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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

SEMICONDUCTOR DESIGN TECHNOLOGIES, LLC, *Plaintiff,* v. CADENCE DESIGN SYSTEMS, INC., *Defendant.*	Case No. 3:23-cv-01001-AMO **PLAINTIFF'S DISCLOSURE OF ASSERTED CLAIMS AND INFRINGEMENT CONTENTIONS PURSUANT TO PATENT LOCAL RULES 3-1 AND 3-2**

Cadence Design Systems, Inc. - Ex. 1016, Page 00001
IPR2024-00024 (Cadence Design Systems, Inc. v. Semiconductor Design Technologies, LLC)

Plaintiff Semiconductor Design Technologies, LLC ("Plaintiff" or "SDT") serves this Disclosure of Asserted Claims and Initial Infringement Contentions ("Infringement Contentions") in accordance with Patent Local Rules ("P.L.R." or "Patent Local Rule(s)") 3-1 and 3-2 regarding infringement by Defendant Cadence Design Systems, Inc. ("Defendant" or "Cadence") of U.S. Patent Nos. 7,603,636 (the "'636 Patent") and 7,971,167 (the "'167 Patent") (collectively, "the Asserted Patents"). This disclosure is accompanied by a document production as required by P.L.R. 3-2.

SDT bases this Disclosure on its current knowledge, understanding, and belief as to the facts and information available as of the date of this Disclosure. SDT has not yet completed its investigation, collection of information, discovery, or analysis relating to this action, and additional discovery, including discovery from Defendants and third parties, may lead SDT to amend, revise, and/or supplement this Disclosure. SDT specifically reserves the right to amend, revise and/or supplement this Disclosure and/or accompanying exhibits in accordance with any Orders of record in this matter, and Federal Rule of Civil Procedure 26(e), as additional documents, source code, and information become available and as discovery and investigation proceed. SDT reserves the right to supplement, modify or amend this Disclosure to include additional products or services made, used, sold, or offered for sale in or imported into the United States by Defendants.

SDT reserves the right to supplement this Disclosure and exhibits based on decisions by the Court regarding claim construction. The information in this Disclosure is not an admission regarding the scope of any claims or the proper construction of those claims or any terms contained therein. SDT reserves the right to supplement its infringement contentions upon identification or receipt of additional documents, including documents from third parties. SDT further reserves the right to introduce and use such supplemental materials at trial.

I. INFRINGEMENT CONTENTIONS

SDT's infringement contentions are attached hereto as Exhibits A-1, A-2, and B-1. At this stage, SDT provides charts for the following claims of the Asserted Patents:

- '636 Patent: 1, 7, 8, 13, 14 (Exhibits A-1 and A-2) and

- ’167 Patent: 1-4 (Exhibit B-1).

II. IDENTIFICATION OF THE PRIORITY DATE FOR EACH CLAIM OF THE ASSERTED PATENTS

Based on currently available information, SDT identifies the earliest priority dates for the asserted claims of the Asserted Patents as follows:

- ’636 Patent: September 30, 2004 and
- ’167 Patent: February 19, 2007.

SDT’s investigation relating to the conception and reduction to practice of the patented inventions is ongoing and SDT therefore reserves the right to supplement and/or modify these dates as discovery in this case continues.

III. DATES OF INFRINGEMENT AND DAMAGES

Based on currently available information, SDT identifies the following dates of first infringement, start of the claimed damages, and end of claimed damages for the Asserted Patents:

Patent	Date of First Infringement	Start of Claimed Damages	End of Claimed Damages
’636 patent	February 25, 2015	March 6, 2017	Damages are ongoing
’167 patent	February 25, 2015	March 6, 2017	Damages are ongoing

Cadence has had full knowledge of the Asserted Patents no later than November 2, 2020 or December 11, 2020 based upon Cadence’s receipt of various letters sent by Ricoh Company, Ltd., the former owner of the Asserted Patents, to Cadence senior personnel, specifically informing Cadence of the Asserted Patents and the applicability to Cadence’s EDA business and products. SDT’s investigation relating to Cadence’s infringement and damages is ongoing and it therefore reserves the right to supplement and/or modify as discovery in this case continues.

