

EXHIBIT N

Infringement of U.S. Patent No. 11,721,714

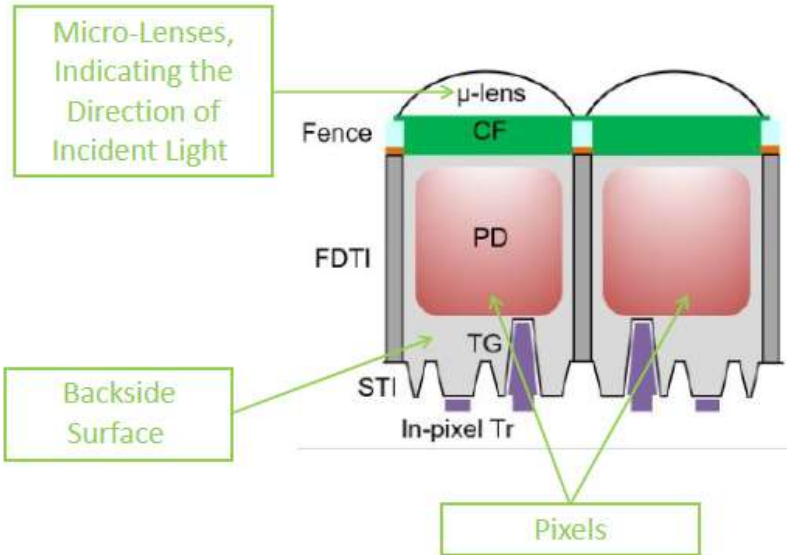
ISOCELL HP2 Image Sensor
Samsung Galaxy S23 Ultra



U.S. Patent No. 11,721,714
Claim 1: A light trapping device, comprising:

Claim 1	
A light trapping device, comprising:	The Samsung Galaxy S23 Ultra is a light trapping device at least because it includes a Samsung ISOCELL sensor. In particular, the Samsung Galaxy S23 Ultra includes an ISOCELL HP2 sensor. The ISOCELL HP2 is a 200-megapixel image sensor for ultra-high resolution photos. <i>See, e.g.,</i> D-VGT Technology of ISOCELL Image Sensor, Samsung Electronics Corp., June 30, 2023, available at https://semiconductor.samsung.com/news-events/tech-blog/d-vtg-technology-of-isocell-image-sensor/ (last visited March 7, 2024).  Samsung Galaxy S23 Ultra, Samsung Electronics Corp.

Claim 1(a): at least one light sensitive pixel having a light incident surface, a backside surface opposite the light incident surface, and a peripheral sidewall disposed into at least a portion of the pixel and extending at least substantially around the pixel periphery;

Claim 1(a)	
at least one light sensitive pixel having a light incident surface, a backside surface opposite the light incident surface, and a peripheral sidewall disposed into at least a portion of the pixel and extending at least substantially around the pixel periphery;	The ISOCELL HP2 sensor from the Samsung Galaxy S23 Ultra includes at least one light sensitive pixel having a light incident surface, a backside surface opposite the light incident surface, and a peripheral sidewall disposed into at least a portion of the pixel and extending at least substantially around the pixel periphery. The below illustration from Samsung shows that the ISOCELL HP2 includes at least one light sensitive pixel having a light incident surface and a backside surface. Figure 5.8.1 IEEE 359 1(a)  <i>See, e.g., Sungbong Park, et al., A 64Mpixel CMOS Image Sensor with 0.56μm Unit Pixels Separated by Front Deep-Trench Isolation, 2022 IEEE International Solid-State Circuits Conference, March 17, 2022.</i>

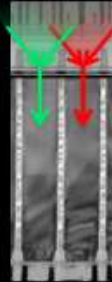
U.S. Patent No. 11,721,714

Claim 1(a): at least one light sensitive pixel having a light incident surface, a backside surface opposite the light incident surface, and a peripheral sidewall disposed into at least a portion of the pixel and extending at least substantially around the pixel periphery;

Claim 1(a)	
	See, e.g., D-VGT Technology of ISOCELL Image Sensor, Samsung Electronics Corp., June 30, 2023, available at https://semiconductor.samsung.com/news-events/tech-blog/d-vtg-technology-of-isocell-image-sensor/ (last visited March 8, 2024).

