

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

NETWORK SYSTEM TECHNOLOGIES, LLC,	)	
	)	
Plaintiff,	)	
	)	
v.	)	
	)	
QUALCOMM INCORPORATED;	)	Civil Action No. 1:22-cv-1331
QUALCOMM TECHNOLOGIES, INC.;	)	
ARTERIS, INC.,	)	JURY TRIAL DEMANDED
	)	
Defendants.	)	
	)	
	)	

THIRD AMENDED INITIAL DISCLOSURES BY
NETWORK SYSTEM TECHNOLOGIES, LLC

Plaintiff Network System Technologies, LLC (“Plaintiff”) hereby submits its Third Amended Initial Disclosures pursuant to Federal Rule of Civil Procedure 26(a)(1) and the Court’s Scheduling Order (Dkt. 73).

I. INTRODUCTORY STATEMENT

These disclosures are based on a reasonable investigation by and information reasonably available to Plaintiff as of the present date, and represent Plaintiff’s good-faith effort to identify information pertaining to the allegations of its First Amended Complaint. (Dkt. 57.) Plaintiff anticipates that further investigation, discovery, research, and analysis may supply additional facts, documents, or theories, or meaning, context, or clarification to known facts, which may have a bearing on the claims, defenses, and issues in this case. In addition, Qualcomm Incorporated and Qualcomm Technologies, Inc. (collectively, “Qualcomm”), and Arteris, Inc. (“Arteris”) (collectively, “Defendants”) may assert new claims or defenses, or modify, supplement, or otherwise alter their positions during this case. Therefore, Plaintiff reserves the right to amend or supplement these disclosures at any time before trial.

Plaintiff makes these disclosures without waiving, in any respect, the right to object to the use of any such information, for any purpose, in whole or in part, in any subsequent stage or proceeding in this action or any other action, or any other discovery proceeding involving or relating to the subject matter of these disclosures, on the grounds of competency, privilege, relevancy, materiality, hearsay, or any other proper ground.

II. INITIAL DISCLOSURES

A. The Correct Names of the Parties to the Lawsuit

Network System Technologies, LLC is the correct name of the plaintiff to this case.

Qualcomm Incorporated, Qualcomm Technologies, Inc., and Arteris, Inc. are the correct names of the defendants to this case.

B. The Name, Address, and Telephone Number of Any Potential Parties

Qualcomm CDMA Technologies Asia-Pacific (“QCTAP”) and Qualcomm Global Trading (“QGT”) should be added as defendants, and NST has moved for leave to file its Second Amended Complaint in part to add them as defendants. *See* NST’s Motion for Leave to File Second Amended Complaint (Dkt. 136).

C. The Legal Theories and, in General, the Factual Bases of the Disclosing Party’s Claims or Defenses (the Disclosing Party Need Not Marshal All Evidence that May Be Offered at Trial)

Plaintiff provides the following brief description of its legal theories and, in general, the factual bases for its claims based upon information available to Plaintiff at this time. Discovery has just begun, and Plaintiff expects to discover additional information that may be relevant to its legal theories and claims. Plaintiff reserves the right to supplement, amend, and correct the following disclosures as necessary.

Plaintiff owns the entire right, title, and interest in and to each of the following patents (collectively, “Asserted Patents”), including the right to seek damages for past and ongoing infringement:

- United States Patent No. 7,366,818 (the “’818 patent”), entitled “INTEGRATED CIRCUIT COMPRISING A PLURALITY OF PROCESSING MODULES AND A NETWORK AND METHOD FOR EXCHANGING DATA USING SAME.” The ’818 patent was duly and legally issued on April 29, 2008, naming Andrei Radulescu and Kees Gerard Willem Goossens as inventors.
- United States Patent No. 7,373,449 (the “’449 patent”), entitled “APPARATUS AND METHOD FOR COMMUNICATING IN AN INTEGRATED CIRCUIT.” The ’449

patent was duly and legally issued on May 13, 2008, naming Andrei Radulescu and Kees Gerard Willem Goossens as inventors.

