UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

DAEDALUS PRIME LLC, *Plaintiff*, v. MEDIATEK INC. *Defendant*.	Civil Action No. 2:24cv235 **JURY TRIAL DEMANDED**

PATENT LOCAL RULE 3.1 AND 3-2 DISCLOSURES

Pursuant to Patent Local Rule 3-1, Plaintiff Daedalus Prime LLC ("Daedalus" or "Plaintiff") hereby provides the following disclosures to defendant MediaTek Inc. ("MediaTek" or "Defendant").

Plaintiff does not have access to the source code, system architecture design documents, or other information through which these features are established, enabled and executed, and therefore reserves the right to amend or supplement these disclosures within a reasonable time after receiving access to, and an opportunity to review and analyze, Defendant's source code relating to these features.

MediaTek's infringements are also detailed in Plaintiff's Complaint, ECF No. 1, which is hereby incorporated by reference in its entirety.

U.S. PATENT NO. 8,769,316

Patent Local Rule 3-1(a): "Each claim of each patent in suit that is allegedly infringed by each opposing party."

Disclosure: Defendant infringes Claims 8, 9, 10, 11 and 12 (the "'316 Asserted Claims") of U.S. Patent No. 8,769,316 (the "'316 Patent").

Patent Local Rule 3-1(b): "Separately for each asserted claim, each accused apparatus, product, device, process, method, act, or other instrumentality ('Accused Instrumentality') of each opposing party of which the party is aware. This identification shall be as specific as possible. Each product, device, and apparatus must be identified by name or model number, if known. Each method or process must be identified by name, if known, or by any product, device, or apparatus which, when used, allegedly results in the practice of the claimed method or process."

Disclosure: For the '316 Asserted Claims, the '316 Patent Accused Products are SoCs or application processors ("APs") based on or derived from ARMv8.2 architecture, as well as subsequent revisions to the ARM architecture[1] such as the ARMv9 architecture, such as the Dimensity 9300 SoCs, and all reasonably similar products. As explained in Plaintiff's Complaint, Defendant infringes Claim 8 of the '316 Patent directly (including through making, using, selling, offering to sell, and importing into the United States the '316 Patent Accused Products) and by inducing consumers to use the '316 Patent Accused Products within the United States in the ordinary, customary, and intended way by, directly or through intermediaries, supplying the '316 Patent Accused Products to consumers within the United States and instructing and encouraging such customers to use the '316 Patent Accused Products in the ordinary, customary, and intended way.

Plaintiff's investigation to date indicates that SoCs or application processors based on or derived from ARMv8.2 architecture, as well as subsequent revisions to the ARM architecture such as the ARMv9 architecture include the devices identified below. On information and belief, Defendant makes, uses, sells, offers to sell, and/or imports into the United States (and induces customers and consumers to make, use, sell, offer to sell, or import into the United States) further electronic devices containing SoCs or microprocessors based on or derived from ARMv8.2

[1] All references to ARMv8.X or ARM 8.X herein or in any of the associated Exhibits, refer to ARMv8.2 and subsequent versions of the ARMv8 or ARMv9 architecture.

architecture, as well as subsequent revisions to the ARM architecture such as the ARMv9 architecture, in addition to those chips identified in **Table 1** below.

Accused Product	Model No.	Architecture	ARM ISA
Dimensity 700[2]	MT6833	2x Cortex-A76; 6x Cortex-A55	v8.2-A
Dimensity 800[3]	MT6873	4x Cortex-A76; 4x Cortex-A55	v8.2-A
Dimensity 810[4]	MT6833V	2x Cortex-A76; 6x Cortex-A55	v8.2-A
Dimensity 820[5]	MT6875	4x Cortex-A76; 4x Cortex-A55	v8.2-A
Dimensity 900[6]	MT6877	2x Cortex-A78; 6x Cortex-A55	v8.2-A
Dimensity 920[7]	MT6877T	2x Cortex-A78; 6x Cortex-A55	v8.2-A
Dimensity 930 [8]	MT6855	2x Cortex-A78; 6x Cortex-A55	v8.2-A
Dimensity 1000[9]	MT6889Z	4x Cortex-A77; 4x Cortex-A55	v8.2-A
Dimensity 1000C[10]	MT6883Z	4x Cortex-A77; 4x Cortex-A55	v8.2-A
Dimensity 1050[11]	MT6879	2x Cortex-A78; 6x Cortex-A55	v8.2-A
Dimensity 1080[12]	MT6877V	2x Cortex-A78; 6x Cortex-A55	v8.2-A
Dimensity 1100[13]	MT6891Z	4x Cortex-A78; 4x Cortex-A55	v8.2-A
Dimensity 1200[14]	MT6893	1x Cortex-A78; 3x Cortex-A78; 4x Cortex-A55	v8.2-A
Dimensity 1300[15]	MT6893Z	1x Cortex-A78; 3x Cortex-A78; 4x Cortex-A55	v8.2-A
Dimensity 6020[16]	MT6833	2x Cortex-A76; 6x Cortex-A55	v8.2-A
Dimensity 6080[17]	MT6833	2x Cortex-A76; 6x Cortex-A55	v8.2-A
Dimensity 6100+[18]	MT6835	2x Cortex-A76; 6x Cortex-A55	v8.2-A
Dimensity 6300[19]	MT6835T	2x Cortex-A76; 6x Cortex-A55	v8.2-A
Dimensity 7020[20]	MT6855	2x Cortex-A78; 6x Cortex-A55	v8.2-A

[2] https://www.mediatek.com/products/smartphones-2/dimensity-700
[3] https://www.mediatek.com/products/smartphones-2/dimensity-800
[4] https://www.mediatek.com/products/smartphones-2/mediatek-dimensity-810
[5] https://www.mediatek.com/products/smartphones-2/dimensity-820
[6] https://www.mediatek.com/products/tablets/mediatek-dimensity-900
[7] https://www.mediatek.com/products/smartphones-2/mediatek-dimensity-920
[8] https://www.mediatek.com/products/smartphones-2/mediatek-dimensity-930
[9] https://www.mediatek.com/products/smartphones-2/dimensity-1000-series
[10] https://www.mediatek.com/products/smartphones-2/dimensity-1000c
[11] https://www.mediatek.com/products/smartphones-2/mediatek-dimensity-1050
[12] https://www.mediatek.com/products/smartphones-2/mediatek-dimensity-1080
[13] https://www.mediatek.com/products/tablets/mediatek-dimensity-1100
[14] https://www.mediatek.com/products/smartphones-2/mediatek-dimensity-1200
[15] https://www.mediatek.com/products/smartphones-2/mediatek-dimensity-1300
[16] https://www.mediatek.com/products/smartphones-2/mediatek-dimensity-6020
[17] https://www.mediatek.com/products/smartphones-2/mediatek-dimensity-6080
[18] https://www.mediatek.com/products/smartphones-2/mediatek-dimensity-6100plus
[19] https://www.mediatek.com/products/smartphones-2/mediatek-dimensity-6300
[20] https://www.mediatek.com/products/smartphones-2/mediatek-dimensity-7020

Accused Product	Model No.	Architecture	ARM ISA
Dimensity 7025[21]	MT6855	2x Cortex-A78; 6x Cortex-A55	v8.2-A
Dimensity 7030[22]	MT8775	2x Cortex-A78; 6x Cortex-A55	v8.2-A
Dimensity 7050[23]	MT6877	2x Cortex-A78; 6x Cortex-A55	v8.2-A
Dimensity 7200[24]	MT6886	2x Cortex-A715; 6x Cortex-A510	v9-A
Dimensity 7200 Pro[25]	MT6886	2x Cortex-A715; 6x Cortex-A510	v9-A
Dimensity 7300/7300X[26]	MT6878	4x Cortex-A78; 4x Cortex-A55	v8.2-A
Dimensity 7350[27]		2x Cortex-A715; 6x Cortex-A510	v9-A
Dimensity 7350 Pro		2x Cortex-A715; 6x Cortex-A510	v9-A
Dimensity 8000[28]	MT6895	4x Cortex-A78; 4x Cortex-A55	v8.2-A
Dimensity 8020[29]	MT6891	4x Cortex-A78; 4x Cortex-A55	v8.2-A
Dimensity 8050[30]	MT6893	1x Cortex-A78; 3x Cortex-A78; 4x Cortex-A55	v8.2-A
Dimensity 8100[31]	MT6895Z	4x Cortex-A78; 4x Cortex-A55	v8.2-A
Dimensity 8200[32]	MT6896Z	1x Cortex-A78; 3x Cortex-A78; 4x Cortex-A55	v8.2-A
Dimensity 8200-Ultra		1x Cortex-A78; 3x Cortex-A78; 4x Cortex-A55	v8.2-A
Dimensity 8250[33]		1x Cortex-A78; 3x Cortex-A78; 4x Cortex-A55	v8.2-A
Dimensity 8300[34]	MT6897	1x Cortex-A715; 3x Cortex-A715; 4x Cortex-A510	v9-A
Dimensity 9000[35]	MT6983	1x Cortex-X2; 3x Cortex-A710; 4x Cortex-A510	v9-A
Dimensity 9000+[36]	MT6983	1x Cortex-X2; 3x Cortex-A710; 4x Cortex-A510	v9-A
Dimensity 9200[37]	MT6985	1x Cortex-X3; 3x Cortex-A715; 4x Cortex-A510	v9-A
Dimensity 9200+[38]	MT6985	1x Cortex-X3; 3x Cortex-A715; 4x Cortex-A510	v9-A
Dimensity 9300[39]	MT6989	1x Cortex-X4; 3x Cortex-X4; 4x Cortex-A720	v9.2-A
Dimensity 9300+[40]	MT6989	1x Cortex-X4; 3x Cortex-X4; 4x Cortex-A720	v9.2-A

[21] https://www.mediatek.com/products/smartphones-2/mediatek-dimensity-7025
[22] https://www.mediatek.com/products/smartphones-2/mediatek-dimensity-7030
[23] https://www.mediatek.com/products/smartphones-2/mediatek-dimensity-7050
[24] https://www.mediatek.com/products/smartphones-2/mediatek-dimensity-7200
[25] https://www.mediatek.com/blog/nothing-phone-2a-powered-by-mediatek-dimensity-7200-pro
[26] https://www.mediatek.com/products/smartphones-2/mediatek-dimensity-7300
[27] https://www.mediatek.com/products/smartphones-2/mediatek-dimensity-7350
[28] https://www.mediatek.com/products/smartphones-2/mediatek-dimensity-8000
[29] https://www.mediatek.com/products/smartphones-2/mediatek-dimensity-8020
[30] https://www.mediatek.com/products/smartphones-2/mediatek-dimensity-8050
[31] https://www.mediatek.com/products/smartphones-2/mediatek-dimensity-8100
[32] https://www.mediatek.com/products/smartphone-2/mediatek-dimensity-8200
[33] https://www.mediatek.com/products/smartphones-2/mediatek-dimensity-8250
[34] https://www.mediatek.com/products/smartphones-2/mediatek-dimensity-8300
[35] https://www.mediatek.com/products/smartphones-2/mediatek-dimensity-9000
[36] https://www.mediatek.com/products/smartphones-2/mediatek-dimensity-9000plus
[37] https://www.mediatek.com/products/smartphones-2/mediatek-dimensity-9200
[38] https://www.mediatek.com/products/smartphones-2/mediatek-dimensity-9200plus
[39] https://www.mediatek.com/products/smartphones-2/mediatek-dimensity-9300
[40] https://www.mediatek.com/products/smartphones-2/mediatek-dimensity-9300-plus

Accused Product	Model No.	Architecture	ARM ISA
Helio G70[41]	MT6769V	2x Cortex-A75; 6x Cortex-A55	v8.2-A
Helio G80[42]	MT6769T	2x Cortex-A75; 6x Cortex-A55	v8.2-A
Helio G85[43]	MT6769Z	2x Cortex-A75; 6x Cortex-A55	v8.2-A
Helio G88[44]	MT6769H	2x Cortex-A75; 6x Cortex-A55	v8.2-A
Helio G90/G90T[45]	MT6785V	2x Cortex-A76; 6x Cortex-A55	v8.2-A
Helio G95[46]	MT6785V	2x Cortex-A76; 6x Cortex-A55	v8.2-A
Helio G96[47]	MT6781	2x Cortex-A76; 6x Cortex-A55	v8.2-A
Helio G99[48]	MT6789	2x Cortex-A76; 6x Cortex-A55	v8.2-A
Helio G100[49]		2x Cortex-A76; 6x Cortex-A55	v8.2-A
Helio P65[50]	MT6768	2x Cortex-A75; 6x Cortex-A55	v8.2-A
Helio P90[51]	MT6779V	2x Cortex-A75; 6x Cortex-A55	v8.2-A
Helio P95[52]	MT6779V	2x Cortex-A75; 6x Cortex-A55	v8.2-A
Kompanio 520[53]	MT8186	2x Cortex-A76; 6x Cortex-A55	v8.2-A
Kompanio 528[54]	MT8186T	2x Cortex-A76; 6x Cortex-A55	v8.2-A
Kompanio 800/800T[55]	MT8771	2x Cortex-A76; 6x Cortex-A55	v8.2-A
Kompanio 820[56]	MT8192	2x Cortex-A76; 6x Cortex-A55	v8.2-A
Kompanio 828[57]		2x Cortex-A76; 6x Cortex-A55	v8.2-A
Kompanio 838[58]	MT8188	2x Cortex-A78; 6x Cortex-A55	v8.2-A
Kompanio 900T[59]	MT8791	2x Cortex-A78; 6x Cortex-A55	v8.2-A
Kompanio 1200[60]	MT8195	4x Cortex-A78; 4x Cortex-A55	v8.2-A
Kompanio 1300T[61]	MT8797	4x Cortex-A78; 4x Cortex-A55	v8.2-A

[41] https://www.mediatek.com/products/smartphones-2/mediatek-helio-g70
[42] https://www.mediatek.com/products/smartphones-2/mediatek-helio-g80
[43] https://www.mediatek.com/products/smartphones-2/mediatek-helio-g85
[44] https://www.mediatek.com/products/smartphones-2/mediatek-helio-g88
[45] https://www.mediatek.com/products/smartphones-2/mediatek-helio-g90-series
[46] https://www.mediatek.com/products/smartphones-2/mediatek-helio-g95
[47] https://www.mediatek.com/products/smartphones-2/mediatek-helio-g96
[48] https://www.mediatek.com/products/smartphones-2/mediatek-helio-g99
[49] https://www.mediatek.com/products/smartphones-2/mediatek-helio-g100
[50] https://www.mediatek.com/products/smartphones-2/mediatek-helio-p65
[51] https://www.mediatek.com/products/smartphones-2/mediatek-helio-p90
[52] https://www.mediatek.com/products/smartphones-2/mediatek-helio-p95
[53] https://www.mediatek.com/products/chromebooks/mediatek-kompanio-520
[54] https://www.mediatek.com/products/chromebooks/mediatek-kompanio-528
[55] https://www.mediatek.com/products/tablets/mediatek-kompanio-800t
[56] https://www.mediatek.com/products/chromebooks/mediatek-kompanio-820
[57] https://www.mediatek.com/products/chromebooks/mediatek-kompanio-828
[58] https://www.mediatek.com/products/chromebooks/mediatek-kompanio-838
[59] https://www.mediatek.com/products/tablets/mediatek-kompanio-900t
[60] https://www.mediatek.com/products/chromebooks/mediatek-kompanio-1200
[61] https://www.mediatek.com/products/tablets/mediatek-kompanio-1300t

