

**UNITED STATES INTERNATIONAL TRADE COMMISSION
WASHINGTON, D.C.**

**Before the Honorable Monica Bhattacharyya
Administrative Law Judge**

In The Matter Of

**CERTAIN HIGH-STRENGTH
ALUMINUM OR ALUMINUM ALLOY-
COATED STEEL, AND AUTOMOTIVE
PRODUCTS AND AUTOMOBILES
CONTAINING SAME**

Inv. No. 337-TA-1402

JOINT TECHNOLOGY STIPULATION

Pursuant to the Procedural Schedule and Ground Rule 6.4, Complainant ArcelorMittal S.A. (“ArcelorMittal” or “Complainant”) and Respondents VinFast Auto Ltd., VinFast Auto, LLC, VinFast USA Distribution, LLC, Vingroup USA, LLC, and VinFast Trading and Production JSC (“VinFast” or “Respondents”) hereby jointly submit this Technology Stipulation concerning the technology described in U.S. Patent Nos. 10,961,602 (“the ’602 Patent”) and 11,326,227 (“the ’227 Patent”) (collectively, the “Asserted Patents”).

This stipulation is meant to inform the ALJ of the technology at issue in this investigation. Nothing contained herein shall be deemed as an admission by any party as to the merits of any legal issue, including whether any element is found in an accused product or the prior art or what the construction of any claim limitation should be.

I. OVERVIEW

The technology relevant to this investigation relates to high-strength aluminum or aluminum alloy-coated steel for use in automobiles, and automobiles and automotive products containing said high-strength aluminum or aluminum alloy-coated steel.

The manufacturing process begins with the manufacturing of steel sheets. The steel sheets are then hot dipped into an aluminum or aluminum-alloy bath, which results in aluminum or aluminum-alloy coated steel, which is produced and shipped in coils.

The coils are next “hot stamped,” a process in which the steel from the coils is heated and press-hardened through die quenching. Specifically, the aluminum or aluminum-alloy coated steel coil is fed into a press and die where a blank in the desired shape is punched out from the large metal sheet. The blank is then loaded into an oven or furnace to be heated. Next, the heated blank is transferred to a hot stamping press which presses and cools the piece. Finally, the hot-stamped part is unloaded from the press for finishing.

These hot-stamped parts may form various components of an automobile, such as the frame, which includes, for example, door rings, front and rear bumper beams, door reinforcements, windscreen pillar reinforcements, A- and B-pillars, roof rails, and dash panel crossmembers. These hot-stamped parts are then assembled into automobiles.

II. THE ASSERTED PATENTS

The '602 and '227 Patents are titled “Coated Steel Strips, Coated Stamped Products and Methods.” The patents generally describe a steel product including a strip of base steel and an aluminum or aluminum-alloy coating with a certain thickness and certain other characteristics. The claimed characteristics may result from a hot-stamping process.

The '602 Patent issued on March 30, 2021 and claims priority to an application filed on October 30, 2006. The '602 Patent has a total of 30 claims. Complainant asserts claims 1, 2, 3, 5, 6, 7, 8, 9, 10, 12, 20, 21, 22, 24, 25, 26, and 28 for infringement. Complainant asserts claims 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 18, 20, 21, 22, 24, and 26 as claims practiced by the Domestic Industry Products. Claims 1, 21, and 24 are independent claims.

The '227 Patent issued on May 10, 2022 and claims priority to an application filed on October 30, 2006. The '227 Patent has a total of 25 claims. Complainant asserts claims 1, 2, 4, 5, 6, 7, 8, 9, 10, 11, 13, 15, 16, 17, 22, 24, and 25 for infringement. Complainant asserts claims 1, 2, 4, 5, 7, 9, 10, 13, 15, 16, 17, 24, and 25 as claims practiced by the Domestic Industry Products. Claim 1 is the only independent claim.

Dated: November 1, 2024

Respectfully submitted,

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CERTIFICATE OF SERVICE

I, Michael Delaney, certify that on November 1, 2024, a copy of the **JOINT TECHNOLOGY STIPULATION** was served, pursuant to Commission regulations, on the following interested parties in the manner so indicated:

The Honorable Monica Bhattacharyya Administrative Law Judge U.S. International Trade Commission 500 E Street, S.W. Washington, DC 20436	<i>Via E-mail:</i> <i>Bhattacharyya337@usitc.gov</i>
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