
From: David Bluestone <david.bluestone@bfkn.com>
Sent: Wednesday, December 6, 2023 8:15 AM
To: Nicholas T. Matich
Cc: Greenthread-Omnivision-MS
Subject: Re: Omnivision Response to Common Rog No. 11

Dear Nick,

Greenthread is in the best position to address its own license agreements and whether OmniVision is a beneficiary in some manner. Please let us know which OmniVision products Greenthread believes are already licensed.

It is premature for OmniVision to take a position as to which OmniVision products may be licensed. OmniVision still does not know what structures in the OV24A1Q are alleged to infringe and Greenthread presented no contentions for any other products. Our answer addresses patent exhaustion generally.

Concerning the OV9282, please answer the following:

- Was the OV9282 identified in any infringement contentions in any prior cases?
- Was the Intel product in which you believe an OV9282 was present identified in any infringement contentions or accused of infringement in any prior cases?
- When did Greenthread learn that the OV9282 was in the Intel product?
- What is your basis for asserting that OmniVision sold this chip to Intel?
- To what extent does Greenthread contend that the OV9282 is licensed?

Regards,

Dave

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From: Nicholas T. Matich <nmatich@McKoolSmith.com>
Date: Tuesday, November 28, 2023 at 4:08 PM
To: David Bluestone <david.bluestone@bfkn.com>

Cc: Greenthread-Omnivision-MS <Greenthread-Omnivision-MS@mckoolsmith.com>

Subject: Omnivision Response to Common Rog No. 11

Dave,

Omnivision's response to Common Interrogatory No. 11 states "to the extent that Greenthread has licensed parties that incorporate OmniVision products, Greenthread's patent rights are exhausted as to those products." Can you tell me which products and which licensees your answer refers to? Does this include sales to Intel, [REDACTED] If so which products?

Does Omnivision assert that the OV9282 image sensor sold to Intel is licensed?

Sincerely,
Nick

McKool Smith

Nicholas T. Matich

Principal

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