Accused Product	Model No.	Architecture	ARM ISA
Kompanio 1380[62]	MT8195T	4x Cortex-A78; 4x Cortex-A55	v8.2-A
Pentonic 2000[63]	MT9902/ MT9982	4x Cortex-A76	v8.2-A
MT9685		4x Cortex-A55	v8.2-A
MT9638[64]		4x Cortex-A55	v8.2-A
MT9612[65]		4x Cortex-A55	v8.2-A
Genio 1200[66]	MT8395	4x Cortex-A78; 4x Cortex-A55	v8.2-A
Genio 700[67]	MT8390	2x Cortex-A78; 6x Cortex-A55	v8.2-A
Genio 510[68]	MT8370	2x Cortex-A78; 4x Cortex-A55	v8.2-A
MT8675[69]	MT8675	4x Cortex-A76; 4x Cortex-A55	v8.2-A
MT2713	MT2713		
MT2715[70]	MT2715	4x Cortex-A78; 4x Cortex-A55	v8.2-A
MT2718	MT2718		
MT8678	MT8678		
Cockpit C-X1[71]			
Cockpit C-Y1[72]			
Cockpit C-M1[73]			
Cockpit C-V1[74]			
T830[75]	MT6990	4x Cortex-A55	v8.2-A
T800[76]	MT6980	4x Cortex-A55	v8.2-A
T750[77]	MT6890	4x Cortex-A55	v8.2-A

Table 1

Patent Local Rule 3-1(c): "A chart identifying specifically where each element of each asserted claim is found within each Accused Instrumentality, including for each element that such party

[62] https://www.mediatek.com/products/chromebooks/mediatek-kompanio-1380
[63] https://www.mediatek.com/products/digital-tv/mediatek-pentonic-2000
[64] https://www.mediatek.com/products/digital-tv/mt9638
[65] https://www.mediatek.com/products/digital-tv/mt9612
[66] https://www.mediatek.com/iot/products/genio-1200
[67] https://www.mediatek.com/iot/products/genio-700
[68] https://www.mediatek.com/iot/products/genio-510
[69] https://i.mediatek.com/in/automotive-infotainment
[70] https://i.mediatek.com/in/automotive-infotainment
[71] https://www.mediatek.com/products/automotive/dimensity-auto-cockpit
[72] https://www.mediatek.com/products/automotive/dimensity-auto-cockpit
[73] https://www.mediatek.com/products/automotive/dimensity-auto-cockpit
[74] https://www.mediatek.com/products/automotive/dimensity-auto-cockpit
[75] https://www.mediatek.com/products/5g-broadband/mediatek-t830
[76] https://www.mediatek.com/products/5g-broadband/mediatek-t800
[77] https://www.mediatek.com/products/5g-broadband/mediatek-t750

contends is governed by 35 U.S.C. § 112 (¶ 6), the identity of the structure(s), act(s), or material(s) in the Accused Instrumentality that performs the claimed function"

Disclosure: See Exhibit A for the '316 Patent Accused Products.

Patent Local Rule 3-1(d): "Whether each element of each asserted claim is claimed to be literally present or present under the doctrine of equivalents in the Accused Instrumentality"

Disclosure: Plaintiff contends that each element of each asserted claim is "literally" infringed in the '316 Patent Accused Products pursuant to Federal Circuit precedent.

In the alternative, and in accordance with Federal Circuit and Supreme Court precedent, Plaintiff further contends that each of the '316 Patent Accused Products for Claims the '316 Asserted Claims comprise structures that are identical or equivalent to the structures disclosed in the '316 Patent.

The '316 Patent Accused Products for the '316 Asserted Claims comprise structures that perform the same function, the same way, to reach the same result, as the structures disclosed in the '316 Patent. Specifically, the structures disclosed in the '316 Patent Accused Products perform the same function, the same way, to reach the same result as the corresponding structures in the '316 Patent. For the same or similar reasons, any differences between such structures in the Accused Instrumentalities and such structures disclosed in the '316 Patent are insubstantial.

Patent Local Rule 3-1(e): "For any patent that claims priority to an earlier application, the priority date to which each asserted claim allegedly is entitled."

Disclosure: Plaintiff contends that the asserted claims are each entitled to a priority date of no later than September 6, 2011, the filing date of the earliest of the applications to which the '316 Patent claims priority.

Patent Local Rule 3-1(f): "If a party claiming patent infringement wishes to preserve the right to rely, for any purpose, on the assertion that its own apparatus, product, device, process, method, act, or other instrumentality practices the claimed invention, the party must identify, separately for each asserted claim, each such apparatus, product, device, process, method, act, or other instrumentality that incorporates or reflects that particular claim."

Disclosure: Not applicable.

Patent Local Rule 3-2(a): "Documents (e.g., contracts, purchase orders, invoices, advertisements, marketing materials, offer letters, beta site testing agreements, and third party or 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. A party's production of a document as required herein shall not constitute an admission that such document evidences or is prior art under 35 U.S.C. §102"

Disclosure: No such documents are in Plaintiff's possession, custody, or control.

Patent Local Rule 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. R. 3-1(e), whichever is earlier"

Disclosure: Plaintiff's investigation is ongoing. Plaintiff reserves the right to further amend or modify its disclosures herein—including to supplement its infringement contentions or these disclosures—based on additional information obtained through discovery or other means.

Patent Local Rule 3-2(c): "A copy of the file history for each patent in suit."

Disclosure: See DPRIME-MTEK0000001-DPRIME-MTEK0000398, produced herewith.

U.S. PATENT NO. 10,372,197

Patent Local Rule 3-1(a): "Each claim of each patent in suit that is allegedly infringed by each opposing party."

Disclosure: Defendant infringes Claims 1, 2, 3, 4, 5, 6, 7, 8, 11, 12, 13, 15, 16, 18, 19 and 20 (the "'197 Asserted Claims") of U.S. Patent No. 10,372,197 (the "'197 Patent").

Patent Local Rule 3-1(b): "Separately for each asserted claim, each accused apparatus, product, device, process, method, act, or other instrumentality ('Accused Instrumentality') of each opposing party of which the party is aware. This identification shall be as specific as possible. Each product, device, and apparatus must be identified by name or model number, if known. Each method or process must be identified by name, if known, or by any product, device, or apparatus which, when used, allegedly results in the practice of the claimed method or process."

Disclosure: For the '197 Asserted Claims, the '197 Patent Accused Products are SoCs or application processors based on or derived from ARMv8.2 architecture, as well as subsequent

revisions to the ARM architecture such as the ARMv9 architecture, such as the Dimensity 9300 SoCs, and all reasonably similar products. As explained in Plaintiff's Complaint, Defendant infringes Claim 1 of the '197 Patent directly (including through making, using, selling, offering to sell, and importing into the United States) the '197 Patent Accused Products and by inducing customers and consumers to directly infringe Claim 1 of the '197 Patent.

Plaintiff's investigation to date indicates that SoCs or application processors based on or derived from the ARMv8.2 architecture, as well as subsequent revisions to the ARM architecture such as the ARMv9 architecture, include the devices identified below. On information and belief, Defendant makes, uses, sells, offers to sell, and/or imports into the United States (and induces customers and consumers to make, use, sell, offer to sell, or import into the United States) further electronic devices containing SoCs or microprocessors based on or derived from ARMv8.2 architecture, as well as subsequent revisions to the ARM architecture such as the ARMv9 architecture, in addition to those chips identified in **Table 2** below.

Accused Product	Model No.	Architecture	ARM ISA
Dimensity 700	MT6833	2x Cortex-A76; 6x Cortex-A55	v8.2-A
Dimensity 800	MT6873	4x Cortex-A76; 4x Cortex-A55	v8.2-A
Dimensity 810	MT6833V	2x Cortex-A76; 6x Cortex-A55	v8.2-A
Dimensity 820	MT6875	4x Cortex-A76; 4x Cortex-A55	v8.2-A
Dimensity 900	MT6877	2x Cortex-A78; 6x Cortex-A55	v8.2-A
Dimensity 920	MT6877T	2x Cortex-A78; 6x Cortex-A55	v8.2-A
Dimensity 930	MT6855	2x Cortex-A78; 6x Cortex-A55	v8.2-A
Dimensity 1000	MT6889Z	4x Cortex-A77; 4x Cortex-A55	v8.2-A
Dimensity 1000C	MT6883Z	4x Cortex-A77; 4x Cortex-A55	v8.2-A
Dimensity 1050	MT6879	2x Cortex-A78; 6x Cortex-A55	v8.2-A
Dimensity 1080	MT6877V	2x Cortex-A78; 6x Cortex-A55	v8.2-A
Dimensity 1100	MT6891Z	4x Cortex-A78; 4x Cortex-A55	v8.2-A
Dimensity 1200	MT6893	1x Cortex-A78; 3x Cortex-A78; 4x Cortex-A55	v8.2-A
Dimensity 1300	MT6893Z	1x Cortex-A78; 3x Cortex-A78; 4x Cortex-A55	v8.2-A
Dimensity 6020	MT6833	2x Cortex-A76; 6x Cortex-A55	v8.2-A
Dimensity 6080	MT6833	2x Cortex-A76; 6x Cortex-A55	v8.2-A
Dimensity 6100+	MT6835	2x Cortex-A76; 6x Cortex-A55	v8.2-A
Dimensity 6300	MT6835T	2x Cortex-A76; 6x Cortex-A55	v8.2-A

Accused Product	Model No.	Architecture	ARM ISA
Dimensity 7020	MT6855	2x Cortex-A78; 6x Cortex-A55	v8.2-A
Dimensity 7025	MT6855	2x Cortex-A78; 6x Cortex-A55	v8.2-A
Dimensity 7030	MT8775	2x Cortex-A78; 6x Cortex-A55	v8.2-A
Dimensity 7050	MT6877	2x Cortex-A78; 6x Cortex-A55	v8.2-A
Dimensity 7200	MT6886	2x Cortex-A715; 6x Cortex-A510	v9-A
Dimensity 7200 Pro	MT6886	2x Cortex-A715; 6x Cortex-A510	v9-A
Dimensity 7300/7300X	MT6878	4x Cortex-A78; 4x Cortex-A55	v8.2-A
Dimensity 7350		2x Cortex-A715; 6x Cortex-A510	v9-A
Dimensity 7350 Pro		2x Cortex-A715; 6x Cortex-A510	v9-A
Dimensity 8000	MT6895	4x Cortex-A78; 4x Cortex-A55	v8.2-A
Dimensity 8020	MT6891	4x Cortex-A78; 4x Cortex-A55	v8.2-A
Dimensity 8050	MT6893	1x Cortex-A78; 3x Cortex-A78; 4x Cortex-A55	v8.2-A
Dimensity 8100	MT6895Z	4x Cortex-A78; 4x Cortex-A55	v8.2-A
Dimensity 8200	MT6896Z	1x Cortex-A78; 3x Cortex-A78; 4x Cortex-A55	v8.2-A
Dimensity 8200-Ultra		1x Cortex-A78; 3x Cortex-A78; 4x Cortex-A55	v8.2-A
Dimensity 8250		1x Cortex-A78; 3x Cortex-A78; 4x Cortex-A55	v8.2-A
Dimensity 8300	MT6897	1x Cortex-A715; 3x Cortex-A715; 4x Cortex-A510	v9-A
Dimensity 9000	MT6983	1x Cortex-X2; 3x Cortex-A710; 4x Cortex-A510	v9-A
Dimensity 9000+	MT6983	1x Cortex-X2; 3x Cortex-A710; 4x Cortex-A510	v9-A
Dimensity 9200	MT6985	1x Cortex-X3; 3x Cortex-A715; 4x Cortex-A510	v9-A
Dimensity 9200+	MT6985	1x Cortex-X3; 3x Cortex-A715; 4x Cortex-A510	v9-A
Dimensity 9300	MT6989	1x Cortex-X4; 3x Cortex-X4; 4x Cortex-A720	v9.2-A
Dimensity 9300+	MT6989	1x Cortex-X4; 3x Cortex-X4; 4x Cortex-A720	v9.2-A
Dimensity 9400	MT6991	1x Cortex-X5; 3x Cortex-X4; 4x Cortex-A720	v9.2-A
Helio G70	MT6769V	2x Cortex-A75; 6x Cortex-A55	v8.2-A
Helio G80	MT6769T	2x Cortex-A75; 6x Cortex-A55	v8.2-A
Helio G85	MT6769Z	2x Cortex-A75; 6x Cortex-A55	v8.2-A
Helio G88	MT6769H	2x Cortex-A75; 6x Cortex-A55	v8.2-A
Helio G90/G90T	MT6785V	2x Cortex-A76; 6x Cortex-A55	v8.2-A
Helio G95	MT6785V	2x Cortex-A76; 6x Cortex-A55	v8.2-A
Helio G96	MT6781	2x Cortex-A76; 6x Cortex-A55	v8.2-A
Helio G99	MT6789	2x Cortex-A76; 6x Cortex-A55	v8.2-A
Helio G100		2x Cortex-A76; 6x Cortex-A55	v8.2-A
Helio P65	MT6768	2x Cortex-A75; 6x Cortex-A55	v8.2-A
Helio P90	MT6779V	2x Cortex-A75; 6x Cortex-A55	v8.2-A
Helio P95	MT6779V	2x Cortex-A75; 6x Cortex-A55	v8.2-A
Kompanio 520	MT8186	2x Cortex-A76; 6x Cortex-A55	v8.2-A
Kompanio 528	MT8186T	2x Cortex-A76; 6x Cortex-A55	v8.2-A
Kompanio 800/800T	MT8771	2x Cortex-A76; 6x Cortex-A55	v8.2-A
Kompanio 820	MT8192	2x Cortex-A76; 6x Cortex-A55	v8.2-A
Kompanio 828		2x Cortex-A76; 6x Cortex-A55	v8.2-A

Accused Product	Model No.	Architecture	ARM ISA
Kompanio 838	MT8188	2x Cortex-A78; 6x Cortex-A55	v8.2-A
Kompanio 900T	MT8791	2x Cortex-A78; 6x Cortex-A55	v8.2-A
Kompanio 1200	MT8195	4x Cortex-A78; 4x Cortex-A55	v8.2-A
Kompanio 1300T	MT8797	4x Cortex-A78; 4x Cortex-A55	v8.2-A
Kompanio 1380	MT8195T	4x Cortex-A78; 4x Cortex-A55	v8.2-A
Pentonic 2000	MT9902/ MT9982	4x Cortex-A76	v8.2-A
MT9685		4x Cortex-A55	v8.2-A
MT9638		4x Cortex-A55	v8.2-A
MT9612		4x Cortex-A55	v8.2-A
Genio 1200	MT8395	4x Cortex-A78; 4x Cortex-A55	v8.2-A
Genio 700	MT8390	2x Cortex-A78; 6x Cortex-A55	v8.2-A
Genio 510	MT8370	2x Cortex-A78; 4x Cortex-A55	v8.2-A
MT8675	MT8675	4x Cortex-A76; 4x Cortex-A55	v8.2-A
MT2713	MT2713		
MT2715	MT2715	4x Cortex-A78; 4x Cortex-A55	v8.2-A
MT2718	MT2718		
MT8678	MT8678		
Cockpit C-X1			
Cockpit C-Y1			
Cockpit C-M1			
Cockpit C-V1			
T830	MT6990	4x Cortex-A55	v8.2-A
T800	MT6980	4x Cortex-A55	v8.2-A
T750	MT6890	4x Cortex-A55	v8.2-A

Table 2

Patent Local Rule 3-1(c): "A chart identifying specifically where each element of each asserted claim is found within each Accused Instrumentality, including for each element that such party contends is governed by 35 U.S.C. § 112 (¶ 6), the identity of the structure(s), act(s), or material(s) in the Accused Instrumentality that performs the claimed function"

Disclosure: See Exhibit B for the '197 Patent Accused Products.

