

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

NINGDE AMPEREX TECHNOLOGY,
LIMITED

Plaintiff,

v.

ZHUHAI COSMX BATTERY CO., LTD.,

Defendant.

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Civil Case No. 2:24-cv-728-JRG

DEFENDANT'S INITIAL P.R. 3-3 AND 3-4 DISCLOSURES

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Product	Company	Available at Least By	Short Title
Samsung S9+	Samsung	June 20, 2018	S9+ Cell/Separator

4. The '498 Patent

a. Prior Art Patents and Published Patent Applications

Patent No.	Country of Origin	Issue/Publication Date	Short Title
U.S. Patent Appl. Pub. No. 2011/0111276 to Sato <i>et al.</i>	United States	May 12, 2011	Sato
Japan Patent Appl. Pub. No. 2000/067907 to Takemura <i>et al.</i>	Japan	March 3, 2000	Takemura
Japan Patent Appl. Pub. No. 2003/068271 to Nakamura <i>et al.</i>	Japan	March 7, 2003	Nakamura
Japan Patent Appl. Pub. No. 2010/055906 to Kobayashi <i>et al.</i>	Japan	March 11, 2010	Kobayashi
U.S. Patent Appl. Pub. No. 2011/010539 to Oh <i>et al.</i>	United States	May 5, 2011	Oh-539
U.S. Patent Appl. Pub. No. 2010/0035144 to Oh <i>et al.</i>	United States	February 11, 2010	Oh-144
U.S. Patent Appl. Pub. No. 2004/0096735 to Komatsu <i>et al.</i>	United States	May 20, 2004	Komatsu
U.S. Patent Appl. Pub. No. 2007/0172736 to Fujikawa <i>et al.</i>	United States	July 26, 2007	Fujikawa

b. Prior Art Products

Product	Company	Available at Least By	Short Title
CA3952A4 Cell/Electrode	China	August 1, 2013	CA3952A4 Cell/Electrode

5. The '118 Patent

a. Prior Art Patents and Published Patent Applications

Patent No.	Country of Origin	Issue/Publication Date	Short Title
JP 2013-211096	Japan	October 10, 2013	Ishigaki
2017/0256776 A1	U.S.	September 7, 2017	Saka
CN 202905885 U	China	April 24, 2013	Li
2011/0168550 A1	U.S.	July 14, 2011	Wang
2016/0013480 A1	U.S.	January 14, 2016	Sikha
2013/0302685 A1	U.S.	November 14, 2013	Kim

b. Prior Art Non-Patent Publications

Title	Author/ Publisher	Publication Date	Short Title

c. Prior Art Products

Product	Company	Available at Least By	Short Title
CA245065HV Cell/Electrode	CosMX	October 7, 2014	CA245065HV Cell/Electrode
CA3270C4G Cell/Electrode	CosMX	September 1, 2017	CA3270C4G Cell/Electrode
CA3952A4 Cell/Electrode	CosMX	June 28, 2013	CA3952A4 Cell/Electrode
ATL 265066 Cell/Electrode	ATL	January 2017	ATL 265066 Cell/Electrode

Ex. No.	Ground
148-36	CA245065HV Cell/Separator and Akiike
148-37	CA245065HV Cell/Separator and Honda
148-38	CA245065HV Cell/Separator and Tanaka
148-39	CA3952A4 Cell/Separator
148-40	CA3952A4 Cell/Separator and Murakami
148-41	CA3952A4 Cell/Separator and Beard
148-42	CA3952A4 Cell/Separator and Akiike
148-43	CA3952A4 Cell/Separator and Honda
148-44	CA3952A4 Cell/Separator and Tanaka
148-45	ATL 265066 Cell/Separator
148-46	ATL 265066 Cell/Separator and Murakami
148-47	ATL 265066 Cell/Separator and Beard
148-48	ATL 265066 Cell/Separator and Akiike
148-49	ATL 265066 Cell/Separator and Honda
148-50	ATL 265066 Cell/Separator and Tanaka
148-51	S9+ Cell/Separator
148-52	S9+ Cell/Separator and Murakami
148-53	S9+ Cell/Separator and Beard
148-54	S9+ Cell/Separator and Akiike
148-55	S9+ Cell/Separator and Honda
148-56	S9+ Cell/Separator and Tanaka

d. The '498 Patent (Appendix 498)

Ex. No.	Ground
498-01	CA3952A4, Komatsu
498-02	CA3952A4, Komatsu, Nakamura
498-03	CA3952A4, Komatsu, Oh-144
498-04	CA3952A4, Komatsu, Sato
498-05	CA3952A4, Sato, Fujikawa
498-06	CA3952A4, Sato, Oh-539
498-07	CA3952A4, Sato, Nakamura

Ex. No.	Ground
498-08	CA3952A4, Sato, Oh-144
498-09	CA3952A4, Takemura, Fujikawa
498-10	CA3952A4, Takemura, Nakamura
498-11	CA3952A4, Takemura, Oh-144
498-12	Sato, Komatsu
498-13	Sato, Takemura
498-14	Sato, Takemura, Fujikawa
498-15	Sato, Takemura, Kobayashi
498-16	Sato, Takemura, Kobayashi, Oh-539, Oh-144
498-17	Sato, Takemura, Nakamura
498-18	Sato, Takemura, Oh-539, Oh-144
498-19	Takemura, Oh-539, Kobayashi
498-20	Takemura, Oh-539, Kobayashi, Oh-144

e. The '118 Patent (Appendix 118)

Ex. No.	Ground
118-01	Ishigaki
118-02	Ishigaki and Kim
118-03	Ishigaki and Li
118-04	Ishigaki and Saka
118-05	Sikha and Ishigaki
118-06	Sikha and Kim
118-07	Sikha and Li
118-08	Sikha and Saka
118-09	Wang and Ishigaki
118-10	Wang and Kim
118-11	Wang and Li
118-12	Wang and Saka
118-13	CA245065HV Cell/Electrode and Ishigaki
118-14	CA245065HV Cell/Electrode and Wang
118-15	CA3270C4G Cell/Electrode and Ishigaki