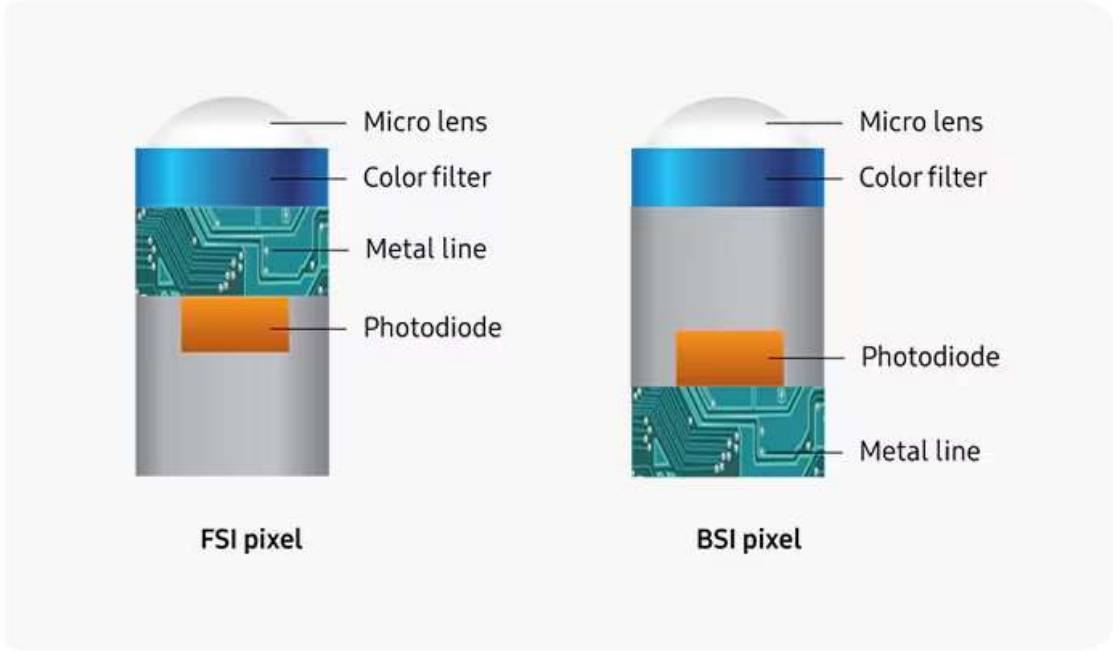
U.S. Patent No. 11,721,714

Claim 1(a): at least one light sensitive pixel having a light incident surface, a backside surface opposite the light incident surface, and a peripheral sidewall disposed into at least a portion of the pixel and extending at least substantially around the pixel periphery;

Claim 1(a)	
	Evolution of Pixel Structures Overcome the physical pixel limitation with industry's no.1 semiconductor process tech BS  2011  ISOCELL(FDTI) Pixel isolation  2015  ISOCELL 2.0 Color filter isolation  2019 2021  Nano-photonics Color Routing  2024 https://semiconductor.samsung.com/news-events/tech-blog/how-isocell-unlock-the-future-of-camera-experiences/

U.S. Patent No. 11,721,714

Claim 1(b): a backside light trapping material at least partially covering the backside surface; and