Patent Local Rule 3-1(d): "Whether each element of each asserted claim is claimed to be literally present or present under the doctrine of equivalents in the Accused Instrumentality"

Disclosure: Plaintiff contends that each element of each asserted claim is "literally" infringed in the '197 Patent Accused Products pursuant to Federal Circuit precedent.

In the alternative, and in accordance with Federal Circuit and Supreme Court precedent, Plaintiff further contends that each of the '197 Patent Accused Products for Claims the '197 Asserted Claims comprise structures that are identical or equivalent to the structures disclosed in the '197 Patent.

The '197 Patent Accused Products for the '197 Asserted Claims comprise structures that perform the same function, the same way, to reach the same result, as the structures disclosed in the '197 Patent. Specifically, the structures disclosed in the '197 Patent Accused Products perform the same function, the same way, to reach the same result as the corresponding structures in the '197 Patent. For the same or similar reasons, any differences between such structures in the Accused Instrumentalities and such structures disclosed in the '197 Patent are insubstantial.

Patent Local Rule 3-1(e): "For any patent that claims priority to an earlier application, the priority date to which each asserted claim allegedly is entitled."

Disclosure: Plaintiff contends that the asserted claims are each entitled to a priority date of no later than December 15, 2011, the filing date of the earliest of the applications to which the '197 Patent claims priority.

Patent Local Rule 3-1(f): "If a party claiming patent infringement wishes to preserve the right to rely, for any purpose, on the assertion that its own apparatus, product, device, process, method, act, or other instrumentality practices the claimed invention, the party must identify, separately for each asserted claim, each such apparatus, product, device, process, method, act, or other instrumentality that incorporates or reflects that particular claim."

Disclosure: Not applicable.

Patent Local Rule 3-2(a): "Documents (e.g., contracts, purchase orders, invoices, advertisements, marketing materials, offer letters, beta site testing agreements, and third party or 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. A party's production of a document as required herein shall not constitute an admission that such document evidences or is prior art under 35 U.S.C. §102"

Disclosure: No such documents are in Plaintiff's possession, custody, or control.

Patent Local Rule 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. R. 3-1(e), whichever is earlier"

Disclosure: See invention disclosure statement INTEL000132-INTEL000147 produced herewith. Any redaction in this document was made by third-party Intel Corp., not Plaintiff.

Patent Local Rule 3-2(c): "A copy of the file history for each patent in suit."

Disclosure: See DPRIME-MTEK0000399-DPRIME-MTEK0000768, produced herewith.

U.S. PATENT NO. 10,740,281

Patent Local Rule 3-1(a): "Each claim of each patent in suit that is allegedly infringed by each opposing party."

Disclosure: Defendant infringes Claims 1, 2, 3, 4, 6, 7, 8, 9, 10, 11, 12, 13 and 14 (the "'281 Asserted Claims") of U.S. Patent No. 10,740,281 (the "'281 Patent").

Patent Local Rule 3-1(b): "Separately for each asserted claim, each accused apparatus, product, device, process, method, act, or other instrumentality ('Accused Instrumentality') of each opposing party of which the party is aware. This identification shall be as specific as possible. Each product, device, and apparatus must be identified by name or model number, if known. Each method or process must be identified by name, if known, or by any product, device, or apparatus which, when used, allegedly results in the practice of the claimed method or process."

Disclosure: Claim 1-4 and 7-14: For Claims 1-4 and 7-14, the '281 Patent Accused Products are SoCs or application processors ("APs") based on or derived from ARMv8.2 architecture, as well as subsequent revisions to the ARM architecture such as the ARMv9 architecture, such as the Dimensity 9000 SoCs, and all reasonably similar products. As explained in Plaintiff's Complaint, Defendant infringes Claim 8 of the '281 Patent directly (including through making, using, selling, offering to sell, and importing into the United States the '218 Patent Accused Products) and by inducing consumers to use the '281 Patent Accused Products within the United States in the ordinary, customary, and intended way by, directly or through intermediaries,

supplying the ’281 Patent Accused Products to consumers within the United States and instructing and encouraging such customers to use the ’281 Patent Accused Products in the ordinary, customary, and intended way.

Plaintiff’s investigation to date indicates that SoCs or application processors based on or derived from ARMv8.2 architecture, as well as subsequent revisions to the ARM architecture such as the ARMv9 architecture include the devices identified below. On information and belief, Defendant makes, uses, sells, offers to sell, and/or imports into the United States (and induces customers and consumers to make, use, sell, offer to sell, or import into the United States) further electronic devices containing SoCs or microprocessors based on or derived from ARMv8.2 architecture, as well as subsequent revisions to the ARM architecture such as the ARMv9 architecture, in addition to those chips identified in **Table 3.1** below.

Accused Product	Model No.	Architecture	ARM ISA
Dimensity 700	MT6833	2x Cortex-A76; 6x Cortex-A55	v8.2-A
Dimensity 800	MT6873	4x Cortex-A76; 4x Cortex-A55	v8.2-A
Dimensity 810	MT6833V	2x Cortex-A76; 6x Cortex-A55	v8.2-A
Dimensity 820	MT6875	4x Cortex-A76; 4x Cortex-A55	v8.2-A
Dimensity 900	MT6877	2x Cortex-A78; 6x Cortex-A55	v8.2-A
Dimensity 920	MT6877T	2x Cortex-A78; 6x Cortex-A55	v8.2-A
Dimensity 930	MT6855	2x Cortex-A78; 6x Cortex-A55	v8.2-A
Dimensity 1000	MT6889Z	4x Cortex-A77; 4x Cortex-A55	v8.2-A
Dimensity 1000C	MT6883Z	4x Cortex-A77; 4x Cortex-A55	v8.2-A
Dimensity 1050	MT6879	2x Cortex-A78; 6x Cortex-A55	v8.2-A
Dimensity 1080	MT6877V	2x Cortex-A78; 6x Cortex-A55	v8.2-A
Dimensity 1100	MT6891Z	4x Cortex-A78; 4x Cortex-A55	v8.2-A
Dimensity 1200	MT6893	1x Cortex-A78; 3x Cortex-A78; 4x Cortex-A55	v8.2-A
Dimensity 1300	MT6893Z	1x Cortex-A78; 3x Cortex-A78; 4x Cortex-A55	v8.2-A
Dimensity 6020	MT6833	2x Cortex-A76; 6x Cortex-A55	v8.2-A
Dimensity 6080	MT6833	2x Cortex-A76; 6x Cortex-A55	v8.2-A
Dimensity 6100+	MT6835	2x Cortex-A76; 6x Cortex-A55	v8.2-A
Dimensity 6300	MT6835T	2x Cortex-A76; 6x Cortex-A55	v8.2-A
Dimensity 7020	MT6855	2x Cortex-A78; 6x Cortex-A55	v8.2-A
Dimensity 7025	MT6855	2x Cortex-A78; 6x Cortex-A55	v8.2-A
Dimensity 7030	MT8775	2x Cortex-A78; 6x Cortex-A55	v8.2-A

Accused Product	Model No.	Architecture	ARM ISA
Dimensity 7050	MT6877	2x Cortex-A78; 6x Cortex-A55	v8.2-A
Dimensity 7200	MT6886	2x Cortex-A715; 6x Cortex-A510	v9-A
Dimensity 7200 Pro	MT6886	2x Cortex-A715; 6x Cortex-A510	v9-A
Dimensity 7300/7300X	MT6878	4x Cortex-A78; 4x Cortex-A55	v8.2-A
Dimensity 7350		2x Cortex-A715; 6x Cortex-A510	v9-A
Dimensity 7350 Pro		2x Cortex-A715; 6x Cortex-A510	v9-A
Dimensity 8000	MT6895	4x Cortex-A78; 4x Cortex-A55	v8.2-A
Dimensity 8020	MT6891	4x Cortex-A78; 4x Cortex-A55	v8.2-A
Dimensity 8050	MT6893	1x Cortex-A78; 3x Cortex-A78; 4x Cortex-A55	v8.2-A
Dimensity 8100	MT6895Z	4x Cortex-A78; 4x Cortex-A55	v8.2-A
Dimensity 8200	MT6896Z	1x Cortex-A78; 3x Cortex-A78; 4x Cortex-A55	v8.2-A
Dimensity 8200-Ultra		1x Cortex-A78; 3x Cortex-A78; 4x Cortex-A55	v8.2-A
Dimensity 8250		1x Cortex-A78; 3x Cortex-A78; 4x Cortex-A55	v8.2-A
Dimensity 8300	MT6897	1x Cortex-A715; 3x Cortex-A715; 4x Cortex-A510	v9-A
Dimensity 9000	MT6983	1x Cortex-X2; 3x Cortex-A710; 4x Cortex-A510	v9-A
Dimensity 9000+	MT6983	1x Cortex-X2; 3x Cortex-A710; 4x Cortex-A510	v9-A
Dimensity 9200	MT6985	1x Cortex-X3; 3x Cortex-A715; 4x Cortex-A510	v9-A
Dimensity 9200+	MT6985	1x Cortex-X3; 3x Cortex-A715; 4x Cortex-A510	v9-A
Dimensity 9300	MT6989	1x Cortex-X4; 3x Cortex-X4; 4x Cortex-A720	v9.2-A
Dimensity 9300+	MT6989	1x Cortex-X4; 3x Cortex-X4; 4x Cortex-A720	v9.2-A
Dimensity 9400	MT6991	1x Cortex-X5; 3x Cortex-X4; 4x Cortex-A720	v9.2-A
Helio G70	MT6769V	2x Cortex-A75; 6x Cortex-A55	v8.2-A
Helio G80	MT6769T	2x Cortex-A75; 6x Cortex-A55	v8.2-A
Helio G85	MT6769Z	2x Cortex-A75; 6x Cortex-A55	v8.2-A
Helio G88	MT6769H	2x Cortex-A75; 6x Cortex-A55	v8.2-A
Helio G90/G90T	MT6785V	2x Cortex-A76; 6x Cortex-A55	v8.2-A
Helio G95	MT6785V	2x Cortex-A76; 6x Cortex-A55	v8.2-A
Helio G96	MT6781	2x Cortex-A76; 6x Cortex-A55	v8.2-A
Helio G99	MT6789	2x Cortex-A76; 6x Cortex-A55	v8.2-A
Helio G100		2x Cortex-A76; 6x Cortex-A55	v8.2-A
Helio P65	MT6768	2x Cortex-A75; 6x Cortex-A55	v8.2-A
Helio P90	MT6779V	2x Cortex-A75; 6x Cortex-A55	v8.2-A
Helio P95	MT6779V	2x Cortex-A75; 6x Cortex-A55	v8.2-A
Kompanio 520	MT8186	2x Cortex-A76; 6x Cortex-A55	v8.2-A
Kompanio 528	MT8186T	2x Cortex-A76; 6x Cortex-A55	v8.2-A
Kompanio 800/800T	MT8771	2x Cortex-A76; 6x Cortex-A55	v8.2-A
Kompanio 820	MT8192	2x Cortex-A76; 6x Cortex-A55	v8.2-A
Kompanio 828		2x Cortex-A76; 6x Cortex-A55	v8.2-A
Kompanio 838	MT8188	2x Cortex-A78; 6x Cortex-A55	v8.2-A
Kompanio 900T	MT8791	2x Cortex-A78; 6x Cortex-A55	v8.2-A
Kompanio 1200	MT8195	4x Cortex-A78; 4x Cortex-A55	v8.2-A

Accused Product	Model No.	Architecture	ARM ISA
Kompanio 1300T	MT8797	4x Cortex-A78; 4x Cortex-A55	v8.2-A
Kompanio 1380	MT8195T	4x Cortex-A78; 4x Cortex-A55	v8.2-A
Pentonic 2000	MT9902/ MT9982	4x Cortex-A76	v8.2-A
MT9685		4x Cortex-A55	v8.2-A
MT9638		4x Cortex-A55	v8.2-A
MT9612		4x Cortex-A55	v8.2-A
Genio 1200	MT8395	4x Cortex-A78; 4x Cortex-A55	v8.2-A
Genio 700	MT8390	2x Cortex-A78; 6x Cortex-A55	v8.2-A
Genio 510	MT8370	2x Cortex-A78; 4x Cortex-A55	v8.2-A
MT8675	MT8675	4x Cortex-A76; 4x Cortex-A55	v8.2-A
MT2713	MT2713		
MT2715	MT2715	4x Cortex-A78; 4x Cortex-A55	v8.2-A
MT2718	MT2718		
MT8678	MT8678		
Cockpit C-X1			
Cockpit C-Y1			
Cockpit C-M1			
Cockpit C-V1			
T830	MT6990	4x Cortex-A55	v8.2-A
T800	MT6980	4x Cortex-A55	v8.2-A
T750	MT6890	4x Cortex-A55	v8.2-A

Table 3.1

Claim 6: For Claim 6, the ’281 Patent Accused Products are SoCs or application processors (“APs”) based on or derived from ARMv8.2 architecture, as well as subsequent revisions to the ARM architecture such as the ARMv9 architecture, that contain at least three cores, such as the Dimensity 9000 SoCs, and all reasonably similar products. As explained in Plaintiff’s Complaint, Defendant infringes Claim 8 of the ’281 Patent directly (including through making, using, selling, offering to sell, and importing into the United States the ’218 Patent Accused Products) and by inducing consumers to use the ’281 Patent Accused Products within the United States in the ordinary, customary, and intended way by, directly or through intermediaries, supplying the ’281 Patent Accused Products to consumers within the United States and instructing

and encouraging such customers to use the ’281 Patent Accused Products in the ordinary, customary, and intended way.

Plaintiff’s investigation to date indicates that SoCs or application processors based on or derived from ARMv8.2 architecture, as well as subsequent revisions to the ARM architecture such as the ARMv9 architecture include the devices identified below. On information and belief, Defendant makes, uses, sells, offers to sell, and/or imports into the United States (and induces customers and consumers to make, use, sell, offer to sell, or import into the United States) further electronic devices containing SoCs or microprocessors based on or derived from ARMv8.2 architecture, as well as subsequent revisions to the ARM architecture such as the ARMv9 architecture, in addition to those chips identified in **Table 3.2** below.