IV. DOCUMENT PRODUCTION

Pursuant to P.L.R. 3-2, Plaintiff identifies documents corresponding to the following categories by production number below:

Category of Documents	Production Bates Numbers
P.L.R. 3-2(a): Documents (e.g., contracts, purchase orders, invoices, advertisements, marketing materials, offer letters, beta site testing agreements, and third party of joint development agreements) sufficient to evidence each discussion with, disclosure to, or other manner of providing to a third party, or sale of or offer to sell, the claimed invention prior to the date of application for the patent in suit. Plaintiff's production of any documents as required herein shall not constitute an admission that such document evidences or is prior art under 35 U.S.C. § 102.	SDT00000597 – SDT00000611
P.L.R. 3-2(b): All documents evidencing the conception, reduction to practice, design, and development of each claimed invention, which were created on or before the date of application for the patent in suit or the priority date identified pursuant to P.L.R. 3-1(f), whichever is earlier.	Documents of this type will be produced insofar as Plaintiff has them. Plaintiff's investigation is ongoing, and it reserves the right to produce documents as discovery in this case continues.
P.L.R. 3-2(c): A copy of the file history for each patent in suit.	SDT00000045 – SDT00000364, SDT00000381 – SDT00000596
P.L.R. 3-2(d): All documents evidencing ownership of the patent rights by the party asserting patent infringement.	SDT00000612 – SDT00000627
P.L.R. 3-2(f): All agreements, including licenses, transferring an interest in any patent-in-suit.	SDT00000628 – SDT00000659
P.L.R. 3-2(e): If a party identifies instrumentalities pursuant to Patent L.R. 3-1(g), documents sufficient to show the operation of any aspects or elements of such instrumentalities the patent claimant relies upon as embodying any asserted claims.	N/A Plaintiff's investigation is ongoing, and it reserves the right to produce documents as discovery in this case continues.
P.L.R. 3-2(f): All agreements, including licenses, transferring an interest in any patent-in-suit.	Plaintiff's investigation is ongoing, and it reserves the right to produce

	documents as discovery in this case continues.
P.L.R. 3-2(g): All agreements that the party asserting infringement contends are comparable to a license that would result from a hypothetical reasonable royalty negotiation.	Plaintiff's investigation is ongoing, and it reserves the right to produce documents as discovery in this case continues.
P.L.R. 3-2(h): All agreements that otherwise may be used to support the party asserting infringement's damages case.	Plaintiff's investigation is ongoing, and it reserves the right to produce documents as discovery in this case continues.
P.L.R. 3-2(i): If a party identifies instrumentalities pursuant to Patent L.R. 3-1(g), documents sufficient to show marking of such embodying accused instrumentalities and if it wants to preserve the right to recover lost profits based on such products, sales, revenues, costs, and profits of such embodying accused instrumentalities.	N/A Plaintiff's investigation is ongoing, and it reserves the right to produce documents as discovery in this case continues.
P.L.R. 3-2(j): All documents comprising or reflecting a F/RAND commitment or agreement with respect to the asserted patent(s).	N/A Plaintiff's investigation is ongoing, and it reserves the right to produce documents as discovery in this case continues.

Dated: September 14, 2023

By: */s/ Robert F. Kramer*

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Cadence Design Systems, Inc. - Ex. 1016, Page 00006

CERTIFICATE OF SERVICE

I am a resident of the State of California, over the age of eighteen years, and not a party to the within action. My business address is Kramer Alberti Lim & Tonkovich LLP, 577 Airport Boulevard, Suite 250, Burlingame, California 94010.

On September 14, 2023, I caused the foregoing document described as: **PLAINTIFF'S DISCLOSURE OF ASSERTED CLAIMS AND INFRINGEMENT CONTENTIONS PURSUANT TO NORTHERN DISTRICT OF CALIFORNIA PATENT LOCAL RULES 3-1 AND 3-2** to be served upon the following, at the addresses stated below, via the method of service indicated below:

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Attorneys for Defendant
Cadence Design Systems, Inc.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on September 14, 2023, in San Francisco, California.

/s/ Morgan Nguyen
Morgan Nguyen