- United States Patent No. 7,594,052 (the “’052 patent”), entitled “INTEGRATED CIRCUIT AND METHOD OF COMMUNICATION SERVICE MAPPING.” The ’052 patent was duly and legally issued on September 22, 2009, naming Andrei Radulescu and Kees Gerard Willem Goossens as inventors.
- United States Patent No. 7,769,893 (the “’9893 patent”), entitled “INTEGRATED CIRCUIT AND METHOD FOR ESTABLISHING TRANSACTIONS.” The ’9893 patent was duly and legally issued on August 3, 2010, naming Kees Gerard Willem Goossens as inventor.
- United States Patent No. 8,072,893 (the “’2893 patent”), entitled “INTEGRATED CIRCUIT WITH DATA COMMUNICATION NETWORK AND IC DESIGN METHOD.” The ’2893 patent was duly and legally issued on December 6, 2011, naming John Dielissen and Edwin Rijpkema as inventors.

The Asserted Patents are valid and enforceable.

Defendants have been and are infringing the Asserted Patents directly and/or indirectly as set forth in the Complaint, by making, using, offering to sell, selling and/or importing infringing products within the United States, including in the Western District of Texas. *See* 35 U.S.C. § 271(a); *see also* 35 U.S.C. § 271(g).

Defendants, with knowledge of the Asserted Patents, are actively, knowingly, and/or intentionally inducing and contributing to the infringement of the Asserted Patents by others. *See* 35 U.S.C. § 271(b)–(c).

Details relating to Defendants’ infringement of the Asserted Patents have been disclosed to Defendants as part of Plaintiff’s disclosures of asserted claims and infringement contentions pursuant to the applicable rules and orders, and any amendments and/or supplements thereof, which are incorporated herein by reference in their entirety.

Defendants’ infringement has been and continues to be willful.

Defendants have been on notice of the Asserted Patents at least since the filing of the original Complaint (Dkt. 1), which is incorporated by reference herein, and/or as of the earlier dates of knowledge alleged in the First Amended Complaint (Dkt. 57). Defendants have been on notice of the Asserted Patents since at least late 2013, evidence of which includes emails from 2013 and 2014 between Governing Dynamics and Qualcomm's then Senior Vice President and Chief of IP Strategy, Roger Martin, regarding discussions surrounding, and technical evaluations of, a portfolio of Philips patents that included the five Asserted Patents now owned by plaintiff NST.

Plaintiff has incurred and will continue to incur substantial damages and be irreparably harmed by Defendants' infringement.

Plaintiff's infringement claims will be the subject of expert testimony, and Plaintiff will make the required expert disclosures according to the deadlines set forth by the Court. Those disclosures, when made, are also hereby incorporated by reference in their entirety.

D. The Name, Address, and Telephone Number of Persons Having Knowledge of Relevant Facts, a Brief Statement of Each Identified Person's Connection with the Case, and a Brief, Fair Summary of the Substance of the Information Known by Any Such Person

Plaintiff believes the following individuals may have knowledge of relevant facts that Plaintiff may use in support of its claims and defenses. The issues are not yet fully developed because discovery and Plaintiff's investigation are ongoing. Accordingly, Plaintiff reserves the right to amend this list and/or identify additional individuals at a later date:

Name	Address and Telephone Number	Connection with the Case and Summary of the Substance of Information Known
Kees Gerard Willem Goossens	Professor Goossens may be contacted through counsel for NST	• Inventor of one or more of the Asserted Patents • Conception and reduction to practice of the inventions of one or

		more of the Asserted Patents • Pre-suit knowledge of Koninklijke Philips N.V. (“Philips”), Philips NoC technology, and the Asserted Patents by Arteris and Qualcomm
Andrei Radulescu	On information and belief, Eindhoven, Netherlands area	• Inventor of one or more of the Asserted Patents • Conception and reduction to practice of the inventions of one or more of the Asserted patents • Pre-suit knowledge of Philips, Philips NoC technology, and the Asserted Patents by Arteris, Inc. and Qualcomm
John Dielissen	On information and belief, Eindhoven, Netherlands area	• Inventor of one or more of the Asserted Patents • Conception and reduction to practice of the inventions of one or more of the Asserted Patents • Pre-suit knowledge of Philips, Philips NoC technology, and the Asserted Patents by Arteris and Qualcomm
Edwin Rijpkema	On information and belief, Ridderkerk, Netherlands area	• Inventor of one or more of the Asserted Patents • Conception and reduction to practice of the inventions of one or more of the Asserted Patents • Pre-suit knowledge of Philips, Philips NoC technology, and the Asserted Patents by Arteris and Qualcomm
Thomas Loureiro	Mr. Loureiro may be contacted through counsel for NST	• President of Plaintiff, Network System Technologies, LLC • Ownership of the Asserted Patents
Willem Houck	Mr. Houck may be contacted through counsel for NST	• Philips, Philips NoC technology, and Phillips’ licensing practices • Pre-suit knowledge of the Asserted Patents by Qualcomm and Samsung
Ruud Peters	Mr. Peters may be contacted through counsel for NST	• Philips, Philips NoC technology, and Phillips’ licensing practices