Accused Product	Model No.	Architecture	ARM ISA
Dimensity 800	MT6873	4x Cortex-A76; 4x Cortex-A55	v8.2-A
Dimensity 820	MT6875	4x Cortex-A76; 4x Cortex-A55	v8.2-A
Dimensity 1000	MT6889Z	4x Cortex-A77; 4x Cortex-A55	v8.2-A
Dimensity 1000C	MT6883Z	4x Cortex-A77; 4x Cortex-A55	v8.2-A
Dimensity 1100	MT6891Z	4x Cortex-A78; 4x Cortex-A55	v8.2-A
Dimensity 1200	MT6893	1x Cortex-A78; 3x Cortex-A78; 4x Cortex-A55	v8.2-A
Dimensity 1300	MT6893Z	1x Cortex-A78; 3x Cortex-A78; 4x Cortex-A55	v8.2-A
Dimensity 7300/7300X	MT6878	4x Cortex-A78; 4x Cortex-A55	v8.2-A
Dimensity 8000	MT6895	4x Cortex-A78; 4x Cortex-A55	v8.2-A
Dimensity 8020	MT6891	4x Cortex-A78; 4x Cortex-A55	v8.2-A
Dimensity 8050	MT6893	1x Cortex-A78; 3x Cortex-A78; 4x Cortex-A55	v8.2-A
Dimensity 8100	MT6895Z	4x Cortex-A78; 4x Cortex-A55	v8.2-A
Dimensity 8200	MT6896Z	1x Cortex-A78; 3x Cortex-A78; 4x Cortex-A55	v8.2-A
Dimensity 8200-Ultra		1x Cortex-A78; 3x Cortex-A78; 4x Cortex-A55	v8.2-A
Dimensity 8250		1x Cortex-A78; 3x Cortex-A78; 4x Cortex-A55	v8.2-A
Dimensity 8300	MT6897	1x Cortex-A715; 3x Cortex-A715; 4x Cortex-A510	v9-A
Dimensity 9000	MT6983	1x Cortex-X2; 3x Cortex-A710; 4x Cortex-A510	v9-A
Dimensity 9000+	MT6983	1x Cortex-X2; 3x Cortex-A710; 4x Cortex-A510	v9-A
Dimensity 9200	MT6985	1x Cortex-X3; 3x Cortex-A715; 4x Cortex-A510	v9-A
Dimensity 9200+	MT6985	1x Cortex-X3; 3x Cortex-A715; 4x Cortex-A510	v9-A
Dimensity 9300	MT6989	1x Cortex-X4; 3x Cortex-X4; 4x Cortex-A720	v9.2-A
Dimensity 9300+	MT6989	1x Cortex-X4; 3x Cortex-X4; 4x Cortex-A720	v9.2-A
Dimensity 9400	MT6991	1x Cortex-X5; 3x Cortex-X4; 4x Cortex-A720	v9.2-A

Accused Product	Model No.	Architecture	ARM ISA
Kompanio 1200	MT8195	4x Cortex-A78; 4x Cortex-A55	v8.2-A
Kompanio 1300T	MT8797	4x Cortex-A78; 4x Cortex-A55	v8.2-A
Kompanio 1380	MT8195T	4x Cortex-A78; 4x Cortex-A55	v8.2-A
Pentonic 2000	MT9902/ MT9982	4x Cortex-A76	v8.2-A
Genio 1200	MT8395	4x Cortex-A78; 4x Cortex-A55	v8.2-A
MT8675	MT8675	4x Cortex-A76; 4x Cortex-A55	v8.2-A
MT2713	MT2713		
MT2715	MT2715	4x Cortex-A78; 4x Cortex-A55	v8.2-A
MT2718	MT2718		
MT8678	MT8678		
Cockpit C-X1			
Cockpit C-Y1			
Cockpit C-M1			
Cockpit C-V1			

Table 3.2

Patent Local Rule 3-1(c): "A chart identifying specifically where each element of each asserted claim is found within each Accused Instrumentality, including for each element that such party contends is governed by 35 U.S.C. § 112 (¶ 6), the identity of the structure(s), act(s), or material(s) in the Accused Instrumentality that performs the claimed function"

Disclosure: See Exhibit C for the '281 Patent Accused Products.

Patent Local Rule 3-1(d): "Whether each element of each asserted claim is claimed to be literally present or present under the doctrine of equivalents in the Accused Instrumentality"

Disclosure: Plaintiff contends that each element of each asserted claim is "literally" infringed in the '218 Patent Accused Products pursuant to Federal Circuit precedent.

In the alternative, and in accordance with Federal Circuit and Supreme Court precedent, Plaintiff further contends that each of the '218 Patent Accused Products for Claims the '281 Asserted Claims comprise structures that are identical or equivalent to the structures disclosed in the '281 Patent.

The '281 Patent Accused Products for the '281 Asserted Claims comprise structures that perform the same function, the same way, to reach the same result, as the structures disclosed in

the ’281 Patent. Specifically, the structures disclosed in the ’281 Patent Accused Products perform the same function, the same way, to reach the same result as the corresponding structures in the ’281 Patent. For the same or similar reasons, any differences between such structures in the Accused Instrumentalities and such structures disclosed in the ’281 Patent are insubstantial.

Patent Local Rule 3-1(e): “For any patent that claims priority to an earlier application, the priority date to which each asserted claim allegedly is entitled.”

Disclosure: Plaintiff contends that the asserted claims are each entitled to a priority date of no later than December 22, 2011, the filing date of the earliest of the applications to which the ’281 Patent claims priority.

Patent Local Rule 3-1(f): “If a party claiming patent infringement wishes to preserve the right to rely, for any purpose, on the assertion that its own apparatus, product, device, process, method, act, or other instrumentality practices the claimed invention, the party must identify, separately for each asserted claim, each such apparatus, product, device, process, method, act, or other instrumentality that incorporates or reflects that particular claim.”

Disclosure: Not applicable.

Patent Local Rule 3-2(a): “Documents (e.g., contracts, purchase orders, invoices, advertisements, marketing materials, offer letters, beta site testing agreements, and third party or 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. A party’s production of a document as required herein shall not constitute an admission that such document evidences or is prior art under 35 U.S.C. §102”

Disclosure: No such documents are in Plaintiff’s possession, custody, or control.

Patent Local Rule 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. R. 3-1(e), whichever is earlier”

Disclosure: Plaintiff’s investigation is ongoing. Plaintiff reserves the right to further amend or modify its disclosures herein—including to supplement its infringement contentions or these disclosures—based on additional information obtained through discovery or other means.

Patent Local Rule 3-2(c): “A copy of the file history for each patent in suit.”

Disclosure: See DPRIME-MTEK0002661-DPRIME-MTEK0002867, produced herewith.

U.S. PATENT NO. 8,984,228

Patent Local Rule 3-1(a): "Each claim of each patent in suit that is allegedly infringed by each opposing party."

Disclosure: Defendant infringes Claims 1, 2, 4, 5, 6, 7, 11, 12, 13 and 14 (the "'228 Asserted Claims") of U.S. Patent No. 8,984,228 (the "'228 Patent").

Patent Local Rule 3-1(b): "Separately for each asserted claim, each accused apparatus, product, device, process, method, act, or other instrumentality ('Accused Instrumentality') of each opposing party of which the party is aware. This identification shall be as specific as possible. Each product, device, and apparatus must be identified by name or model number, if known. Each method or process must be identified by name, if known, or by any product, device, or apparatus which, when used, allegedly results in the practice of the claimed method or process."

Disclosure: For the '228 Asserted Claims, the '228 Patent Accused Products are SoCs or application processors ("APs") based on or derived from ARMv8.2 architecture, as well as subsequent revisions to the ARM architecture such as the ARMv9 architecture, such as the Dimensity 9000 SoCs, and all reasonably similar products. As explained in Plaintiff's Complaint, Defendant infringes Claim 1 of the '228 Patent directly (including through making, using, selling, offering to sell, and importing into the United States the '228 Patent Accused Products) and by inducing consumers to use the '228 Patent Accused Products within the United States in the ordinary, customary, and intended way by, directly or through intermediaries, supplying the '228 Patent Accused Products to consumers within the United States and instructing and encouraging such customers to use the '228 Patent Accused Products in the ordinary, customary, and intended way.

Plaintiff's investigation to date indicates that SoCs or application processors based on or derived from ARMv8.2 architecture, as well as subsequent revisions to the ARM architecture such

as the ARMv9 architecture include the devices identified below. On information and belief, Defendant makes, uses, sells, offers to sell, and/or imports into the United States (and induces customers and consumers to make, use, sell, offer to sell, or import into the United States) further electronic devices containing SoCs or microprocessors based on or derived from ARMv8.2 architecture, as well as subsequent revisions to the ARM architecture such as the ARMv9 architecture, in addition to those chips identified in **Table 4** below.

Accused Product	Model No.	Architecture	ARM ISA
Dimensity 700	MT6833	2x Cortex-A76; 6x Cortex-A55	v8.2-A
Dimensity 800	MT6873	4x Cortex-A76; 4x Cortex-A55	v8.2-A
Dimensity 810	MT6833V	2x Cortex-A76; 6x Cortex-A55	v8.2-A
Dimensity 820	MT6875	4x Cortex-A76; 4x Cortex-A55	v8.2-A
Dimensity 900	MT6877	2x Cortex-A78; 6x Cortex-A55	v8.2-A
Dimensity 920	MT6877T	2x Cortex-A78; 6x Cortex-A55	v8.2-A
Dimensity 930	MT6855	2x Cortex-A78; 6x Cortex-A55	v8.2-A
Dimensity 1000	MT6889Z	4x Cortex-A77; 4x Cortex-A55	v8.2-A
Dimensity 1000C	MT6883Z	4x Cortex-A77; 4x Cortex-A55	v8.2-A
Dimensity 1050	MT6879	2x Cortex-A78; 6x Cortex-A55	v8.2-A
Dimensity 1080	MT6877V	2x Cortex-A78; 6x Cortex-A55	v8.2-A
Dimensity 1100	MT6891Z	4x Cortex-A78; 4x Cortex-A55	v8.2-A
Dimensity 1200	MT6893	1x Cortex-A78; 3x Cortex-A78; 4x Cortex-A55	v8.2-A
Dimensity 1300	MT6893Z	1x Cortex-A78; 3x Cortex-A78; 4x Cortex-A55	v8.2-A
Dimensity 6020	MT6833	2x Cortex-A76; 6x Cortex-A55	v8.2-A
Dimensity 6080	MT6833	2x Cortex-A76; 6x Cortex-A55	v8.2-A
Dimensity 6100+	MT6835	2x Cortex-A76; 6x Cortex-A55	v8.2-A
Dimensity 6300	MT6835T	2x Cortex-A76; 6x Cortex-A55	v8.2-A
Dimensity 7020	MT6855	2x Cortex-A78; 6x Cortex-A55	v8.2-A
Dimensity 7025	MT6855	2x Cortex-A78; 6x Cortex-A55	v8.2-A
Dimensity 7030	MT8775	2x Cortex-A78; 6x Cortex-A55	v8.2-A
Dimensity 7050	MT6877	2x Cortex-A78; 6x Cortex-A55	v8.2-A
Dimensity 7200	MT6886	2x Cortex-A715; 6x Cortex-A510	v9-A
Dimensity 7200 Pro	MT6886	2x Cortex-A715; 6x Cortex-A510	v9-A
Dimensity 7300/7300X	MT6878	4x Cortex-A78; 4x Cortex-A55	v8.2-A
Dimensity 7350		2x Cortex-A715; 6x Cortex-A510	v9-A
Dimensity 7350 Pro		2x Cortex-A715; 6x Cortex-A510	v9-A
Dimensity 8000	MT6895	4x Cortex-A78; 4x Cortex-A55	v8.2-A
Dimensity 8020	MT6891	4x Cortex-A78; 4x Cortex-A55	v8.2-A
Dimensity 8050	MT6893	1x Cortex-A78; 3x Cortex-A78; 4x Cortex-A55	v8.2-A

Accused Product	Model No.	Architecture	ARM ISA
Dimensity 8100	MT6895Z	4x Cortex-A78; 4x Cortex-A55	v8.2-A
Dimensity 8200	MT6896Z	1x Cortex-A78; 3x Cortex-A78; 4x Cortex-A55	v8.2-A
Dimensity 8200-Ultra		1x Cortex-A78; 3x Cortex-A78; 4x Cortex-A55	v8.2-A
Dimensity 8250		1x Cortex-A78; 3x Cortex-A78; 4x Cortex-A55	v8.2-A
Dimensity 8300	MT6897	1x Cortex-A715; 3x Cortex-A715; 4x Cortex-A510	v9-A
Dimensity 9000	MT6983	1x Cortex-X2; 3x Cortex-A710; 4x Cortex-A510	v9-A
Dimensity 9000+	MT6983	1x Cortex-X2; 3x Cortex-A710; 4x Cortex-A510	v9-A
Dimensity 9200	MT6985	1x Cortex-X3; 3x Cortex-A715; 4x Cortex-A510	v9-A
Dimensity 9200+	MT6985	1x Cortex-X3; 3x Cortex-A715; 4x Cortex-A510	v9-A
Dimensity 9300	MT6989	1x Cortex-X4; 3x Cortex-X4; 4x Cortex-A720	v9.2-A
Dimensity 9300+	MT6989	1x Cortex-X4; 3x Cortex-X4; 4x Cortex-A720	v9.2-A
Dimensity 9400	MT6991	1x Cortex-X5; 3x Cortex-X4; 4x Cortex-A720	v9.2-A
Helio G70	MT6769V	2x Cortex-A75; 6x Cortex-A55	v8.2-A
Helio G80	MT6769T	2x Cortex-A75; 6x Cortex-A55	v8.2-A
Helio G85	MT6769Z	2x Cortex-A75; 6x Cortex-A55	v8.2-A
Helio G88	MT6769H	2x Cortex-A75; 6x Cortex-A55	v8.2-A
Helio G90/G90T	MT6785V	2x Cortex-A76; 6x Cortex-A55	v8.2-A
Helio G95	MT6785V	2x Cortex-A76; 6x Cortex-A55	v8.2-A
Helio G96	MT6781	2x Cortex-A76; 6x Cortex-A55	v8.2-A
Helio G99	MT6789	2x Cortex-A76; 6x Cortex-A55	v8.2-A
Helio G100		2x Cortex-A76; 6x Cortex-A55	v8.2-A
Helio P65	MT6768	2x Cortex-A75; 6x Cortex-A55	v8.2-A
Helio P90	MT6779V	2x Cortex-A75; 6x Cortex-A55	v8.2-A
Helio P95	MT6779V	2x Cortex-A75; 6x Cortex-A55	v8.2-A
Kompanio 520	MT8186	2x Cortex-A76; 6x Cortex-A55	v8.2-A
Kompanio 528	MT8186T	2x Cortex-A76; 6x Cortex-A55	v8.2-A
Kompanio 800/800T	MT8771	2x Cortex-A76; 6x Cortex-A55	v8.2-A
Kompanio 820	MT8192	2x Cortex-A76; 6x Cortex-A55	v8.2-A
Kompanio 828		2x Cortex-A76; 6x Cortex-A55	v8.2-A
Kompanio 838	MT8188	2x Cortex-A78; 6x Cortex-A55	v8.2-A
Kompanio 900T	MT8791	2x Cortex-A78; 6x Cortex-A55	v8.2-A
Kompanio 1200	MT8195	4x Cortex-A78; 4x Cortex-A55	v8.2-A
Kompanio 1300T	MT8797	4x Cortex-A78; 4x Cortex-A55	v8.2-A
Kompanio 1380	MT8195T	4x Cortex-A78; 4x Cortex-A55	v8.2-A
Pentonic 2000	MT9902/ MT9982	4x Cortex-A76	v8.2-A
MT9685		4x Cortex-A55	v8.2-A
MT9638		4x Cortex-A55	v8.2-A
MT9612		4x Cortex-A55	v8.2-A
Genio 1200	MT8395	4x Cortex-A78; 4x Cortex-A55	v8.2-A
Genio 700	MT8390	2x Cortex-A78; 6x Cortex-A55	v8.2-A

Accused Product	Model No.	Architecture	ARM ISA
Genio 510	MT8370	2x Cortex-A78; 4x Cortex-A55	v8.2-A
MT8675	MT8675	4x Cortex-A76; 4x Cortex-A55	v8.2-A
MT2713	MT2713		
MT2715	MT2715	4x Cortex-A78; 4x Cortex-A55	v8.2-A
MT2718	MT2718		
MT8678	MT8678		
Cockpit C-X1			
Cockpit C-Y1			
Cockpit C-M1			
Cockpit C-V1			
T830	MT6990	4x Cortex-A55	v8.2-A
T800	MT6980	4x Cortex-A55	v8.2-A
T750	MT6890	4x Cortex-A55	v8.2-A

Table 4

Patent Local Rule 3-1(c): "A chart identifying specifically where each element of each asserted claim is found within each Accused Instrumentality, including for each element that such party contends is governed by 35 U.S.C. § 112 (¶ 6), the identity of the structure(s), act(s), or material(s) in the Accused Instrumentality that performs the claimed function"

Disclosure: See Exhibit D for the '228 Patent Accused Products.

