

MOSAID TECHNOLOGIES INC.,
Plaintiff,
v.
MEDIATEK, INC., and
MEDIATEK USA, INC.,
Defendants.

Pursuant to Local Patent Rule 3-1, Plaintiff MOSAID Technologies Inc. (“Plaintiff” or “MOSAID”) hereby provides its Disclosure of Asserted Claims and Infringement Contentions concerning defendants MediaTek, Inc. (“MTK”) and MediaTek USA, Inc. (“MTK USA”) (MTK and MTK USA, collectively, “Defendants” or “MediaTek”).

DISCLOSURE OF ASSERTED CLAIMS AND INFRINGEMENT CONTENTIONS

I. Local Patent Rule 3-1(a): Asserted Claims

Subject to ongoing discovery and investigation, and based on available information obtained to date, MOSAID hereby contends that the Defendants infringe the following claims of the following patents (collectively, the “Asserted Claims”):

- U.S. Patent No. 7,051,306 (“the ’306 Patent”), Claims 1-51;
- U.S. Patent No. 7,945,885 (“the ’885 Patent”), Claims 1-64;
- U.S. Patent No. 7,996,811 (“the ’811 Patent”), Claims 1-74;
- U.S. Patent No. 8,253,438 (“the ’438 Patent”), Claims 1-4, 6-13, 15-16, and 18-19;
- U.S. Patent No. 8,854,077 (“the ’077 Patent”), Claims 1-18;
- U.S. Patent No. 9,350,349 (“the ’349 Patent”), Claims 1-4, and 6-16; and
- U.S. Patent No. 7,224,563 (“the ’563 Patent”), Claims 1-11, 23-24, and 31-35.

II. Local Patent Rule 3-1(b): Accused Instrumentalities

Subject to ongoing discovery and investigation, MOSAID contends that Defendants have infringed and continue to infringe the Asserted Claims:

- (i) under 35 U.S.C. § 271(a), by having made, used, sold, and/or offered for sale, continuing to make, use, offer to sell, and/or sell in the United States, and/or having imported and continuing to import into the United States, each of the Accused Instrumentalities listed below, as shown in Exhibits A–G;
- (ii) under 35 U.S.C. § 271(b), by (1) having induced and inducing Defendants’ customers and/or end users of the Accused Instrumentalities to have used and use the Accused Instrumentalities in a manner that infringed and infringes the Asserted Claims, as shown in Exhibits A-G, and (2) as to MTK, by having induced MTK USA, and inducing MTK USA, to have made, used, and/or offered for sale, continuing to make, use, offer to sell, and/or sell in the United States, and/or to have imported and to import into the United States, the Accused Instrumentalities; and
- (iii) under 35 U.S.C. § 271(c), by contributing to the infringement of the Asserted Claims by third parties, including for example Defendants’ customers and/or end-users of the Accused Instrumentalities.

The “Accused Instrumentalities” are processors made, used, sold, and/or offered for sale in the United States, and/or imported into the United States by Defendants, including but not limited to Defendants’ Helio and Dimensity line of products, as well as other substantially similar processors made, used, sold, and/or offered for sale in the United States, and/or imported into the United States by Defendants, or as a result of Defendants’ induced or contributory infringement. On information and belief, MOSAID currently asserts that the structure, functionality, and operation of each Accused Instrumentality is substantially similar for purposes of infringement of the Asserted Claims, and thus, the Helio or Dimensity products are representative of each Accused Instrumentality. Specifically, the Accused Instrumentalities include at least the following:

- Defendants’ Dimensity line of processors, including at least:
 - Dimensity 9000 Series
 - Dimensity 9000 (MT6983 MT6983Z/CZA);
 - Dimensity 9000+ (MT6983 MT6983W/CZA);
 - Dimensity 9200 (MT6985);
 - Dimensity 9200+ (MT6985);
 - Dimensity 8000 Series
 - Dimensity 8000 (MT6895 MT6895Z/CZA);
 - Dimensity 8020;
 - Dimensity 8050 (MT6893 MT6893Z_T/CZA);
 - Dimensity 8100 (MT6895Z MT6895Z/TCZA MT6895ZB);
 - Dimensity 8200 (MT6896 MT6896Z);
 - Dimensity 7000 Series
 - Dimensity 7020;
 - Dimensity 7050 (MT6877 MT6877V/TTZA);
 - Dimensity 7200 (MT6886);
 - Dimensity 6000 Series
 - Dimensity 6020 (MT6833 MT6833V/ZA);
 - Dimensity 6080 (MT6833 MT6833GP);