K. Charles Janac	On information and belief, through counsel for Arteris	• President and CEO of Arteris • Structure, function and operation of Arteris and Qualcomm Accused Products • Quality, value, usability, demand, importance, benefits, advantages, and performance of products covered by the Asserted Patents • Infringement of the Asserted Patents by Arteris and Qualcomm • Relationship between, and collaboration with, Philips • Pre-suit knowledge of Philips, Philips NoC technology, the Asserted Patents, and the inventors of the Asserted Patents by Arteris and Qualcomm • Pre-suit knowledge of Arteris and Qualcomm's infringement of the Asserted Patents • Acquisition of Arteris technology and hiring of Arteris employees by Qualcomm • Arteris relationship with Qualcomm • Use of Arteris technology by Qualcomm • Arteris's IPO
Laurent Moll	On information and belief, through counsel for Arteris	• COO of Arteris • Structure, function and operation of Arteris and Qualcomm Accused Products • Quality, value, usability, demand, importance, benefits, advantages, and performance of products covered by the Asserted Patents • Infringement of the Asserted Patents by Arteris and Qualcomm • Relationship between, and collaboration with, Philips • Pre-suit knowledge of Philips, Philips NoC technology, the Asserted Patents, and the inventors of the Asserted Patents by Arteris

		- and Qualcomm • Pre-suit knowledge of Arteris and Qualcomm's infringement of the Asserted Patents • Acquisition of Arteris technology and hiring of Arteris employees by Qualcomm • Arteris relationship with Qualcomm • Use of Arteris technology by Qualcomm • Arteris's IPO
Alain Fanet	On information and belief, Paris France area	• Co-Founder and former CEO of Arteris • Structure, function and operation of Arteris and Qualcomm Accused Products • Quality, value, usability, demand, importance, benefits, advantages, and performance of products covered by the Asserted Patents • Infringement of the Asserted Patents by Arteris and Qualcomm • Relationship between, and collaboration with, Philips • Pre-suit knowledge of Philips, Philips NoC technology, the Asserted Patents, and the inventors of the Asserted Patents by Arteris and Qualcomm • Pre-suit knowledge of Arteris and Qualcomm's infringement of the Asserted Patents
Philippe Boucard	On information and belief, through counsel for Qualcomm	• Co-founder of Arteris; current employee of Qualcomm • Structure, function and operation of Arteris and Qualcomm Accused Products • Quality, value, usability, demand, importance, benefits, advantages, and performance of products covered by the Asserted Patents • Infringement of the Asserted Patents by Arteris and Qualcomm

		• Relationship between, and collaboration with, Philips • Pre-suit knowledge of Philips, Philips NoC technology, the Asserted Patents, and the inventors of the Asserted Patents by Arteris and Qualcomm • Pre-suit knowledge of Arteris and Qualcomm's infringement of the Asserted Patents
Kurt Shuler	On information and belief, Valencia Spain area	• Former VP of Marketing for Arteris • Structure, function and operation of Arteris and Qualcomm Accused Products • Quality, value, usability, demand, importance, benefits, advantages, and performance of products covered by the Asserted Patents • Infringement of the Asserted Patents by Arteris and Qualcomm • Relationship between, and collaboration with, Philips • Pre-suit knowledge of Philips, Philips NoC technology, the Asserted Patents, and the inventors of the Asserted Patents by Arteris and Qualcomm • Pre-suit knowledge of Arteris and Qualcomm's infringement of the Asserted Patents • Acquisition of Arteris technology and hiring of Arteris employees by Qualcomm • Arteris relationship with Qualcomm • Use of Arteris technology by Qualcomm • Arteris's IPO
Philippe Martin	On information and belief, Nice France area	• Former CTO of Arteris • Structure, function and operation of Arteris and Qualcomm Accused Products • Quality, value, usability, demand,