Patent Local Rule 3-1(d): "Whether each element of each asserted claim is claimed to be literally present or present under the doctrine of equivalents in the Accused Instrumentality"

Disclosure: Plaintiff contends that each element of each asserted claim is "literally" infringed in the '228 Patent Accused Products pursuant to Federal Circuit precedent.

In the alternative, and in accordance with Federal Circuit and Supreme Court precedent, Plaintiff further contends that each of the '228 Patent Accused Products for Claims the '228 Asserted Claims comprise structures that are identical or equivalent to the structures disclosed in the '228 Patent.

The '228 Patent Accused Products for the '228 Asserted Claims comprise structures that perform the same function, the same way, to reach the same result, as the structures disclosed in the '228 Patent. Specifically, the structures disclosed in the '228 Patent Accused Products perform the same function, the same way, to reach the same result as the corresponding structures in the

’228 Patent. For the same or similar reasons, any differences between such structures in the Accused Instrumentalities and such structures disclosed in the ’228 Patent are insubstantial.

Patent Local Rule 3-1(e): “For any patent that claims priority to an earlier application, the priority date to which each asserted claim allegedly is entitled.”

Disclosure: Plaintiff contends that the asserted claims are each entitled to a priority date of no later than December 13, 2011, the filing date of the earliest of the applications to which the ’228 Patent claims priority.

Patent Local Rule 3-1(f): “If a party claiming patent infringement wishes to preserve the right to rely, for any purpose, on the assertion that its own apparatus, product, device, process, method, act, or other instrumentality practices the claimed invention, the party must identify, separately for each asserted claim, each such apparatus, product, device, process, method, act, or other instrumentality that incorporates or reflects that particular claim.”

Disclosure: Not applicable.

Patent Local Rule 3-2(a): “Documents (e.g., contracts, purchase orders, invoices, advertisements, marketing materials, offer letters, beta site testing agreements, and third party or 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. A party’s production of a document as required herein shall not constitute an admission that such document evidences or is prior art under 35 U.S.C. §102”

Disclosure: No such documents are in Plaintiff’s possession, custody, or control.

Patent Local Rule 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. R. 3-1(e), whichever is earlier”

Disclosure: Plaintiff’s investigation is ongoing. Plaintiff reserves the right to further amend or modify its disclosures herein—including to supplement its infringement contentions or these disclosures—based on additional information obtained through discovery or other means.

Patent Local Rule 3-2(c): “A copy of the file history for each patent in suit.”

Disclosure: See DPRIME-MTEK0001130-DPRIME-MTEK0001293, produced herewith.

U.S. PATENT NO. 11,507,167

Patent Local Rule 3-1(a): "Each claim of each patent in suit that is allegedly infringed by each opposing party."

Disclosure: Defendant infringes Claims 1, 2, 3, 4, 5, 6, 7, 8, 12, 14, 15, 16, 17, 18, 19, 20 and 21 (the "'167 Asserted Claims") of U.S. Patent No. 11,507,167 (the "'167 Patent").

Patent Local Rule 3-1(b): "Separately for each asserted claim, each accused apparatus, product, device, process, method, act, or other instrumentality ('Accused Instrumentality') of each opposing party of which the party is aware. This identification shall be as specific as possible. Each product, device, and apparatus must be identified by name or model number, if known. Each method or process must be identified by name, if known, or by any product, device, or apparatus which, when used, allegedly results in the practice of the claimed method or process."

Disclosure: For the '167 Asserted Claims, the '167 Patent Accused Products are SoCs or application processors ("APs") based on or derived from ARMv8.2 architecture, as well as subsequent revisions to the ARM architecture such as the ARMv9 architecture, such as the Dimensity 9000 SoCs, and all reasonably similar products. As explained in Plaintiff's Complaint, Defendant infringes Claim 1 of the '167 Patent directly (including through making, using, selling, offering to sell, and importing into the United States the '167 Patent Accused Products) and by inducing consumers to use the '167 Patent Accused Products within the United States in the ordinary, customary, and intended way by, directly or through intermediaries, supplying the '167 Patent Accused Products to consumers within the United States and instructing and encouraging such customers to use the '167 Patent Accused Products in the ordinary, customary, and intended way.

Plaintiff's investigation to date indicates that SoCs or application processors based on or derived from ARMv8.2 architecture, as well as subsequent revisions to the ARM architecture such as the ARMv9 architecture include the devices identified below. On information and belief, Defendant makes, uses, sells, offers to sell, and/or imports into the United States (and induces customers and consumers to make, use, sell, offer to sell, or import into the United States) further

electronic devices containing SoCs or microprocessors based on or derived from ARMv8.2 architecture, as well as subsequent revisions to the ARM architecture such as the ARMv9 architecture, in addition to those chips identified in **Table 5** below.

Accused Product	Model No.	Architecture	ARM ISA
Dimensity 700	MT6833	2x Cortex-A76; 6x Cortex-A55	v8.2-A
Dimensity 800	MT6873	4x Cortex-A76; 4x Cortex-A55	v8.2-A
Dimensity 810	MT6833V	2x Cortex-A76; 6x Cortex-A55	v8.2-A
Dimensity 820	MT6875	4x Cortex-A76; 4x Cortex-A55	v8.2-A
Dimensity 900	MT6877	2x Cortex-A78; 6x Cortex-A55	v8.2-A
Dimensity 920	MT6877T	2x Cortex-A78; 6x Cortex-A55	v8.2-A
Dimensity 930	MT6855	2x Cortex-A78; 6x Cortex-A55	v8.2-A
Dimensity 1000	MT6889Z	4x Cortex-A77; 4x Cortex-A55	v8.2-A
Dimensity 1000C	MT6883Z	4x Cortex-A77; 4x Cortex-A55	v8.2-A
Dimensity 1050	MT6879	2x Cortex-A78; 6x Cortex-A55	v8.2-A
Dimensity 1080	MT6877V	2x Cortex-A78; 6x Cortex-A55	v8.2-A
Dimensity 1100	MT6891Z	4x Cortex-A78; 4x Cortex-A55	v8.2-A
Dimensity 1200	MT6893	1x Cortex-A78; 3x Cortex-A78; 4x Cortex-A55	v8.2-A
Dimensity 1300	MT6893Z	1x Cortex-A78; 3x Cortex-A78; 4x Cortex-A55	v8.2-A
Dimensity 6020	MT6833	2x Cortex-A76; 6x Cortex-A55	v8.2-A
Dimensity 6080	MT6833	2x Cortex-A76; 6x Cortex-A55	v8.2-A
Dimensity 6100+	MT6835	2x Cortex-A76; 6x Cortex-A55	v8.2-A
Dimensity 6300	MT6835T	2x Cortex-A76; 6x Cortex-A55	v8.2-A
Dimensity 7020	MT6855	2x Cortex-A78; 6x Cortex-A55	v8.2-A
Dimensity 7025	MT6855	2x Cortex-A78; 6x Cortex-A55	v8.2-A
Dimensity 7030	MT8775	2x Cortex-A78; 6x Cortex-A55	v8.2-A
Dimensity 7050	MT6877	2x Cortex-A78; 6x Cortex-A55	v8.2-A
Dimensity 7200	MT6886	2x Cortex-A715; 6x Cortex-A510	v9-A
Dimensity 7200 Pro	MT6886	2x Cortex-A715; 6x Cortex-A510	v9-A
Dimensity 7300/7300X	MT6878	4x Cortex-A78; 4x Cortex-A55	v8.2-A
Dimensity 7350		2x Cortex-A715; 6x Cortex-A510	v9-A
Dimensity 7350 Pro		2x Cortex-A715; 6x Cortex-A510	v9-A
Dimensity 8000	MT6895	4x Cortex-A78; 4x Cortex-A55	v8.2-A
Dimensity 8020	MT6891	4x Cortex-A78; 4x Cortex-A55	v8.2-A
Dimensity 8050	MT6893	1x Cortex-A78; 3x Cortex-A78; 4x Cortex-A55	v8.2-A
Dimensity 8100	MT6895Z	4x Cortex-A78; 4x Cortex-A55	v8.2-A
Dimensity 8200	MT6896Z	1x Cortex-A78; 3x Cortex-A78; 4x Cortex-A55	v8.2-A
Dimensity 8200-Ultra		1x Cortex-A78; 3x Cortex-A78; 4x Cortex-A55	v8.2-A
Dimensity 8250		1x Cortex-A78; 3x Cortex-A78; 4x Cortex-A55	v8.2-A
Dimensity 8300	MT6897	1x Cortex-A715; 3x Cortex-A715; 4x Cortex-A510	v9-A
Dimensity 9000	MT6983	1x Cortex-X2; 3x Cortex-A710; 4x Cortex-A510	v9-A

Accused Product	Model No.	Architecture	ARM ISA
Dimensity 9000+	MT6983	1x Cortex-X2; 3x Cortex-A710; 4x Cortex-A510	v9-A
Dimensity 9200	MT6985	1x Cortex-X3; 3x Cortex-A715; 4x Cortex-A510	v9-A
Dimensity 9200+	MT6985	1x Cortex-X3; 3x Cortex-A715; 4x Cortex-A510	v9-A
Dimensity 9300	MT6989	1x Cortex-X4; 3x Cortex-X4; 4x Cortex-A720	v9.2-A
Dimensity 9300+	MT6989	1x Cortex-X4; 3x Cortex-X4; 4x Cortex-A720	v9.2-A
Dimensity 9400	MT6991	1x Cortex-X5; 3x Cortex-X4; 4x Cortex-A720	v9.2-A
Helio G70	MT6769V	2x Cortex-A75; 6x Cortex-A55	v8.2-A
Helio G80	MT6769T	2x Cortex-A75; 6x Cortex-A55	v8.2-A
Helio G85	MT6769Z	2x Cortex-A75; 6x Cortex-A55	v8.2-A
Helio G88	MT6769H	2x Cortex-A75; 6x Cortex-A55	v8.2-A
Helio G90/G90T	MT6785V	2x Cortex-A76; 6x Cortex-A55	v8.2-A
Helio G95	MT6785V	2x Cortex-A76; 6x Cortex-A55	v8.2-A
Helio G96	MT6781	2x Cortex-A76; 6x Cortex-A55	v8.2-A
Helio G99	MT6789	2x Cortex-A76; 6x Cortex-A55	v8.2-A
Helio G100		2x Cortex-A76; 6x Cortex-A55	v8.2-A
Helio P65	MT6768	2x Cortex-A75; 6x Cortex-A55	v8.2-A
Helio P90	MT6779V	2x Cortex-A75; 6x Cortex-A55	v8.2-A
Helio P95	MT6779V	2x Cortex-A75; 6x Cortex-A55	v8.2-A
Kompanio 520	MT8186	2x Cortex-A76; 6x Cortex-A55	v8.2-A
Kompanio 528	MT8186T	2x Cortex-A76; 6x Cortex-A55	v8.2-A
Kompanio 800/800T	MT8771	2x Cortex-A76; 6x Cortex-A55	v8.2-A
Kompanio 820	MT8192	2x Cortex-A76; 6x Cortex-A55	v8.2-A
Kompanio 828		2x Cortex-A76; 6x Cortex-A55	v8.2-A
Kompanio 838	MT8188	2x Cortex-A78; 6x Cortex-A55	v8.2-A
Kompanio 900T	MT8791	2x Cortex-A78; 6x Cortex-A55	v8.2-A
Kompanio 1200	MT8195	4x Cortex-A78; 4x Cortex-A55	v8.2-A
Kompanio 1300T	MT8797	4x Cortex-A78; 4x Cortex-A55	v8.2-A
Kompanio 1380	MT8195T	4x Cortex-A78; 4x Cortex-A55	v8.2-A
Pentonic 2000	MT9902/ MT9982	4x Cortex-A76	v8.2-A
MT9685		4x Cortex-A55	v8.2-A
MT9638		4x Cortex-A55	v8.2-A
MT9612		4x Cortex-A55	v8.2-A
Genio 1200	MT8395	4x Cortex-A78; 4x Cortex-A55	v8.2-A
Genio 700	MT8390	2x Cortex-A78; 6x Cortex-A55	v8.2-A
Genio 510	MT8370	2x Cortex-A78; 4x Cortex-A55	v8.2-A
MT8675	MT8675	4x Cortex-A76; 4x Cortex-A55	v8.2-A
MT2713	MT2713		
MT2715	MT2715	4x Cortex-A78; 4x Cortex-A55	v8.2-A
MT2718	MT2718		
MT8678	MT8678		

Accused Product	Model No.	Architecture	ARM ISA
Cockpit C-X1			
Cockpit C-Y1			
Cockpit C-M1			
Cockpit C-V1			
T830	MT6990	4x Cortex-A55	v8.2-A
T800	MT6980	4x Cortex-A55	v8.2-A
T750	MT6890	4x Cortex-A55	v8.2-A

Table 5

Patent Local Rule 3-1(c): "A chart identifying specifically where each element of each asserted claim is found within each Accused Instrumentality, including for each element that such party contends is governed by 35 U.S.C. § 112 (¶ 6), the identity of the structure(s), act(s), or material(s) in the Accused Instrumentality that performs the claimed function"

Disclosure: See Exhibit E for the '167 Patent Accused Products.

Patent Local Rule 3-1(d): "Whether each element of each asserted claim is claimed to be literally present or present under the doctrine of equivalents in the Accused Instrumentality"

Disclosure: Plaintiff contends that each element of each asserted claim is "literally" infringed in the '167 Patent Accused Products pursuant to Federal Circuit precedent.

In the alternative, and in accordance with Federal Circuit and Supreme Court precedent, Plaintiff further contends that each of the '167 Patent Accused Products for Claims the '167 Asserted Claims comprise structures that are identical or equivalent to the structures disclosed in the '167 Patent.

The '167 Patent Accused Products for the '167 Asserted Claims comprise structures that perform the same function, the same way, to reach the same result, as the structures disclosed in the '167 Patent. Specifically, the structures disclosed in the '167 Patent Accused Products perform the same function, the same way, to reach the same result as the corresponding structures in the '167 Patent. For the same or similar reasons, any differences between such structures in the Accused Instrumentalities and such structures disclosed in the '167 Patent are insubstantial.

Patent Local Rule 3-1(e): "For any patent that claims priority to an earlier application, the priority date to which each asserted claim allegedly is entitled."

Disclosure: Plaintiff contends that the asserted claims are each entitled to a priority date of no later than March 11, 2013, the filing date of the earliest of the applications to which the '167 Patent claims priority.

Patent Local Rule 3-1(f): "If a party claiming patent infringement wishes to preserve the right to rely, for any purpose, on the assertion that its own apparatus, product, device, process, method, act, or other instrumentality practices the claimed invention, the party must identify, separately for each asserted claim, each such apparatus, product, device, process, method, act, or other instrumentality that incorporates or reflects that particular claim."

Disclosure: Not applicable.

Patent Local Rule 3-2(a): "Documents (e.g., contracts, purchase orders, invoices, advertisements, marketing materials, offer letters, beta site testing agreements, and third party or 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. A party's production of a document as required herein shall not constitute an admission that such document evidences or is prior art under 35 U.S.C. §102"

Disclosure: No such documents are in Plaintiff's possession, custody, or control.

Patent Local Rule 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. R. 3-1(e), whichever is earlier"

Disclosure: See invention disclosure statement INTEL000124-131 produced herewith. Any redaction in this document was made by third-party Intel Corp., not Plaintiff.

Patent Local Rule 3-2(c): "A copy of the file history for each patent in suit."

Disclosure: See DPRIME-MTEK0000769-DPRIME-MTEK0001129, produced herewith.