- Dimensity 1000 Series
 - Dimensity 1000C (MT6883Z/CZA);
 - Dimensity 1000L (MT6885Z/CZA);
 - Dimensity 1000 (MT6889);
 - Dimensity 1000+ (MT6889Z/CZA);
 - Dimensity 1050 (MT6879 MT6879V/ZA);
 - Dimensity 1080 (MT6877 MT6877V/TTZA);
 - Dimensity 1100 (MT6891 MT6891Z/CZA);
 - Dimensity 1200 (MT6893);
 - Dimensity 1300 (MT6893Z);
- Dimensity 900 Series
 - Dimensity 900 (MT6877 MT6877V/ZA);
 - Dimensity 920 (MT6877 MT6877T MT6877V/TZA);
 - Dimensity 930 (MT6855);
- Dimensity 800 Series
 - Dimensity 800 (MT6873);
 - Dimensity 800U (MT6853V/TNZA MT6853T);
 - Dimensity 810 (MT6833 MT6833V/PNZA MT6833P);
 - Dimensity 820 (MT6875)
- Dimensity 700 Series
 - Dimensity 700 (MT6833 MT6833V/ZA MT6833V/NZA);
 - Dimensity 720 (MT6853V/ZA MT6853V/NZA);
- Defendants' Helio line of processors, including at least:
 - Helio G Series
 - Helio G25 (MT6762G);
 - Helio G35 (MT6765G);
 - Helio G36;
 - Helio G37 (MT6765H);
 - Helio G70 (MT6769V/CB);
 - Helio G80 (MT6769T);
 - Helio G85 (MT6769Z);
 - Helio G88 (MT6769H);
 - Helio G90 (MT6785V/CD);
 - Helio G90T (MT6785V/CC);
 - Helio G95 (MT6785V/CD);
 - Helio G96 (MT6781 MT6781V/CD);
 - Helio G99 (MT6789 MT6789V/CD);

- Helio P Series
 - Helio P10 (MT6755/MT6755M);
 - Helio P15 (MT6755T);
 - Helio P18 (MT6755S);
 - Helio P20 (MT6757);
 - Helio P25/P25T (MT6757CD/6757T);
 - Helio P22 (MT6762);
 - Helio P23/P23T (MT6763/6763T);
 - Helio P30 (MT6758);
 - Helio P35 (MT6765);
 - Helio P60 (MT6771);
 - Helio P65 (MT6768);
 - Helio P70 (MT6771V/CT MT6771V/WT);
 - Helio P90 (MT6779V/CU);
 - Helio P95 (MT6779V/CV);
- Helio A Series
 - Helio A20 (MT6761V/WE);
 - Helio A22 (MT6761V/WAB MT6761V/WBB);
 - Helio A25 (MT6762V/WB MT6762V/WD).
- Helio X Series
 - Helio X10 (MT6795M/6795/6795T);
 - Helio X20 (MT6797);
 - Helio X23 (MT6797D);
 - Helio X25 (MT6797T);
 - Helio X27 (MT6797X); and
 - Helio X30 (MT6799).

The Accused Instrumentalities also include other substantially similar processors made, used, sold, and/or offered for sale in the United States, and/or imported into the United States by Defendants, or as a result of Defendants' induced or contributory infringement. For example, on information and belief, MOSAID currently believes that Defendants' Kompanio Series processors (Kompanio 500-MT8183, Kompanio 520, Kompanio 800T, Kompanio 820-MT8192, Kompanio 828, Kompanio 900T-MT8791, Kompanio 1200-MT8195, Kompanio 1380-MT8195T, and Kompanio 1300T-MT8797) and Pentonic Series processors (Pentonic 2000, Pentonic 1000, and Pentonic 700), as well as Defendants' processors for standalone applications and tablets (MT8317,

MT8317T, MT8377, MT8312, MT8321, MT8382, MT8117, MT8121, MT8125, MT8389, MT8389T, MT8135, MT8135V, MT8127, MT8151, MT8392, MT8735, MT8732, MT8752, MT8161, MT8163, MT8165, MT8166, MT8167A, MT8173, MT8176, MT8766, MT8768T/P22T, and MT8693), digital television System-on-Chips (“SoCs”) (MT5327, MT5329, MT5366, MT5389, MT5395, MT5396, MT5398, MT5505, MT5561, MT5580, MT5582, MT5592, MT5595, MT5596, MT 5597, MT9638, MT9675, MT9632, MT9602, MT9685, MT9612, MT9686, MT9652, MT9613, MT9950, MT5895 (S900), and MT9970A), certain wearable device SoCs (MT6572), and certain IoT SoCs (MT8362 and MT8385) may also infringe the Asserted Claims as MOSAID believes that the structure, functionality, and operation of such products may be substantially similar to the Helio and Dimensity line of products for purposes of infringement of the Asserted Claims.

MOSAID has previously provided Defendants with exemplar claim charts relating to the Asserted Patents, which charts are produced at MOSAID00007815–8171 and incorporated by reference herein. In addition, the attached Exhibits A–G set forth representative claim charts detailing how Defendants infringe with respect to the Accused Instrumentalities for the Asserted Claims. MOSAID reserves the right to supplement its disclosure and representative claim charts as new information becomes available in fact discovery.

