through their incorporation of dynamic random access memories (DRAMs), flash memory devices (e.g., in solid-state drives) and image sensors that meet the limitations of one or more asserted claims. The identities of such DRAMs, flash memory devices,

and image sensors, their specifications, and their manufacturers and/or suppliers (if other than Dell) are in the possession of the Dell Defendants and are expected to be learned over the course of this litigation, e.g., obtained through discovery. More complete information about the Accused Products is in the possession of Defendants and is expected to be obtained through discovery. Greenthread explicitly reserves the right to supplement or alter its preliminary identification of accused products, as a matter of right, as permitted by the Court, based on the Court's claim constructions, based on additional information obtained through formal discovery or other means, and/or based on other circumstances.

## III. CLAIM CHARTS FOR LITERAL INFRINGEMENT

Based upon information presently available to it, Greenthread's preliminary infringement claim charts are provided as attached Exhibits A-1 through A-6, B-1 through B-6, C-1 through C-6, and D-1, D-2, D-3, and D-6. In each claim chart, the discussion for dependent claims should be read as incorporating by reference the discussion corresponding to the claims from which they depend. In addition, the discussion for each row in the chart should be read within the context of the discussion for the entire claim to which that row pertains. Where the charts incorporate excerpts of particular documents, the reference to those excerpts is exemplary and not to the exclusion of any other excerpt or version of the document or any versions of related documents.

These infringement claim charts are based upon Greenthread's investigation to date. More complete information about the Accused Products is in the possession of Defendants and is expected to be obtained through discovery. Greenthread explicitly reserves the right to supplement or alter its preliminary infringement claim charts, as a matter of right, as permitted by the Court, based on the Court's claim constructions, based on additional information obtained through formal discovery or other means, and/or based on other circumstances.

## IV. DOCTRINE OF EQUIVALENTS

Unless otherwise noted in the claim charts, Greenthread alleges that Defendants infringe literally all asserted claims. To the extent any differences are alleged to exist between the asserted claims and Defendants' Accused Products, such differences are insubstantial and Defendants' Accused Products perform substantially the same function, in substantially the same way, to yield substantially the same result, and therefore Defendants infringe under the doctrine of equivalents.

Greenthread explicitly reserves the right to supplement or alter its disclosure concerning the doctrine of equivalents, as a matter of right, as permitted by the Court, based on the Court's claim constructions, based on additional information obtained through formal discovery or other means, and/or based on other circumstances. In the event that a claim limitation is deemed to be missing under a literal infringement analysis, Greenthread also reserves the right to demonstrate the presence of a substantial equivalent of such limitation and to pursue infringement under the doctrine of equivalents.

## V. DOCUMENT PRODUCTION

Accompanying these amended preliminary infringement contentions, Greenthread is producing documents pursuant to § II, page 2 of the Court's Standing Order Governing Proceedings (OGP) 4.1—Patent Cases dated April 14, 2022 in the production range GREENTHREAD-WDTX-000001-002065, including (1) documents evidencing conception and reduction to practice for each claimed invention at GREENTHREAD-WDTX-000349-000367, GREENTHREAD-WDTX-000741-000759, GREENTHREAD-WDTX-001061-001095, GREENTHREAD-WDTX-001249-001283, GREENTHREAD-WDTX-001378-001416, GREENTHREAD-WDTX-001727-001857, GREENTHREAD-WDTX-002026-002051; and (2) a copy of the file history for each patent in suit at the following:

| Patent | File History Production Range |
|---|---|
| ’842 patent | GREENTHREAD-WDTX-001059-1246 |
| ’481 patent | GREENTHREAD-WDTX-001247-1375 |
| ’222 patent | GREENTHREAD-WDTX-001376-1649 |
| ’195 patent | GREENTHREAD-WDTX-000349-739 |
| ’502 patent | GREENTHREAD-WDTX-000740-905 |
| ’014 patent | GREENTHREAD-WDTX-001866-2065 |

Dated: April 29, 2022.

**MCKOOL SMITH, P.C.**

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Telecopier: 512-692-8744

Kaitlyn M. Dawson
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Telephone: 713-485-7300
Telecopier: 713-485-7344

*Attorneys for Plaintiff Greenthread, LLC*

## CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served on the following counsel of record on April 29, 2022 via electronic mail using the following contact information.

| | |
|---|---|
| J. Stephen Ravel<br>Texas State Bar No. 16584975<br>**KELLY HART &HALLMAN LLP**<br>Email: steve.ravel@kellyhart.com | Gregory S. Arovas (Pro Hac Vice filed)<br>Robert A. Appleby (Pro Hac Vice filed)<br>Todd M. Friedman (Pro Hac Vice filed)<br>Leslie M. Schmidt (Pro Hac Vice filed)<br>Jon R. Carter (Pro Hac Vice filed)<br>Christopher DeCoro (Pro Hac Vice filed)<br>**KIRKLAND & ELLIS LLP**<br>601 Lexington Avenue<br>New York, NY 10022<br>Email: greg.arovas@kirkland.com<br>Email: robert.appleby@kirkland.com<br>Email: todd.friedman@kirkland.com<br>Email: leslie.schmidt@kirkland.com<br>Email: jon.carter@kirkland.com<br>Email: christopher.decoro@kirkland.com<br><br>Nyika O. Strickland (*Pro Hac Vice* filed)<br>**KIRKLAND & ELLIS LLP**<br>300 North LaSalle Street<br>Chicago, IL 60654<br>Email: nyika.strickland@kirkland.com<br><br>Abigail Lauer Litow (*Pro Hac Vice* filed)<br>John R. Rhine (*Pro Hac Vice* filed)<br>**KIRKLAND & ELLIS LLP**<br>1301 Pennsylvania Avenue, N.W.<br>Washington, D.C. 20004<br>Email: abigail.litow@kirkland.com<br>Email: john.rhine@kirkland.com<br><br>Bao Nguyen (*Pro Hac Vice* filed)<br>**KIRKLAND & ELLIS LLP**<br>555 California Street 27th Floor<br>San Francisco, CA 94104<br>Email: bao.nguyen@kirkland.com |

/s/ *Alan L. Whitehurst*
Alan L. Whitehurst