U.S. PATENT NO. 9,887,838

Patent Local Rule 3-1(a): "Each claim of each patent in suit that is allegedly infringed by each opposing party."

Disclosure: Defendant infringes Claims 1, 3-6, 9-15, 17-24 (the '838 Asserted Claims) of U.S. Patent No. 9,887,838 (the "'838 Patent").

Patent Local Rule 3-1(b): "Separately for each asserted claim, each accused apparatus, product, device, process, method, act, or other instrumentality ('Accused Instrumentality') of each opposing party of which the party is aware. This identification shall be as specific as possible. Each product, device, and apparatus must be identified by name or model number, if known. Each method or process must be identified by name, if known, or by any product, device, or apparatus which, when used, allegedly results in the practice of the claimed method or process."

Disclosure: Claim 1: For Claim 1, the '838 Patent CryptoCore Accused Products are electronic devices containing SoCs or microprocessors manufactured by, for, or on behalf of MediaTek with software utilizing MediaTek's CryptoCore cryptographic module and based on or derived from ARMv8.2 architecture as well as subsequent revisions to the ARM architecture such as the ARMv9 architecture, such as the Dimensity 9200 SoCs, and all reasonably similar products (the "'838 Patent CryptoCore Accused Products"), and the '838 Patent Securyzr Accused Products are electronic devices containing SoCs or microprocessors manufactured by, for, or on behalf of MediaTek with software utilizing the Securyzr cryptographic module and based on or derived from ARMv9 architecture as well as subsequent revisions to the ARM architecture such as the ARMv9.2 architecture, such as the Dimensity 9300 SoCs, and all reasonably similar products (the "'838 Patent Securyzr Accused Products"), the '838 CryptoCore Accused Products and '838 Securyzr Accused Products collectively the "'838 Patent Accused Products".

As explained in Plaintiff's Complaint, Defendant infringes this claim directly (including through making, using, selling, offering to sell, and importing into the United States) the '838 Patent Accused Products; by inducing customers and consumers to directly infringe this claim; by offering to sell or selling within the United States or importing into the United States components of the patented invention or apparatus for use in practicing the patented process, constituting a material part of the invention, knowing the same to be especially made or especially adapted for use in an infringement of such patent, and not a staple article or commodity of commerce suitable for substantial noninfringing use; by supplying or causing to be supplied in or from the United

States all or a substantial portion of the components of the patented invention of this claim, where such components are uncombined in whole or in part, in such manner as to actively induce the combination of such components outside of the United States in a manner that would infringe the patent if such combination occurred within the United States; and by supplying or causing to be supplied in or from the United States components of the patented invention of at least this claim that are especially made or especially adapted for use in the invention and not staple articles or commodities of commerce suitable for substantial noninfringing use, where such components are uncombined in whole or in part, knowing that such components are so made or adapted and intending that such components will be combined outside of the United States in a manner that would infringe the patent if such combination occurred within the United States.

Plaintiff's investigation to date indicates that the following devices include SoCs or microprocessors based on or derived from ARMv8 architecture, as well as subsequent revisions to the ARM architecture such as the ARMv9 architecture, and include support for MediaTek's CryptoCore cryptographic module. On information and belief, Defendant makes, uses, sells, offers to sell, and/or imports into the United States further devices supporting MediaTek's CryptoCore cryptographic module (and induce customers and consumers to make, use, sell, offer to sell, or import into the United States further devices including MediaTek's CryptoCore cryptographic module support), in addition to those devices identified in **Table 6.1** below:

Accused Product	Model No.	Architecture	ARM ISA
Helio X30	MT6799	2× Cortex-A73; 4× Cortex-A53; 4× Cortex-A35	v8-A
Helio P60	MT6771	4× Cortex-A73; 4× Cortex-A53	v8-A
Helio P22	MT6762	4× Cortex-A53; 4× Cortex-A53	v8-A
Helio P23	MT6763	4× Cortex-A53; 4× Cortex-A53	v8-A
Helio A22	MT6761V/WAB MT6761V/WBB	4× Cortex-A53	v8-A
MT6739	MT6739	4× Cortex-A53	v8-A
Kompanio 500 / Helio P60T	MT8183	4× Cortex-A73; 4× Cortex-A53	v8-A

Accused Product	Model No.	Architecture	ARM ISA
MT8788	MT8788	4× Cortex-A73; 4× Cortex-A53	v8-A
MT8766	MT8766	4× Cortex-A53	v8-A
MT8786	MT8786	4× Cortex-A53; 4× Cortex-A53	v8-A
Dimensity 700	MT6833	2x Cortex-A76; 6x Cortex-A55	v8.2-A
Dimensity 800	MT6873	4x Cortex-A76; 4x Cortex-A55	v8.2-A
Dimensity 810	MT6833V	2x Cortex-A76; 6x Cortex-A55	v8.2-A
Dimensity 820	MT6875	4x Cortex-A76; 4x Cortex-A55	v8.2-A
Dimensity 900	MT6877	2x Cortex-A78; 6x Cortex-A55	v8.2-A
Dimensity 920	MT6877T	2x Cortex-A78; 6x Cortex-A55	v8.2-A
Dimensity 930	MT6855	2x Cortex-A78; 6x Cortex-A55	v8.2-A
Dimensity 1000	MT6889Z	4x Cortex-A77; 4x Cortex-A55	v8.2-A
Dimensity 1000C	MT6883Z	4x Cortex-A77; 4x Cortex-A55	v8.2-A
Dimensity 1050	MT6879	2x Cortex-A78; 6x Cortex-A55	v8.2-A
Dimensity 1080	MT6877V	2x Cortex-A78; 6x Cortex-A55	v8.2-A
Dimensity 1100	MT6891Z	4x Cortex-A78; 4x Cortex-A55	v8.2-A
Dimensity 1200	MT6893	1x Cortex-A78; 3x Cortex-A78; 4x Cortex-A55	v8.2-A
Dimensity 1300	MT6893Z	1x Cortex-A78; 3x Cortex-A78; 4x Cortex-A55	v8.2-A
Dimensity 6020	MT6833	2x Cortex-A76; 6x Cortex-A55	v8.2-A
Dimensity 6080	MT6833	2x Cortex-A76; 6x Cortex-A55	v8.2-A
Dimensity 6100+	MT6835	2x Cortex-A76; 6x Cortex-A55	v8.2-A
Dimensity 6300	MT6835T	2x Cortex-A76; 6x Cortex-A55	v8.2-A
Dimensity 7020	MT6855	2x Cortex-A78; 6x Cortex-A55	v8.2-A
Dimensity 7025	MT6855	2x Cortex-A78; 6x Cortex-A55	v8.2-A
Dimensity 7030	MT8775	2x Cortex-A78; 6x Cortex-A55	v8.2-A
Dimensity 7050	MT6877	2x Cortex-A78; 6x Cortex-A55	v8.2-A
Dimensity 7200	MT6886	2x Cortex-A715; 6x Cortex-A510	v9-A
Dimensity 7200 Pro	MT6886	2x Cortex-A715; 6x Cortex-A510	v9-A
Dimensity 7300/7300X	MT6878	4x Cortex-A78; 4x Cortex-A55	v8.2-A
Dimensity 7350		2x Cortex-A715; 6x Cortex-A510	v9-A
Dimensity 7350 Pro		2x Cortex-A715; 6x Cortex-A510	v9-A
Dimensity 8000	MT6895	4x Cortex-A78; 4x Cortex-A55	v8.2-A
Dimensity 8020	MT6891	4x Cortex-A78; 4x Cortex-A55	v8.2-A
Dimensity 8050	MT6893	1x Cortex-A78; 3x Cortex-A78; 4x Cortex-A55	v8.2-A
Dimensity 8100	MT6895Z	4x Cortex-A78; 4x Cortex-A55	v8.2-A
Dimensity 8200	MT6896Z	1x Cortex-A78; 3x Cortex-A78; 4x Cortex-A55	v8.2-A
Dimensity 8200-Ultra		1x Cortex-A78; 3x Cortex-A78; 4x Cortex-A55	v8.2-A
Dimensity 8250		1x Cortex-A78; 3x Cortex-A78; 4x Cortex-A55	v8.2-A

Accused Product	Model No.	Architecture	ARM ISA
Dimensity 8300	MT6897	1x Cortex-A715; 3x Cortex-A715; 4x Cortex-A510	v9-A
Dimensity 9000	MT6983	1x Cortex-X2; 3x Cortex-A710; 4x Cortex-A510	v9-A
Dimensity 9000+	MT6983	1x Cortex-X2; 3x Cortex-A710; 4x Cortex-A510	v9-A
Dimensity 9200	MT6985	1x Cortex-X3; 3x Cortex-A715; 4x Cortex-A510	v9-A
Dimensity 9200+	MT6985	1x Cortex-X3; 3x Cortex-A715; 4x Cortex-A510	v9-A
Helio G70	MT6769V	2x Cortex-A75; 6x Cortex-A55	v8.2-A
Helio G80	MT6769T	2x Cortex-A75; 6x Cortex-A55	v8.2-A
Helio G85	MT6769Z	2x Cortex-A75; 6x Cortex-A55	v8.2-A
Helio G88	MT6769H	2x Cortex-A75; 6x Cortex-A55	v8.2-A
Helio G90/G90T	MT6785V	2x Cortex-A76; 6x Cortex-A55	v8.2-A
Helio G95	MT6785V	2x Cortex-A76; 6x Cortex-A55	v8.2-A
Helio G96	MT6781	2x Cortex-A76; 6x Cortex-A55	v8.2-A
Helio G99	MT6789	2x Cortex-A76; 6x Cortex-A55	v8.2-A
Helio G100		2x Cortex-A76; 6x Cortex-A55	v8.2-A
Helio P65	MT6768	2x Cortex-A75; 6x Cortex-A55	v8.2-A
Helio P90	MT6779V	2x Cortex-A75; 6x Cortex-A55	v8.2-A
Helio P95	MT6779V	2x Cortex-A75; 6x Cortex-A55	v8.2-A
Kompanio 520	MT8186	2x Cortex-A76; 6x Cortex-A55	v8.2-A
Kompanio 528	MT8186T	2x Cortex-A76; 6x Cortex-A55	v8.2-A
Kompanio 800/800T	MT8771	2x Cortex-A76; 6x Cortex-A55	v8.2-A
Kompanio 820	MT8192	2x Cortex-A76; 6x Cortex-A55	v8.2-A
Kompanio 828		2x Cortex-A76; 6x Cortex-A55	v8.2-A
Kompanio 838	MT8188	2x Cortex-A78; 6x Cortex-A55	v8.2-A
Kompanio 900T	MT8791	2x Cortex-A78; 6x Cortex-A55	v8.2-A
Kompanio 1200	MT8195	4x Cortex-A78; 4x Cortex-A55	v8.2-A
Kompanio 1300T	MT8797	4x Cortex-A78; 4x Cortex-A55	v8.2-A
Kompanio 1380	MT8195T	4x Cortex-A78; 4x Cortex-A55	v8.2-A
Pentonic 2000	MT9902/ MT9982	4x Cortex-A76	v8.2-A
MT9685		4x Cortex-A55	v8.2-A
MT9638		4x Cortex-A55	v8.2-A
MT9612		4x Cortex-A55	v8.2-A
Genio 1200	MT8395	4x Cortex-A78; 4x Cortex-A55	v8.2-A
Genio 700	MT8390	2x Cortex-A78; 6x Cortex-A55	v8.2-A
Genio 510	MT8370	2x Cortex-A78; 4x Cortex-A55	v8.2-A
MT8675	MT8675	4x Cortex-A76; 4x Cortex-A55	v8.2-A
MT2713	MT2713		
MT2715	MT2715	4x Cortex-A78; 4x Cortex-A55	v8.2-A
MT2718	MT2718		

Accused Product	Model No.	Architecture	ARM ISA
MT8678	MT8678		
Cockpit C-X1			
Cockpit C-Y1			
Cockpit C-M1			
Cockpit C-V1			
T830	MT6990	4x Cortex-A55	v8.2-A
T800	MT6980	4x Cortex-A55	v8.2-A
T750	MT6890	4x Cortex-A55	v8.2-A

Table 6.1

Plaintiff's investigation to date indicates that the following devices include SoCs or microprocessors based on or derived from ARMv9 architecture, as well as subsequent revisions to the ARM architecture such as the ARMv9.2 architecture, and include support for MediaTek's Securyzr cryptographic module. On information and belief, Defendant makes, uses, sells, offers to sell, and/or imports into the United States further devices supporting MediaTek's Securyzr cryptographic module (and induce customers and consumers to make, use, sell, offer to sell, or import into the United States further devices including MediaTek's Securyzr cryptographic module support), in addition to those devices identified in **Table 6.2** below:

Accused Product	Model No.	Architecture	ARM ISA
Dimensity 9300	MT6989	1x Cortex-X4; 3x Cortex-X4; 4x Cortex-A720	v9.2-A
Dimensity 9300+		1x Cortex-X4; 3x Cortex-X4; 4x Cortex-A720	v9.2-A
Dimensity 9400	MT6991	1x Cortex-X5; 3x Cortex-X4; 4x Cortex-A720	v9.2-A

Table 6.2

Claim 3: See Claim 1, above, which is incorporated by reference as if set forth in full.

Claim 4: See Claim 1, above, which is incorporated by reference as if set forth in full.

Claim 5: See Claim 1, above, which is incorporated by reference as if set forth in full.

Claim 6: See Claim 1, above, which is incorporated by reference as if set forth in full.

Claim 9: For Claim 9, the '838 Patent Accused Products, identified in the Table above, perform the method of claim 9. Defendant infringes Claim 9 of the '838 Patent directly by using

the ’838 Patent Accused Products and by inducing customers and consumers to directly infringe Claim 9 of the ’838 Patent.

Claim 10: See Claim 9, above, which is incorporated by reference as if set forth in full.

Claim 11: See Claim 9, above, which is incorporated by reference as if set forth in full.

Claim 12: See Claim 9, above, which is incorporated by reference as if set forth in full.

Claim 13: See Claim 9, above, which is incorporated by reference as if set forth in full.

Claim 14: See Claim 9, above, which is incorporated by reference as if set forth in full.

Claim 15: See Claim 9, above, which is incorporated by reference as if set forth in full.

Claim 17: For Claim 17, the ’838 Patent Accused Products, identified in the table above, contain one or more non-transitory machine-readable storage media as described in Claim 17. As with Claim 1, Defendant infringes Claim 17 of the ’838 Patent directly (including through making, using, selling, offering to sell, and importing into the United States) the ’838 Patent Accused Products; by inducing customers and consumers to directly infringe Claim 17 of the ’838 Patent; and by supplying or causing to be supplied in or from the United States all or a substantial portion of the components of the patented invention of Claim 17, where such components are uncombined in whole or in part, in such manner as to actively induce the combination of such components outside of the United States in a manner that would infringe the patent if such combination occurred within the United States;.

Claim 18: See Claim 17, above, which is incorporated by reference as if set forth in full.

Claim 19: See Claim 17, above, which is incorporated by reference as if set forth in full.

Claim 20: See Claim 17, above, which is incorporated by reference as if set forth in full.

Claim 21: See Claim 17, above, which is incorporated by reference as if set forth in full.

Claim 22: See Claim 17, above, which is incorporated by reference as if set forth in full.

Claim 23: See Claim 17, above, which is incorporated by reference as if set forth in full.

Claim 24: See Claim 17, above, which is incorporated by reference as if set forth in full.

Patent Local Rule 3-1(c): "A chart identifying specifically where each element of each asserted claim is found within each Accused Instrumentality, including for each element that such party contends is governed by 35 U.S.C. § 112 (¶ 6), the identity of the structure(s), act(s), or material(s) in the Accused Instrumentality that performs the claimed function"

Disclosure: See Exhibit F for the '838 Patent Accused Products.