III. Local Patent Rule 3-1(c): Preliminary Infringement Chart

Subject to ongoing discovery and investigation, and based on available information obtained to date, MOSAID contends that each element of the Asserted Claim is found within each Accused Instrumentality as shown in the infringement claim charts attached hereto as Exhibits A–G. To the extent that the Asserted Claims charted herein are method claims, MOSAID discloses that use of the Accused Instrumentalities involves performing the identified claim step or steps. MOSAID reserves the right to supplement and amend this Disclosure of Asserted Claims and

Infringement Contentions, including pursuant to Local Patent Rule 3-6 and ¶ 3 of the Court's default provisions as set forth in the Court's Sample Discovery Order For Patent Cases, including based on additional information obtained through discovery or other means concerning Defendants' products or services, including specifically source code related to each Accused Instrumentality.

Pursuant to ¶ 3 of the Court's default provisions as set forth in the Court's Sample Discovery Order For Patent Cases, MOSAID hereby asserts that one or more claim elements of the Asserted Claims constitute software limitations and MOSAID requires source code for the Accused Instrumentalities to fully identify specifically where such elements of the claim are found within the Accused Instrumentalities. Notwithstanding this limitation, MOSAID has endeavored to provide the information presently available to it in the attached Exhibits A-G. MOSAID reserves the right to supplement this Disclosure of Asserted Claims and Infringement Contentions within thirty (30) days after the relevant source code for each Accused Instrumentality is produced, whether produced by Defendants or, if necessary, relevant third parties.

IV. Local Patent Rule 3-1(d): Literal Infringement and Doctrine of Equivalents

MOSAID asserts that each element of the Asserted Claims is literally present in each Accused Instrumentality. To the extent that any element of the Asserted Claims is found not to be literally present in any Accused Instrumentality, MOSAID asserts that such element of the Asserted Claims is present under the doctrine of equivalents in such Accused Instrumentality.

V. Local Patent Rule 3-1(e): Priority Date

MOSAID contends that the Asserted Claims have a priority date as follows:

- The Asserted Claims of the '306 Patent are entitled to a priority date of May 7, 2003 based on Provisional Application No. 60/468,742, filed on May 7, 2003;
- The Asserted Claims of the '885 Patent are entitled to a priority date of May 7, 2003 based on Provisional Application No. 60/468,742, filed on May 7, 2003;

- The Asserted Claims of the '811 Patent are entitled to a priority date of May 7, 2003 based on Provisional Application No. 60/468,742, filed on May 7, 2003;
- The Asserted Claims of the '438 Patent are entitled to a priority date of February 19, 2004 based on Provisional Application No. 60/546,574, filed on February 19, 2004. In addition, the Asserted Claims of the '438 Patent are entitled to an invention date as least as early as December 11, 2003;
- The Asserted Claims of the '077 Patent are entitled to a priority date of February 19, 2004 based on Provisional Application No. 60/546,574, filed on February 19, 2004. In addition, the Asserted Claims of the '438 Patent are entitled to an invention date as least as early as December 11, 2003;
- The Asserted Claims of the '349 Patent are entitled to a priority date of February 19, 2004 based on Provisional Application No. 60/546,574, filed on February 19, 2004. In addition, the Asserted Claims of the '438 Patent are entitled to an invention date as least as early as December 11, 2003; and
- The Asserted Claims of the '563 Patent are entitled to a priority date of June 20, 2003 based on Provisional Application No. 60/480,056, filed on June 20, 2003.

VI. Local Patent Rule 3-1(f): Practicing Apparatus, Product, Device, Method, Act, or Other Instrumentality

MOSAID does not presently intend to rely on the assertion that its own apparatus, product, device, process, method, act, or other instrumentality practices the claimed inventions of the Asserted Patents.

VII. Local Patent Rule 3-2: Document Production Accompanying Disclosure

Pursuant to Local Patent Rule 3-2, MOSAID is producing and/or making available for inspection and copying documents contemporaneously with service of this Disclosure of Asserted Claims and Infringement Contentions.

MOSAID is not in possession of any Documents that correspond to Local Patent Rule 3-2(a).

Documents that correspond to Local Patent Rule 3-2(b) can be found in MOSAID's production, including at MOSAID00008172–268.

Documents that correspond to Local Patent Rule 3-2(c) can be found at in MOSAID's production, including at MOSAID00000151–3551.

Dated: July 6, 2023

Respectfully submitted,

/s/ Michael D. Karson

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CERTIFICATE OF SERVICE

I hereby certify that, on July 6, 2023, I electronically submitted the foregoing document to the following counsel of record for Defendants MediaTek, Inc. and MediaTek USA, Inc., pursuant to Rule 5(d) of the Federal Rules of Civil Procedure and Local Rule CV-5(c):

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