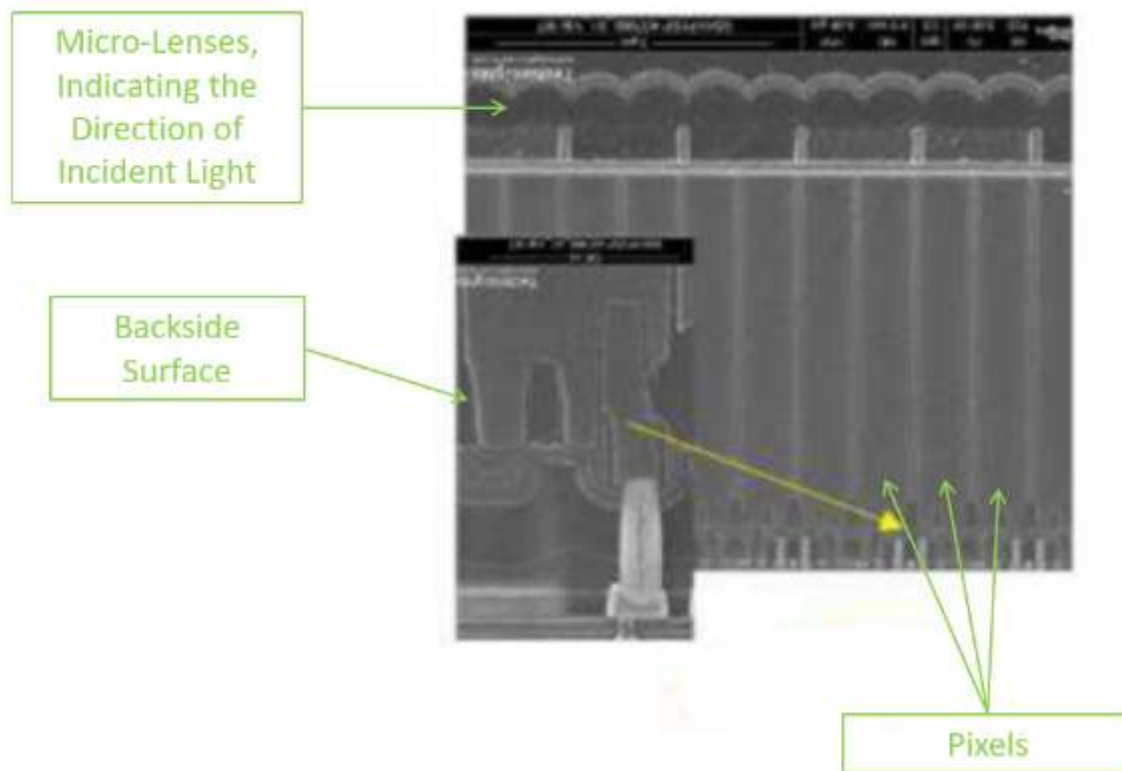
Claim 1(b)	
a backside light trapping material at least partially covering the backside surface; and	The ISOCELL HP2 sensor includes a backside light trapping material at least partially covering the backside surface. The ISOCELL HP2 is a stacked backside illuminated image sensor, showing the presence of a backside light trapping material. <i>See, e.g.,</i> Sungbong Park, <i>et al.</i>, <i>A 64Mpixel CMOS Image Sensor with 0.56μm Unit Pixels Separated by Front Deep-Trench Isolation</i>, 2022 IEEE International Solid-State Circuits Conference, March 17, 2022.  The diagram illustrates the structural differences between a Front Side Illuminated (FSI) pixel and a Back Side Illuminated (BSI) pixel. The FSI pixel structure, from top to bottom, consists of a Micro lens, a Color filter, a Metal line, and a Photodiode. The BSI pixel structure, from top to bottom, consists of a Micro lens, a Color filter, a Photodiode, and a Metal line. A light trapping material (gray) is shown above the photodiode in the BSI pixel structure. https://semiconductor.samsung.com/news-events/tech-blog/isocell-plus-leading-the-next-generation-of-image-sensors/

U.S. Patent No. 11,721,714

Claim 1(b): a backside light trapping material at least partially covering the backside surface; and

Claim 1(b)

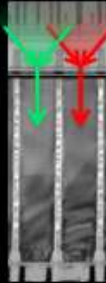
The below image shows the backside light trapping material for the ISOCELL HP2 in the Samsung Galaxy S23 Ultra.



Scott-Thomas, John, “*Trends and Developments in State-of-the-Art CMOS Image Sensors*”, TechInsight Inc., (undated) (“Samsung’s most recent 200 MP sensor, the HP2 found in the Galaxy S23 Ultra, also uses a Dual Vertical Gate”) (citing Jungbin Yun, *et al.*, “*A 0.6 μm Small Pixel for High Resolution CMOS Image Sensor with Full Well Capacity of 10,000e- by Dual Vertical Transfer Gate Technology*”, Samsung Electronics, Symposium on VLSI Technology & Circuits Digest of Technical Papers, 2022, pp.351–352.)