Patent Local Rule 3-1(d): "Whether each element of each asserted claim is claimed to be literally present or present under the doctrine of equivalents in the Accused Instrumentality"

Disclosure: Plaintiff contends that each element of each asserted claim is "literally" infringed in the '838 Patent Accused Products pursuant to Federal Circuit precedent.

In the alternative, and in accordance with Federal Circuit and Supreme Court precedent, Plaintiff further contends that each of the '838 Patent Accused Products for Claims the '838 Asserted Claims comprise structures that are identical or equivalent to the structures disclosed in the '838 Patent.

The '838 Patent Accused Products for the '838 Asserted Claims comprise structures that perform the same function, the same way, to reach the same result, as the structures disclosed in the '838 Patent. Specifically, the structures disclosed in the '838 Patent Accused Products perform the same function, the same way, to reach the same result as the corresponding structures in the '838 Patent. For the same or similar reasons, any differences between such structures in the Accused Instrumentalities and such structures disclosed in the '838 Patent are insubstantial.

Patent Local Rule 3-1(e): "For any patent that claims priority to an earlier application, the priority date to which each asserted claim allegedly is entitled."

Disclosure: Plaintiff contends that the asserted claims are each entitled to a priority date of no later than December 15, 2011, the filing date of the earliest of the applications to which the '838 Patent claims priority.

Patent Local Rule 3-1(f): "If a party claiming patent infringement wishes to preserve the right to rely, for any purpose, on the assertion that its own apparatus, product, device, process, method, act, or other instrumentality practices the claimed invention, the party must identify, separately for each asserted claim, each such apparatus, product, device, process, method, act, or other instrumentality that incorporates or reflects that particular claim."

Disclosure: Not applicable.

Patent Local Rule 3-2(a): "Documents (e.g., contracts, purchase orders, invoices, advertisements, marketing materials, offer letters, beta site testing agreements, and third party or 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. A party's production of a document as required herein shall not constitute an admission that such document evidences or is prior art under 35 U.S.C. §102"

Disclosure: No such documents are in Plaintiff's possession, custody, or control.

Patent Local Rule 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. R. 3-1(e), whichever is earlier"

Disclosure: See invention disclosure statement produced herewith, INTEL0000101-115.

Any redaction in this document was made by third-party Intel Corp., not Plaintiff.

Patent Local Rule 3-2(c): "A copy of the file history for each patent in suit."

Disclosure: DPRIME-MTEK0001294-DPRIME-MTEK0002114, produced herewith.

U.S. PATENT NO. 10,705,960

Patent Local Rule 3-1(a): "Each claim of each patent in suit that is allegedly infringed by each opposing party."

Disclosure: Defendant infringes Claims 1, 2, 3, 9, 10, 11, 15, 16, 19, 20 and 21 (the "'960 Asserted Claims") of U.S. Patent No. 10,705,960 (the "'960 Patent").

Patent Local Rule 3-1(b): "Separately for each asserted claim, each accused apparatus, product, device, process, method, act, or other instrumentality ('Accused Instrumentality') of each opposing party of which the party is aware. This identification shall be as specific as possible. Each product, device, and apparatus must be identified by name or model number, if known. Each method or process must be identified by name, if known, or by any product, device, or apparatus which, when used, allegedly results in the practice of the claimed method or process."

<u>Disclosure:</u> Claim 1: For Claim 1, the '919 Patent Accused Products are SoCs or application processors ("APs") based on or derived from ARMv8.2 architecture, as well as subsequent revisions to the ARM architecture such as the ARMv9 architecture, such as the Dimensity 9000 SoCs, and all reasonably similar products. As explained in Plaintiff's Complaint, Defendant infringes Claim 1 of the '919 Patent directly (including through making, using, selling, offering to sell, and importing into the United States the '919 Patent Accused Products) and by inducing consumers to use the '919 Patent Accused Products within the United States in the ordinary, customary, and intended way by, directly or through intermediaries, supplying the '919 Patent Accused Products to consumers within the United States and instructing and encouraging such customers to use the '919 Patent Accused Products in the ordinary, customary, and intended way.

Plaintiff's investigation to date indicates that SoCs or application processors based on or derived from ARMv8.2 architecture, as well as subsequent revisions to the ARM architecture such as the ARMv9 architecture include the devices identified below. On information and belief, Defendant makes, uses, sells, offers to sell, and/or imports into the United States (and induces customers and consumers to make, use, sell, offer to sell, or import into the United States) further electronic devices containing SoCs or microprocessors based on or derived from ARMv8.2 architecture, as well as subsequent revisions to the ARM architecture such as the ARMv9 architecture, in addition to those devices identified in **Table 7** below:

Accused Product	Model No.	Architecture	ARM ISA
Dimensity 700	MT6833	2x Cortex-A76; 6x Cortex-A55	v8.2-A
Dimensity 800	MT6873	4x Cortex-A76; 4x Cortex-A55	v8.2-A
Dimensity 810	MT6833V	2x Cortex-A76; 6x Cortex-A55	v8.2-A
Dimensity 820	MT6875	4x Cortex-A76; 4x Cortex-A55	v8.2-A
Dimensity 900	MT6877	2x Cortex-A78; 6x Cortex-A55	v8.2-A
Dimensity 920	MT6877T	2x Cortex-A78; 6x Cortex-A55	v8.2-A
Dimensity 930	MT6855	2x Cortex-A78; 6x Cortex-A55	v8.2-A

Accused Product	Model No.	Architecture	ARM ISA
Dimensity 1000	MT6889Z	4x Cortex-A77; 4x Cortex-A55	v8.2-A
Dimensity 1000C	MT6883Z	4x Cortex-A77; 4x Cortex-A55	v8.2-A
Dimensity 1050	MT6879	2x Cortex-A78; 6x Cortex-A55	v8.2-A
Dimensity 1080	MT6877V	2x Cortex-A78; 6x Cortex-A55	v8.2-A
Dimensity 1100	MT6891Z	4x Cortex-A78; 4x Cortex-A55	v8.2-A
Dimensity 1200	MT6893	1x Cortex-A78; 3x Cortex-A78; 4x Cortex-A55	v8.2-A
Dimensity 1300	MT6893Z	1x Cortex-A78; 3x Cortex-A78; 4x Cortex-A55	v8.2-A
Dimensity 6020	MT6833	2x Cortex-A76; 6x Cortex-A55	v8.2-A
Dimensity 6080	MT6833	2x Cortex-A76; 6x Cortex-A55	v8.2-A
Dimensity 6100+	MT6835	2x Cortex-A76; 6x Cortex-A55	v8.2-A
Dimensity 6300	MT6835T	2x Cortex-A76; 6x Cortex-A55	v8.2-A
Dimensity 7020	MT6855	2x Cortex-A78; 6x Cortex-A55	v8.2-A
Dimensity 7025	MT6855	2x Cortex-A78; 6x Cortex-A55	v8.2-A
Dimensity 7030	MT8775	2x Cortex-A78; 6x Cortex-A55	v8.2-A
Dimensity 7050	MT6877	2x Cortex-A78; 6x Cortex-A55	v8.2-A
Dimensity 7200	MT6886	2x Cortex-A715; 6x Cortex-A510	v9-A
Dimensity 7200 Pro	MT6886	2x Cortex-A715; 6x Cortex-A510	v9-A
Dimensity 7300/7300X	MT6878	4x Cortex-A78; 4x Cortex-A55	v8.2-A
Dimensity 7350		2x Cortex-A715; 6x Cortex-A510	v9-A
Dimensity 7350 Pro		2x Cortex-A715; 6x Cortex-A510	v9-A
Dimensity 8000	MT6895	4x Cortex-A78; 4x Cortex-A55	v8.2-A
Dimensity 8020	MT6891	4x Cortex-A78; 4x Cortex-A55	v8.2-A
Dimensity 8050	MT6893	1x Cortex-A78; 3x Cortex-A78; 4x Cortex-A55	v8.2-A
Dimensity 8100	MT6895Z	4x Cortex-A78; 4x Cortex-A55	v8.2-A
Dimensity 8200	MT6896Z	1x Cortex-A78; 3x Cortex-A78; 4x Cortex-A55	v8.2-A
Dimensity 8200-Ultra		1x Cortex-A78; 3x Cortex-A78; 4x Cortex-A55	v8.2-A
Dimensity 8250		1x Cortex-A78; 3x Cortex-A78; 4x Cortex-A55	v8.2-A
Dimensity 8300	MT6897	1x Cortex-A715; 3x Cortex-A715; 4x Cortex-A510	v9-A
Dimensity 9000	MT6983	1x Cortex-X2; 3x Cortex-A710; 4x Cortex-A510	v9-A
Dimensity 9000+	MT6983	1x Cortex-X2; 3x Cortex-A710; 4x Cortex-A510	v9-A
Dimensity 9200	MT6985	1x Cortex-X3; 3x Cortex-A715; 4x Cortex-A510	v9-A
Dimensity 9200+	MT6985	1x Cortex-X3; 3x Cortex-A715; 4x Cortex-A510	v9-A
Dimensity 9300	MT6989	1x Cortex-X4; 3x Cortex-X4; 4x Cortex-A720	v9.2-A
Dimensity 9300+	MT6989	1x Cortex-X4; 3x Cortex-X4; 4x Cortex-A720	v9.2-A
Dimensity 9400	MT6991	1x Cortex-X5; 3x Cortex-X4; 4x Cortex-A720	v9.2-A
Helio G70	MT6769V	2x Cortex-A75; 6x Cortex-A55	v8.2-A
Helio G80	MT6769T	2x Cortex-A75; 6x Cortex-A55	v8.2-A
Helio G85	MT6769Z	2x Cortex-A75; 6x Cortex-A55	v8.2-A
Helio G88	MT6769H	2x Cortex-A75; 6x Cortex-A55	v8.2-A
Helio G90/G90T	MT6785V	2x Cortex-A76; 6x Cortex-A55	v8.2-A
Helio G95	MT6785V	2x Cortex-A76; 6x Cortex-A55	v8.2-A

Accused Product	Model No.	Architecture	ARM ISA
Helio G96	MT6781	2x Cortex-A76; 6x Cortex-A55	v8.2-A
Helio G99	MT6789	2x Cortex-A76; 6x Cortex-A55	v8.2-A
Helio G100		2x Cortex-A76; 6x Cortex-A55	v8.2-A
Helio P65	MT6768	2x Cortex-A75; 6x Cortex-A55	v8.2-A
Helio P90	MT6779V	2x Cortex-A75; 6x Cortex-A55	v8.2-A
Helio P95	MT6779V	2x Cortex-A75; 6x Cortex-A55	v8.2-A
Kompanio 520	MT8186	2x Cortex-A76; 6x Cortex-A55	v8.2-A
Kompanio 528	MT8186T	2x Cortex-A76; 6x Cortex-A55	v8.2-A
Kompanio 800/800T	MT8771	2x Cortex-A76; 6x Cortex-A55	v8.2-A
Kompanio 820	MT8192	2x Cortex-A76; 6x Cortex-A55	v8.2-A
Kompanio 828		2x Cortex-A76; 6x Cortex-A55	v8.2-A
Kompanio 838	MT8188	2x Cortex-A78; 6x Cortex-A55	v8.2-A
Kompanio 900T	MT8791	2x Cortex-A78; 6x Cortex-A55	v8.2-A
Kompanio 1200	MT8195	4x Cortex-A78; 4x Cortex-A55	v8.2-A
Kompanio 1300T	MT8797	4x Cortex-A78; 4x Cortex-A55	v8.2-A
Kompanio 1380	MT8195T	4x Cortex-A78; 4x Cortex-A55	v8.2-A
Pentonic 2000	MT9902/ MT9982	4x Cortex-A76	v8.2-A
MT9685		4x Cortex-A55	v8.2-A
MT9638		4x Cortex-A55	v8.2-A
MT9612		4x Cortex-A55	v8.2-A
Genio 1200	MT8395	4x Cortex-A78; 4x Cortex-A55	v8.2-A
Genio 700	MT8390	2x Cortex-A78; 6x Cortex-A55	v8.2-A
Genio 510	MT8370	2x Cortex-A78; 4x Cortex-A55	v8.2-A
MT8675	MT8675	4x Cortex-A76; 4x Cortex-A55	v8.2-A
MT2713	MT2713		
MT2715	MT2715	4x Cortex-A78; 4x Cortex-A55	v8.2-A
MT2718	MT2718		
MT8678	MT8678		
Cockpit C-X1			
Cockpit C-Y1			
Cockpit C-M1			
Cockpit C-V1			
T830	MT6990	4x Cortex-A55	v8.2-A
T800	MT6980	4x Cortex-A55	v8.2-A
T750	MT6890	4x Cortex-A55	v8.2-A

Table 7

Claim 2: See Claim 1, above, which is incorporated by reference as if set forth in full.

Claim 3: See Claim 1, above, which is incorporated by reference as if set forth in full.

Claim 9: See Claim 1, above, which is incorporated by reference as if set forth in full.

Claim 10: See Claim 1, above, which is incorporated by reference as if set forth in full.

Claim 11: See Claim 1, above, which is incorporated by reference as if set forth in full.

Claim 15: For Claim 15, the '960 Patent Accused Products, identified in Table 7 above, perform the method of claim 15. Defendant infringes Claim 15 of the '960 Patent directly by using the '960 Patent Accused Products and by inducing customers and consumers to directly infringe Claim 15 of the '960 Patent.

Claim 16: See Claim 15, above, which is incorporated by reference as if set forth in full.

Claim 19: See Claim 15, above, which is incorporated by reference as if set forth in full.

Claim 20: For Claim 20, the '960 Patent Accused Products, identified in Table 7 above, are a machine as described in Claim 20. As with Claim 1, Defendant infringes Claim 20 of the '960 Patent directly (including through making, using, selling, offering to sell, and importing into the United States) and by inducing customers and consumers to directly infringe Claim 20 of the '960 Patent.

Claim 21: See Claim 20, above, which is incorporated by reference as if set forth in full.

Patent Local Rule 3-1(c): "A chart identifying specifically where each element of each asserted claim is found within each Accused Instrumentality, including for each element that such party contends is governed by 35 U.S.C. § 112 (¶ 6), the identity of the structure(s), act(s), or material(s) in the Accused Instrumentality that performs the claimed function"

Disclosure: See Exhibit G for the '960 Patent Accused Products.

Patent Local Rule 3-1(d): "Whether each element of each asserted claim is claimed to be literally present or present under the doctrine of equivalents in the Accused Instrumentality"

Disclosure: Plaintiff contends that each element of each asserted claim is "literally" infringed in the '960 Patent Accused Products pursuant to Federal Circuit precedent.

In the alternative, and in accordance with Federal Circuit and Supreme Court precedent, Plaintiff further contends that each of the '960 Patent Accused Products for Claims the '960

Asserted Claims comprise structures that are identical or equivalent to the structures disclosed in the ’960 Patent.

The ’960 Patent Accused Products for the ’960 Asserted Claims comprise structures that perform the same function, the same way, to reach the same result, as the structures disclosed in the ’960 Patent. Specifically, the structures disclosed in the ’960 Patent Accused Products perform the same function, the same way, to reach the same result as the corresponding structures in the ’960 Patent. For the same or similar reasons, any differences between such structures in the Accused Instrumentalities and such structures disclosed in the ’960 Patent are insubstantial.

Patent Local Rule 3-1(e): “For any patent that claims priority to an earlier application, the priority date to which each asserted claim allegedly is entitled.”

Disclosure: Plaintiff contends that the asserted claims are each entitled to a priority date of no later than December 28, 2012, the filing date of the earliest of the applications to which the ’960 Patent claims priority.

