

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

AFL TELECOMMUNICATIONS
LLC,

Plaintiff,

v.

STERLITE TECH HOLDING, INC.,

Defendant.

C.A. No. 1:23-cv-01202-RGA

**PLAINTIFF AFL TELECOMMUNICATIONS LLC'S
DISCLOSURE OF INITIAL INFRINGEMENT CONTENTIONS**

Pursuant to Court's Scheduling Order of March 20, 2024, Plaintiff AFL Telecommunications ("Plaintiff" or "AFL") provides the following disclosure of initial infringement contentions to Defendant Sterlite Tech Holding, Inc. ("Sterlite"). AFL does so while reserving a right to amend, if necessary, as discovery is ongoing and technical documentation and other requested information relevant to this case have not been produced by Defendant.

AFL contends Sterlite has infringed, continues to infringe, and/or will infringe claims 1-6 and 8 of U.S. Patent No. 11,287,591 ("Asserted Claims") by making, using, selling, offering to sell, and/or importing the following products: Celesta Intelligently Bonded Ribbon optical fiber cables having fiber counts between 96F-576F and specifically including such cables with fiber counts of 96, 144, 288, 432, and 576, as well any other Sterlite product substantially similar in all material respects to these products ("Accused Products"). AFL reserves the right to supplement

this disclosure should further evidence emerge during discovery.

Attached as Exhibit 1, AFL provides claim charts identifying where each limitation of each Asserted Claim is found in Sterlite's Accused Products. The claim charts include citations to web pages and videos, all of which are found on Defendant's website and which are within the possession, custody, or control of Defendant and have not yet been produced in this litigation. AFL reserves the right to supplement these infringement contentions as additional information becomes available throughout the discovery period, in light of any order on claim construction, or as otherwise permitted by the Court or agreed upon by the parties.

Dated: June 24, 2024

/s/ /Scott A. Cole/

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CERTIFICATE OF SERVICE

I, Scott Cole, hereby certify that on June 24, 2024, a true and correct copy of the foregoing document was caused to be served via First Class Mail on the following attorneys of record:

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Dated: June 24, 2024

Respectfully submitted,

DORITY & MANNING, P.A.

By: /s/ Scott Cole
Scott Cole