U.S. Patent No. 11,721,714

Claim 1(c): a peripheral light trapping material substantially covering the peripheral sidewall;

Claim 1(c)	
a peripheral light trapping material substantially covering the peripheral sidewall;	The ISOCELL HP2 sensor includes a peripheral light trapping material substantially covering the peripheral sidewall. The peripheral light trapping material in the ISOCELL HP2 is shown below: Evolution of Pixel Structures Overcome the physical pixel limitation with industry's no.1 semiconductor process tech BS  2011  ISOCELL(FDTI) Pixel isolation  2015  ISOCELL 2.0 Color filter isolation  2019  Nano-photonics Color Routing  2024 https://semiconductor.samsung.com/news-events/tech-blog/how-isocell-unlock-the-future-of-camera-experiences/

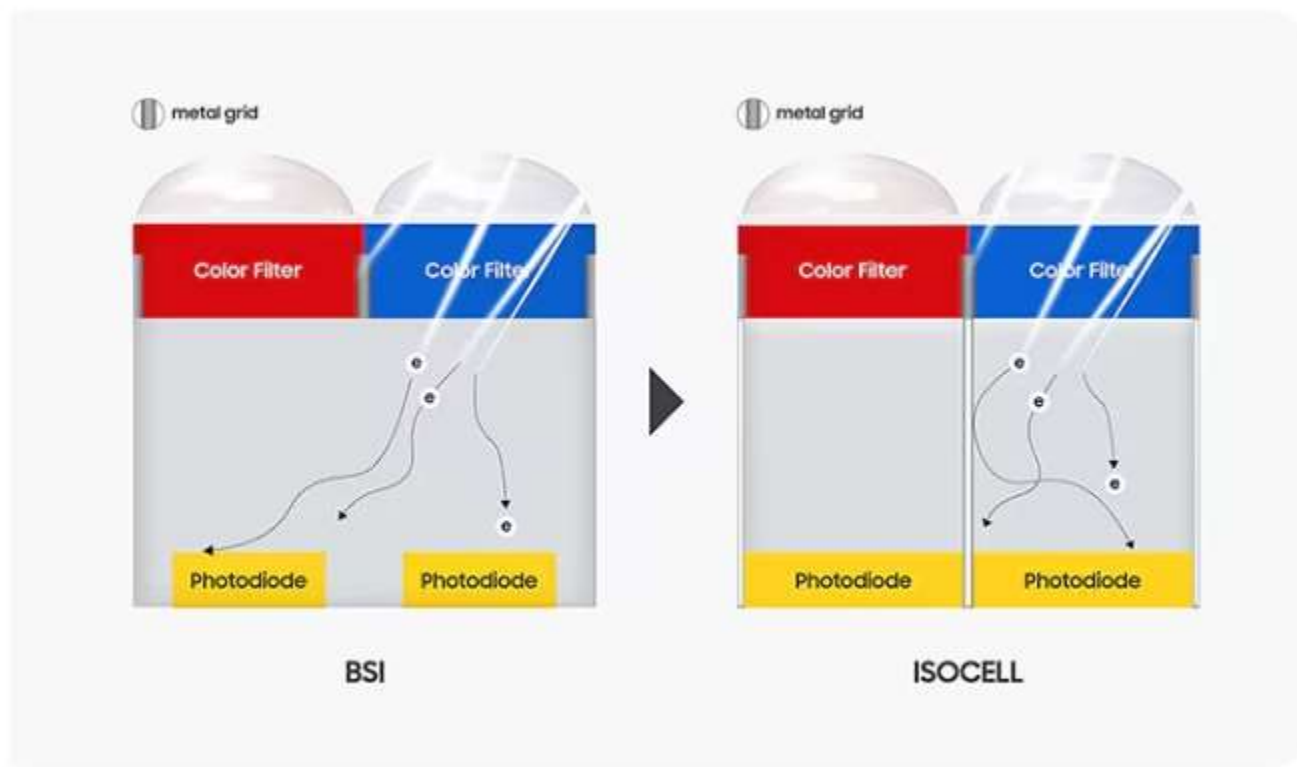
Claim 1(d): wherein light contacting the backside light trapping material or the peripheral light trapping material is reflected back toward the pixel;