		importance, benefits, advantages, and performance of products covered by the Asserted Patents • Infringement of the Asserted Patents by Arteris and Qualcomm • Relationship between, and collaboration with, Philips • Pre-suit knowledge of Philips, Philips NoC technology, the Asserted Patents, and the inventors of the Asserted Patents by Arteris and Qualcomm • Pre-suit knowledge of Arteris and Qualcomm's infringement of the Asserted Patents • Acquisition of Arteris technology and hiring of Arteris employees by Qualcomm • Arteris relationship with Qualcomm • Use of Arteris technology by Qualcomm • Arteris's IPO
Benoit de Lescure	On information and belief, through counsel for Arteris	• CTO at Arteris • Structure, function and operation of Arteris and Qualcomm Accused Products • Quality, value, usability, demand, importance, benefits, advantages, and performance of products covered by the Asserted Patents • Infringement of the Asserted Patents by Arteris and Qualcomm • Relationship between, and collaboration with, Philips • Pre-suit knowledge of Philips, Philips NoC technology, the Asserted Patents, and the inventors of the Asserted Patents by Arteris and Qualcomm • Pre-suit knowledge of Arteris and Qualcomm's infringement of the Asserted Patents • Acquisition of Arteris technology

		and hiring of Arteris employees by Qualcomm • Arteris relationship with Qualcomm • Use of Arteris technology by Qualcomm • Arteris's IPO
Nicolas J. Pauley	On information and belief, through counsel for Qualcomm	• Pre-suit knowledge of Philips, Philips NoC technology, the Asserted Patents, and the inventors of the Asserted Patents by Arteris and Qualcomm • Pre-suit knowledge of Arteris and Qualcomm's infringement of the Asserted Patents
Peter Kamarchik	On information and belief, Raleigh, North Carolina	• Pre-suit knowledge of Philips, Philips NoC technology, the Asserted Patents, and the inventors of the Asserted Patents by Arteris and Qualcomm • Pre-suit knowledge of Arteris and Qualcomm's infringement of the Asserted Patents
Eric B. Meyertons	On information and belief, West Lake Hills, Texas	• Pre-suit knowledge of Philips, Philips NoC technology, the Asserted Patents, and the inventors of the Asserted Patents by Arteris and Qualcomm • Pre-suit knowledge of Arteris and Qualcomm's infringement of the Asserted Patents
John Ciccozzi	On information and belief, Alexandria, Virginia	• Pre-suit knowledge of Philips, Philips NoC technology, the Asserted Patents, and the inventors of the Asserted Patents by Arteris and Qualcomm • Pre-suit knowledge of Arteris and Qualcomm's infringement of the Asserted Patents
Jubin Dana	On information and belief,	• Pre-suit knowledge of Philips, Philips NoC technology, the

	Menlo Park, California	Asserted Patents, and the inventors of the Asserted Patents by Arteris and Qualcomm • Pre-suit knowledge of Arteris and Qualcomm's infringement of the Asserted Patents
Khaled Labib	On information and belief, Campbell, California	• Pre-suit knowledge of Philips, Philips NoC technology, the Asserted Patents, and the inventors of the Asserted Patents by Arteris and Qualcomm • Pre-suit knowledge of Arteris and Qualcomm's infringement of the Asserted Patents
One or more representatives of Arteris, Inc.	On information and belief, 9601 Amberglen Boulevard, Suite 117, Austin, Texas 78729	• Possible indemnitor of Defendant Qualcomm, Inc. and Qualcomm Technologies, Inc. • Infringer of Asserted Patents • Structure, function and operation of Arteris and Qualcomm Accused Products • Revenues resulting from products covered by the Asserted Patents • Supply and distribution chains and channels for products covered by the Asserted Patents • Quality, value, usability, demand, importance, benefits, advantages, and performance of products covered by the Asserted Patents • Infringement of the Asserted Patents by Arteris and Qualcomm • Relationship between, and collaboration with, Philips • Pre-suit knowledge of Philips, Philips NoC technology, the Asserted Patents, and the inventors of the Asserted Patents by Arteris and Qualcomm • Pre-suit knowledge of Arteris and Qualcomm's infringement of the Asserted Patents • Acquisition of Arteris technology and hiring of Arteris employees by