Patent Local Rule 3-1(f): “If a party claiming patent infringement wishes to preserve the right to rely, for any purpose, on the assertion that its own apparatus, product, device, process, method, act, or other instrumentality practices the claimed invention, the party must identify, separately for each asserted claim, each such apparatus, product, device, process, method, act, or other instrumentality that incorporates or reflects that particular claim.”

Disclosure: Not applicable.

Patent Local Rule 3-2(a): “Documents (e.g., contracts, purchase orders, invoices, advertisements, marketing materials, offer letters, beta site testing agreements, and third party or 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. A party’s production of a document as required herein shall not constitute an admission that such document evidences or is prior art under 35 U.S.C. §102”

Disclosure: No such documents are in Plaintiff’s possession, custody, or control.

Patent Local Rule 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. R. 3-1(e), whichever is earlier”

Disclosure: See invention disclosure statement INTEL0000116-123 produced herewith. Any redaction in this document was made by third-party Intel Corp., not Plaintiff.

Patent Local Rule 3-2(c): "A copy of the file history for each patent in suit."

Disclosure: See DPRIME-MTEK0002387-DPRIME-MTEK0002660, produced herewith.

U.S. PATENT NO. 10,725,919

Patent Local Rule 3-1(a): "Each claim of each patent in suit that is allegedly infringed by each opposing party."

Disclosure: Defendant infringes Claims 1, 3, 4, 6, 8, 10, 11, 12, 16, 17, 18, 19, 20 and 21 (the "'919 Asserted Claims") of U.S. Patent No. 10,725,919 (the "'919 Patent").

Patent Local Rule 3-1(b): "Separately for each asserted claim, each accused apparatus, product, device, process, method, act, or other instrumentality ('Accused Instrumentality') of each opposing party of which the party is aware. This identification shall be as specific as possible. Each product, device, and apparatus must be identified by name or model number, if known. Each method or process must be identified by name, if known, or by any product, device, or apparatus which, when used, allegedly results in the practice of the claimed method or process."

Disclosure: Claim 1: For Claim 1, the '919 Patent Accused Products are SoCs or application processors ("APs") based on or derived from ARMv8.2 architecture, as well as subsequent revisions to the ARM architecture such as the ARMv9 architecture, such as the Dimensity 9000 SoCs, and all reasonably similar products. As explained in Plaintiff's Complaint, Defendant infringes Claim 1 of the '919 Patent directly (including through making, using, selling, offering to sell, and importing into the United States the '919 Patent Accused Products) and by inducing consumers to use the '919 Patent Accused Products within the United States in the ordinary, customary, and intended way by, directly or through intermediaries, supplying the '919 Patent Accused Products to consumers within the United States and instructing and encouraging such customers to use the '919 Patent Accused Products in the ordinary, customary, and intended way.

Plaintiff's investigation to date indicates that SoCs or application processors based on or derived from ARMv8.2 architecture, as well as subsequent revisions to the ARM architecture such as the ARMv9 architecture include the devices identified below. On information and belief, Defendant makes, uses, sells, offers to sell, and/or imports into the United States (and induces customers and consumers to make, use, sell, offer to sell, or import into the United States) further electronic devices containing SoCs or microprocessors based on or derived from ARMv8.2 architecture, as well as subsequent revisions to the ARM architecture such as the ARMv9 architecture, in addition to those chips identified in **Table 8** below.

Accused Product	Model No.	Architecture	ARM ISA
Dimensity 700	MT6833	2x Cortex-A76; 6x Cortex-A55	v8.2-A
Dimensity 800	MT6873	4x Cortex-A76; 4x Cortex-A55	v8.2-A
Dimensity 810	MT6833V	2x Cortex-A76; 6x Cortex-A55	v8.2-A
Dimensity 820	MT6875	4x Cortex-A76; 4x Cortex-A55	v8.2-A
Dimensity 900	MT6877	2x Cortex-A78; 6x Cortex-A55	v8.2-A
Dimensity 920	MT6877T	2x Cortex-A78; 6x Cortex-A55	v8.2-A
Dimensity 930	MT6855	2x Cortex-A78; 6x Cortex-A55	v8.2-A
Dimensity 1000	MT6889Z	4x Cortex-A77; 4x Cortex-A55	v8.2-A
Dimensity 1000C	MT6883Z	4x Cortex-A77; 4x Cortex-A55	v8.2-A
Dimensity 1050	MT6879	2x Cortex-A78; 6x Cortex-A55	v8.2-A
Dimensity 1080	MT6877V	2x Cortex-A78; 6x Cortex-A55	v8.2-A
Dimensity 1100	MT6891Z	4x Cortex-A78; 4x Cortex-A55	v8.2-A
Dimensity 1200	MT6893	1x Cortex-A78; 3x Cortex-A78; 4x Cortex-A55	v8.2-A
Dimensity 1300	MT6893Z	1x Cortex-A78; 3x Cortex-A78; 4x Cortex-A55	v8.2-A
Dimensity 6020	MT6833	2x Cortex-A76; 6x Cortex-A55	v8.2-A
Dimensity 6080	MT6833	2x Cortex-A76; 6x Cortex-A55	v8.2-A
Dimensity 6100+	MT6835	2x Cortex-A76; 6x Cortex-A55	v8.2-A
Dimensity 6300	MT6835T	2x Cortex-A76; 6x Cortex-A55	v8.2-A
Dimensity 7020	MT6855	2x Cortex-A78; 6x Cortex-A55	v8.2-A
Dimensity 7025	MT6855	2x Cortex-A78; 6x Cortex-A55	v8.2-A
Dimensity 7030	MT8775	2x Cortex-A78; 6x Cortex-A55	v8.2-A
Dimensity 7050	MT6877	2x Cortex-A78; 6x Cortex-A55	v8.2-A
Dimensity 7200	MT6886	2x Cortex-A715; 6x Cortex-A510	v9-A
Dimensity 7200 Pro	MT6886	2x Cortex-A715; 6x Cortex-A510	v9-A
Dimensity 7300/7300X	MT6878	4x Cortex-A78; 4x Cortex-A55	v8.2-A
Dimensity 7350		2x Cortex-A715; 6x Cortex-A510	v9-A
Dimensity 7350 Pro		2x Cortex-A715; 6x Cortex-A510	v9-A

Accused Product	Model No.	Architecture	ARM ISA
Dimensity 8000	MT6895	4x Cortex-A78; 4x Cortex-A55	v8.2-A
Dimensity 8020	MT6891	4x Cortex-A78; 4x Cortex-A55	v8.2-A
Dimensity 8050	MT6893	1x Cortex-A78; 3x Cortex-A78; 4x Cortex-A55	v8.2-A
Dimensity 8100	MT6895Z	4x Cortex-A78; 4x Cortex-A55	v8.2-A
Dimensity 8200	MT6896Z	1x Cortex-A78; 3x Cortex-A78; 4x Cortex-A55	v8.2-A
Dimensity 8200-Ultra		1x Cortex-A78; 3x Cortex-A78; 4x Cortex-A55	v8.2-A
Dimensity 8250		1x Cortex-A78; 3x Cortex-A78; 4x Cortex-A55	v8.2-A
Dimensity 8300	MT6897	1x Cortex-A715; 3x Cortex-A715; 4x Cortex-A510	v9-A
Dimensity 9000	MT6983	1x Cortex-X2; 3x Cortex-A710; 4x Cortex-A510	v9-A
Dimensity 9000+	MT6983	1x Cortex-X2; 3x Cortex-A710; 4x Cortex-A510	v9-A
Dimensity 9200	MT6985	1x Cortex-X3; 3x Cortex-A715; 4x Cortex-A510	v9-A
Dimensity 9200+	MT6985	1x Cortex-X3; 3x Cortex-A715; 4x Cortex-A510	v9-A
Dimensity 9300	MT6989	1x Cortex-X4; 3x Cortex-X4; 4x Cortex-A720	v9.2-A
Dimensity 9300+	MT6989	1x Cortex-X4; 3x Cortex-X4; 4x Cortex-A720	v9.2-A
Dimensity 9400	MT6991	1x Cortex-X5; 3x Cortex-X4; 4x Cortex-A720	v9.2-A
Helio G70	MT6769V	2x Cortex-A75; 6x Cortex-A55	v8.2-A
Helio G80	MT6769T	2x Cortex-A75; 6x Cortex-A55	v8.2-A
Helio G85	MT6769Z	2x Cortex-A75; 6x Cortex-A55	v8.2-A
Helio G88	MT6769H	2x Cortex-A75; 6x Cortex-A55	v8.2-A
Helio G90/G90T	MT6785V	2x Cortex-A76; 6x Cortex-A55	v8.2-A
Helio G95	MT6785V	2x Cortex-A76; 6x Cortex-A55	v8.2-A
Helio G96	MT6781	2x Cortex-A76; 6x Cortex-A55	v8.2-A
Helio G99	MT6789	2x Cortex-A76; 6x Cortex-A55	v8.2-A
Helio G100		2x Cortex-A76; 6x Cortex-A55	v8.2-A
Helio P65	MT6768	2x Cortex-A75; 6x Cortex-A55	v8.2-A
Helio P90	MT6779V	2x Cortex-A75; 6x Cortex-A55	v8.2-A
Helio P95	MT6779V	2x Cortex-A75; 6x Cortex-A55	v8.2-A
Kompanio 520	MT8186	2x Cortex-A76; 6x Cortex-A55	v8.2-A
Kompanio 528	MT8186T	2x Cortex-A76; 6x Cortex-A55	v8.2-A
Kompanio 800/800T	MT8771	2x Cortex-A76; 6x Cortex-A55	v8.2-A
Kompanio 820	MT8192	2x Cortex-A76; 6x Cortex-A55	v8.2-A
Kompanio 828		2x Cortex-A76; 6x Cortex-A55	v8.2-A
Kompanio 838	MT8188	2x Cortex-A78; 6x Cortex-A55	v8.2-A
Kompanio 900T	MT8791	2x Cortex-A78; 6x Cortex-A55	v8.2-A
Kompanio 1200	MT8195	4x Cortex-A78; 4x Cortex-A55	v8.2-A
Kompanio 1300T	MT8797	4x Cortex-A78; 4x Cortex-A55	v8.2-A
Kompanio 1380	MT8195T	4x Cortex-A78; 4x Cortex-A55	v8.2-A
Pentonic 2000	MT9902/ MT9982	4x Cortex-A76	v8.2-A
MT9685		4x Cortex-A55	v8.2-A
MT9638		4x Cortex-A55	v8.2-A

Accused Product	Model No.	Architecture	ARM ISA
MT9612		4x Cortex-A55	v8.2-A
Genio 1200	MT8395	4x Cortex-A78; 4x Cortex-A55	v8.2-A
Genio 700	MT8390	2x Cortex-A78; 6x Cortex-A55	v8.2-A
Genio 510	MT8370	2x Cortex-A78; 4x Cortex-A55	v8.2-A
MT8675	MT8675	4x Cortex-A76; 4x Cortex-A55	v8.2-A
MT2713	MT2713		
MT2715	MT2715	4x Cortex-A78; 4x Cortex-A55	v8.2-A
MT2718	MT2718		
MT8678	MT8678		
Cockpit C-X1			
Cockpit C-Y1			
Cockpit C-M1			
Cockpit C-V1			
T830	MT6990	4x Cortex-A55	v8.2-A
T800	MT6980	4x Cortex-A55	v8.2-A
T750	MT6890	4x Cortex-A55	v8.2-A

Table 8

Claim 3: See Claim 1, above, which is incorporated by reference as if set forth in full.

Claim 4: See Claim 1, above, which is incorporated by reference as if set forth in full.

Claim 10: See Claim 1, above, which is incorporated by reference as if set forth in full.

Claim 11: See Claim 1, above, which is incorporated by reference as if set forth in full.

Claim 12: See Claim 1, above, which is incorporated by reference as if set forth in full.

Claim 16: For Claim 16, the ’919 Patent Accused Products, identified in Table 8 above, perform the method of Claim 16. Defendant infringes Claim 16 of the ’919 Patent directly by using the ’919 Patent Accused Products and by inducing customers and consumers to directly infringe Claim 16 of the ’919 Patent.

Claim 17: See Claim 16, above, which is incorporated by reference as if set forth in full.

Claim 18: See Claim 16, above, which is incorporated by reference as if set forth in full.

Claim 19: See Claim 16, above, which is incorporated by reference as if set forth in full.

Claim 20: See Claim 16, above, which is incorporated by reference as if set forth in full.

Claim 21: For Claim 21, the '919 Patent Accused Products, identified in Table 8 above, are a machine as described in Claim 21. As with Claim 1, Defendant infringes Claim 21 of the '960 Patent directly (including through making, using, selling, offering to sell, and importing into the United States) and by inducing customers and consumers to directly infringe Claim 21 of the '960 Patent.

Patent Local Rule 3-1(c): "A chart identifying specifically where each element of each asserted claim is found within each Accused Instrumentality, including for each element that such party contends is governed by 35 U.S.C. § 112 (¶ 6), the identity of the structure(s), act(s), or material(s) in the Accused Instrumentality that performs the claimed function"

Disclosure: See Exhibit H for the '919 Patent Accused Products.

Patent Local Rule 3-1(d): "Whether each element of each asserted claim is claimed to be literally present or present under the doctrine of equivalents in the Accused Instrumentality"

Disclosure: Plaintiff contends that each element of each asserted claim is "literally" infringed in the '919 Patent Accused Products pursuant to Federal Circuit precedent.

In the alternative, and in accordance with Federal Circuit and Supreme Court precedent, Plaintiff further contends that each of the '919 Patent Accused Products for Claims the '919 Asserted Claims comprise structures that are identical or equivalent to the structures disclosed in the '919 Patent.

The '919 Patent Accused Products for the '919 Asserted Claims comprise structures that perform the same function, the same way, to reach the same result, as the structures disclosed in the '919 Patent. Specifically, the structures disclosed in the '919 Patent Accused Products perform the same function, the same way, to reach the same result as the corresponding structures in the '919 Patent. For the same or similar reasons, any differences between such structures in the Accused Instrumentalities and such structures disclosed in the '919 Patent are insubstantial.

Patent Local Rule 3-1(e): "For any patent that claims priority to an earlier application, the priority date to which each asserted claim allegedly is entitled."

Disclosure: Plaintiff contends that the asserted claims are each entitled to a priority date of no later than December 12, 2012, the filing date of the earliest of the applications to which the '919 Patent claims priority.

Patent Local Rule 3-1(f): "If a party claiming patent infringement wishes to preserve the right to rely, for any purpose, on the assertion that its own apparatus, product, device, process, method, act, or other instrumentality practices the claimed invention, the party must identify, separately for each asserted claim, each such apparatus, product, device, process, method, act, or other instrumentality that incorporates or reflects that particular claim."

Disclosure: Not applicable.

Patent Local Rule 3-2(a): "Documents (e.g., contracts, purchase orders, invoices, advertisements, marketing materials, offer letters, beta site testing agreements, and third party or 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. A party's production of a document as required herein shall not constitute an admission that such document evidences or is prior art under 35 U.S.C. §102"

Disclosure: No such documents are in Plaintiff's possession, custody, or control.

Patent Local Rule 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. R. 3-1(e), whichever is earlier"

Disclosure: See invention disclosure statement INTEL0000116-123 produced herewith. Any redaction in this document was made by third-party Intel Corp., not Plaintiff.

Patent Local Rule 3-2(c): "A copy of the file history for each patent in suit."

Disclosure: See DPRIME-MTEK0002115-DPRIME-MTEK0002386, produced herewith.

Dated: September 4, 2024

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