Claim 1(d)

wherein light contacting the backside light trapping material or the peripheral light trapping material is reflected back toward the pixel;

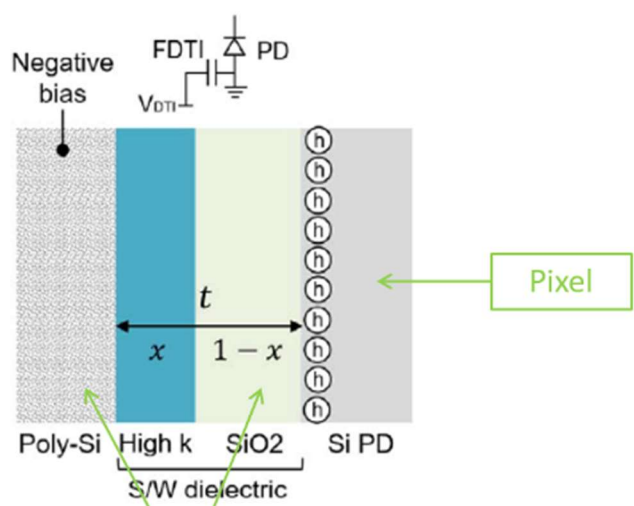
The ISOCELL HP2 sensor includes a backside light trapping material and a peripheral light trapping material, wherein light contacting the backside light trapping material or the peripheral light trapping material is reflected back toward the pixel.

As shown below, light contacting the peripheral light trapping material will be reflected back toward the pixel in Samsung's ISOCELL devices.



ISOCELL Plus: Leading the next generation of image sensors, Samsung Corp., <https://semiconductor.samsung.com/news-events/tech-blog/isocell-plus-leading-the-next-generation-of-image-sensors/> (last visited March 5, 2024)

Claim 1(e): wherein at least one of the backside light trapping material or the peripheral light trapping material includes a high refractive index material sandwiched between two low refractive index materials.

Claim 1(e)	
wherein at least one of the backside light trapping material or the peripheral light trapping material includes a high refractive index material sandwiched between two low refractive index materials.	The ISOCELL HP2 sensor includes a backside light trapping material and a peripheral light trapping material, wherein at least one of the backside light trapping material or the peripheral light trapping material includes a high refractive index material sandwiched between two low refractive index materials. The ISOCELL HP2 includes 200-megapixels with peripheral light trapping material including, for example, polysilicon sandwiched between a High k dielectric and SiO₂.  <i>See, e.g., Sungbong Park, et al., A 64Mpixel CMOS Image Sensor with 0.56μm Unit Pixels Separated by Front Deep-Trench Isolation, 2022 IEEE International Solid-State Circuits Conference, March 17, 2022.</i>

U.S. Patent No. 11,721,714

Claim 1(e): wherein at least one of the backside light trapping material or the peripheral light trapping material includes a high refractive index material sandwiched between two low refractive index materials.

Claim 1(e)