		Qualcomm • Arteris relationship with Qualcomm • Use of Arteris technology by Qualcomm • Arteris's IPO
One or more representatives of Qualcomm, Inc.	On information and belief, 5775 Morehouse Drive, San Diego, California 92121	• Infringer of Asserted Patents • Structure, function and operation of Arteris and Qualcomm Accused Products • Revenues resulting from products covered by the Asserted Patents • Supply and distribution chains and channels for products covered by the Asserted Patents • Quality, value, usability, demand, importance, benefits, advantages, and performance of products covered by the Asserted Patents • Design, research, development, manufacture, structure, function, operation, testing, use, importation, commercialization, sales, pricing, and costs of products covered by the Asserted Patents • Infringement of the Asserted Patents by Arteris and Qualcomm • Relationship between, and collaboration with, Philips • Pre-suit knowledge of Philips, Philips NoC technology, the Asserted Patents, and the inventors of the Asserted Patents by Arteris and Qualcomm • Pre-suit knowledge of Arteris and Qualcomm's infringement of the Asserted Patents • Acquisition of Arteris technology and hiring of Arteris employees by Qualcomm • Arteris relationship with Qualcomm • Use of Arteris technology by

		Qualcomm
One or more representatives of Qualcomm Technologies, Inc.	On information and belief, 9600 N. Mopac, Suite 900, Stonebridge Plaza II, Austin, Texas 78759	• Infringer of Asserted Patents • Structure, function and operation of Arteris and Qualcomm Accused Products • Revenues resulting from products covered by the Asserted Patents • Supply and distribution chains and channels for products covered by the Asserted Patents • Quality, value, usability, demand, importance, benefits, advantages, and performance of products covered by the Asserted Patents • Design, research, development, manufacture, structure, function, operation, testing, use, importation, commercialization, sales, pricing, and costs of products covered by the Asserted Patents • Infringement of the Asserted Patents by Arteris and Qualcomm • Relationship between, and collaboration with, Philips • Pre-suit knowledge of Philips, Philips NoC technology, the Asserted Patents, and the inventors of the Asserted Patents by Arteris and Qualcomm • Pre-suit knowledge of Arteris and Qualcomm's infringement of the Asserted Patents • Acquisition of Arteris technology and hiring of Arteris employees by Qualcomm • Arteris relationship with Qualcomm • Use of Arteris technology by Qualcomm
One or more representatives of Qualcomm Global Trading Pte Ltd.	On information and belief, 6 Seragoon North Avenue 5, Singapore 554910,	• Infringer of Asserted Patents • Structure, function and operation of Arteris and Qualcomm Accused Products

	Singapore.	• Revenues resulting from products covered by the Asserted Patents • Supply and distribution chains and channels for products covered by the Asserted Patents • Quality, value, usability, demand, importance, benefits, advantages, and performance of products covered by the Asserted Patents • Design, research, development, manufacture, structure, function, operation, testing, use, importation, commercialization, sales, pricing, and costs of products covered by the Asserted Patents • Infringement of the Asserted Patents by Arteris and Qualcomm • Relationship between, and collaboration with, Philips • Pre-suit knowledge of Philips, Philips NoC technology, the Asserted Patents, and the inventors of the Asserted Patents by Arteris and Qualcomm • Pre-suit knowledge of Arteris and Qualcomm's infringement of the Asserted Patents • Acquisition of Arteris technology and hiring of Arteris employees by Qualcomm • Arteris relationship with Qualcomm • Use of Arteris technology by Qualcomm
One or more representatives of Qualcomm CDMA Technologies Asia-Pacific Pte Ltd.	On information and belief, 6 Seragoon North Avenue 5, Singapore 554910, Singapore.	• Infringer of Asserted Patents • Structure, function and operation of Arteris and Qualcomm Accused Products • Revenues resulting from products covered by the Asserted Patents • Supply and distribution chains and channels for products covered by the Asserted Patents

		• Quality, value, usability, demand, importance, benefits, advantages, and performance of products covered by the Asserted Patents • Design, research, development, manufacture, structure, function, operation, testing, use, importation, commercialization, sales, pricing, and costs of products covered by the Asserted Patents • Infringement of the Asserted Patents by Arteris and Qualcomm • Relationship between, and collaboration with, Philips • Pre-suit knowledge of Philips, Philips NoC technology, the Asserted Patents, and the inventors of the Asserted Patents by Arteris and Qualcomm • Pre-suit knowledge of Arteris and Qualcomm's infringement of the Asserted Patents • Acquisition of Arteris technology and hiring of Arteris employees by Qualcomm • Arteris relationship with Qualcomm • Use of Arteris technology by Qualcomm
One or more representative of Philips	On information and belief, Eindhoven, Netherlands	• Conception and reduction to practice of the inventions of one or more of the Asserted Patents • Quality, value, usability, demand, importance, benefits, advantages, and performance of products covered by the Asserted Patents • Pre-suit knowledge of Philips, Philips NoC technology, and the Asserted Patents by Arteris and Qualcomm • Pre-suit knowledge of Arteris and Qualcomm's infringement of the Asserted Patents • Relationship between Philips and