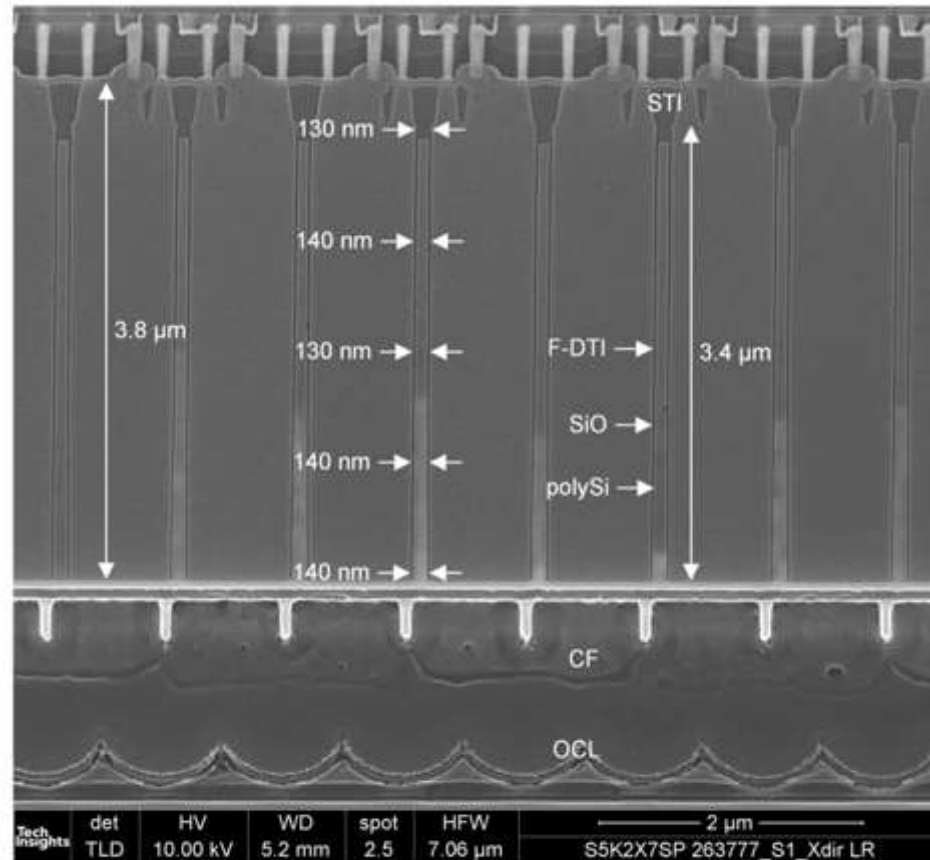


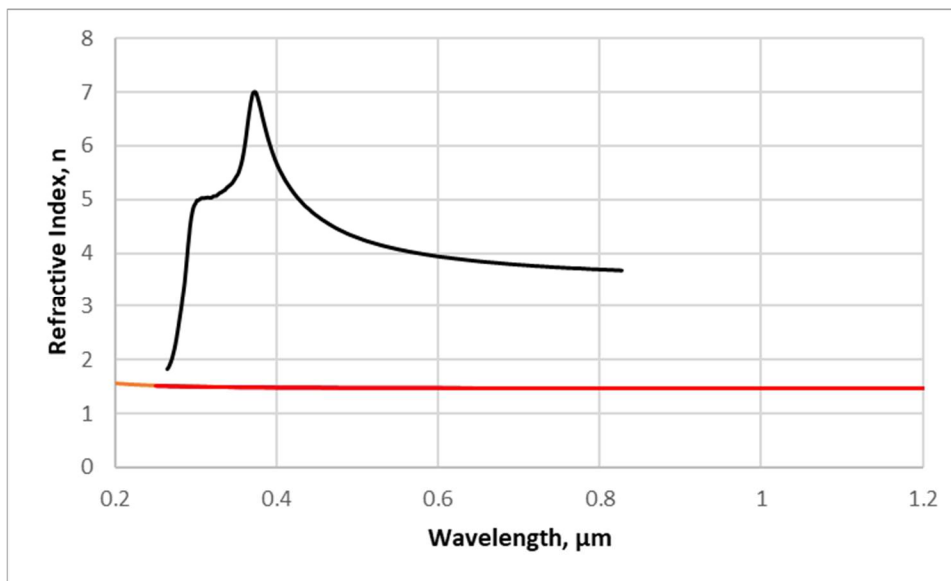
Figure 4–0.90μm pixel ISOCELL Gen 3 F-DTI–
SEM

<http://zhuanlan.zhihu.com/p/605284749>

Claim 1(e): wherein at least one of the backside light trapping material or the peripheral light trapping material includes a high refractive index material sandwiched between two low refractive index materials.

Claim 1(e)

As shown below, the index of refraction for polysilicon (black curve) is at least 0.2 greater than silicon dioxide (colored curves).



Compiled from RefractiveIndex.info (last visited March 8, 2024) (Polysilicon: <https://refractiveindex.info/?shelf=3d&book=crystals&page=silicon>; Silicon Dioxide: https://refractiveindex.info/?shelf=main&book=SiO2&page=Rodriguez-de_Marcos, <https://refractiveindex.info/?shelf=main&book=SiO2&page=Gao>, <https://refractiveindex.info/?shelf=main&book=SiO2&page=Lemarchand>) (last visited March 8, 2024).