		Qualcomm Relationship between Philips and Arteris
One or more representatives of Samsung Electronics Co., Ltd, Samsung Electronics America, Inc., Samsung Austin Semiconductor, Inc. (collectively, “Samsung”); OnePlus Technology (Shenzhen) Co., Ltd. (“OnePlus”); Lenovo Group Ltd. (“Lenovo”)	On information and belief, through counsel for Samsung, OnePlus and Lenovo	- Infringers of Asserted Patents - Structure, function and operation of Arteris and Qualcomm Accused Products - Revenues resulting from products covered by the Asserted Patents - Supply and distribution chains and channels for products covered by the Asserted Patents - Quality, value, usability, demand, importance, benefits, advantages, and performance of products covered by the Asserted Patents
Other persons or entities that make, use, sell, offer for sale, and/or import products comprising one or more Qualcomm integrated circuits covered by the Asserted Patents	Unknown	- Infringers of Asserted Patents - Structure, function and operation of Arteris and Qualcomm Accused Products - Revenues resulting from products covered by the Asserted Patents - Supply and distribution chains and channels for products covered by the Asserted Patents - Quality, value, usability, demand, importance, benefits, advantages, and performance of products covered by the Asserted Patents
Kevin Ecker	On information and belief, through counsel for Philips: Robert Sweeney Mintz Levin, Chon, Ferris, Glovsky and Popeo, P.C. 1.617.348.1792 RCSweeney@mintz.com	Philips patent licenses and licensing
Roger Martin	On information and belief, San Diego, CA Area	Pre-suit knowledge of Philips, Philips NoC technology, and the Asserted Patents by Qualcomm

Alain Fawaz	On information and belief, through counsel for Qualcomm	• Structure, function and operation of Arteris and Qualcomm Accused Products • Design, research, development, manufacture, structure, function, operation, testing, use, importation, commercialization, sales, pricing, and costs of products covered by the Asserted Patents
Xavier LeLoup	On information and belief, through counsel for Qualcomm	• Structure, function and operation of Arteris and Qualcomm Accused Products • Design, research, development, manufacture, structure, function, operation, testing, use, importation, commercialization, sales, pricing, and costs of products covered by the Asserted Patents
Denise Csubak	On information and belief, through counsel for Qualcomm	• Supply and distribution chains and channels for products covered by the Asserted Patents
Alexis Boutillier	On information and belief, through counsel for Qualcomm	• Structure, function and operation of Arteris and Qualcomm Accused Products • Design, research, development, manufacture, structure, function, operation, testing, use, importation, commercialization, sales, pricing, and costs of products covered by the Asserted Patents
James Thompson	On information and belief, through counsel for Qualcomm	• Structure, function and operation of Arteris and Qualcomm Accused Products • Design, research, development, manufacture, structure, function, operation, testing, use, importation, commercialization, sales, pricing, and costs of products covered by the Asserted

		Patents
Akash Palkhiwala	On information and belief, through counsel for Qualcomm	Sales, marketing, distribution, commercialization, pricing, and costs of products covered by the Asserted Patents
Gilles Balillieu	On information and belief, through counsel for Qualcomm	- Structure, function and operation of Arteris and Qualcomm Accused Products - Design, research, development, manufacture, structure, function, operation, testing, use, importation, commercialization, sales, pricing, and costs of products covered by the Asserted Patents
Aaron Hogan	On information and belief, through counsel for Qualcomm	- Structure, function and operation of Arteris and Qualcomm Accused Products - Design, research, development, manufacture, structure, function, operation, testing, use, importation, commercialization, sales, pricing, and costs of products covered by the Asserted Patents
Don McGuire	On information and belief, through counsel for Qualcomm	Sales, marketing, distribution, commercialization, pricing, and costs of products covered by the Asserted Patents
Margaret “Peggy” Johnson	On information and belief, through counsel for Qualcomm	Sales, marketing, distribution, commercialization, pricing, and costs of products covered by the Asserted Patents
Valerio Filairo	On information and belief, through counsel for Qualcomm	Testing, assessment, marketing, distribution, and customer opinions of products covered by the Asserted Patents

By making these disclosures, Plaintiff does not waive and expressly reserves any and all

applicable privileges and/or work-product doctrines that may apply to any witness identified.

Plaintiff also anticipates calling one or more expert witnesses who may opine on subjects of patent infringement, validity, and/or damages.

Plaintiff expects that it may use testimony from as-yet unidentified employees and representatives of Defendants to support its claims or defenses. Defendants' employees and other representatives have knowledge regarding at least the design, development, operation, manufacture, sale, use, distribution, licensing, and profitability of the infringing products, as well as knowledge of the Asserted Patents and Defendants' infringement thereof.

Plaintiff incorporates by reference any witnesses identified or disclosed by any other party to this action and, notwithstanding the foregoing, reserves the right to call on any witnesses identified in this case, including through discovery.

E. Documents, Electronically Stored Information, and Tangible Things

Plaintiff identifies the following categories of documents that may be used to support its claims or defenses, and some of the identified categories are within the possession, custody, or control of Plaintiff or its counsel:

- The Asserted Patents and their respective file histories.
- Publicly available technical and promotion documents.
- Technical documentation from Defendants and third parties related to the design, research, development, manufacture, structure, function, operation, testing, and use of products covered by the Asserted Patents.
- Financial, marketing, and other documentation and materials from Defendants and third parties related to: the importation, commercialization, sales, pricing, and cost of products

covered by the Asserted Patents; revenues resulting from products covered by the Asserted Patents; supply and distribution chains and channels for products covered by the Asserted Patents and quality, value, usability, demand, importance, benefits, advantages, and performance of products covered by the Asserted Patents.

Plaintiff's description of documents is based solely upon such information and documents it has been able to discover thus far in the amount of time available, as well as its present analysis of the case, and shall not be deemed to be a representation that particular documents do or do not exist. Plaintiff reserves the right to rely on any and all discovery responses, admissions, documents, and things produced by any party or non-party in this action. Plaintiff also reserves the right to revise and/or supplement the foregoing at a later date as discovery proceeds.

F. Any Indemnity and Insuring Agreements Under Which Any Person or Entity Carrying on an Insurance Business May Be Liable to Satisfy Part or All of a Judgment Entered in this Action or to Indemnify or Reimburse for Payments Made to Satisfy the Judgment

Plaintiff is unaware of any insurance agreement under which an insurance business may be liable to satisfy all or part of a possible judgment in this action or to indemnify or reimburse for payments made to satisfy a judgment.

G. Any Settlement Agreements Relevant to the Subject Matter of this Action

On May 31, 2024 NST entered into two agreements (one with a third party, and one with Arteris). NST's litigation entitled *Network System Technologies, LLC v. Samsung Electronics Co., LTD. et al*, Case No. 2:22-cv-00481-JRG in the Eastern District of Texas was dismissed on July 1, 2024. NST's litigation entitled *Network System Technologies, LLC v. Texas Instruments Incorporated et al.*, Case No. 2:22-cv-00482-RWS in the Eastern District of Texas was dismissed on July 1, 2024.

H. Any Statement of Any Party to the Litigation

Plaintiff is currently unaware of any such statement.

I. Computation of Damages

Plaintiff seeks an injunction and all monetary relief available under the patent laws of the United States, including but not limited to actual and/or compensatory damages, reasonable royalties, pre-judgement and post-judgment interest, enhanced damages, costs pursuant to 35 U.S.C. § 284, attorney fees pursuant to 35 U.S.C. § 285, and ongoing royalties in an amount to be determined for any continued infringement after the date that judgment is entered, but in no event less than reasonable royalties for Defendants' use of the patented technology. Further, Plaintiff requires additional discovery and information from Defendants to provide a specific computation of damages.

Plaintiff anticipates providing its disclosure of computation of damages at the time for Expert Disclosures because it will rely on a damages expert. Plaintiff will make the required damages and expert disclosures according to the deadlines set by the Court, and those disclosures, when made, are also hereby incorporated by reference in their entirety.

Dated: August 6, 2024

Respectfully submitted,

/s/ William E. Davis, III

William E. Davis, III
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*Attorneys for Plaintiff Network System
Technologies, LLC*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing document was served via electronic mail on August 6, 2024 to counsel of record for the defendants.

/s/ Michael W. Gray
