

[REDACTED]
[REDACTED]
UNITED STATES INTERNATIONAL TRADE COMMISSION
Washington, DC

Before the Honorable Bryan F. Moore
Administrative Law Judge

In the Matter of

**CERTAIN SENSORS WITH PIXELS AND
PRODUCTS CONTAINING THE SAME**

Investigation No. 337-TA-1403

JOINT STATEMENT IDENTIFYING ACCUSED PRODUCTS

Pursuant to the Ground Rules and Amended Procedural Schedule, Complainant SiOnyx, LLC (“SiOnyx”) and Respondents Samsung Semiconductor, Inc., Samsung Electronics America, Inc., and Samsung Electronics, Co., Ltd. (collectively, “Samsung”), by and through their respective counsel, hereby provide the following joint statement identifying the accused products in this Investigation:

The subject articles in this Investigation are certain smartphones and tablet computers containing sensors with pixels.

The Accused Products consist of certain smartphones and tablet computers that contain the following sensors with pixels that SiOnyx contends infringe one or more claims of one or more of the Asserted Patents¹:

1. Samsung Front Side Deep Trench Isolation ISOCELL sensors, which consist of the following: [REDACTED]

[REDACTED], and [REDACTED]. These sensors are included in the following Samsung smartphones: A13, A14 5G, A15 5G, A16 5G, A23 5G, A25 5G,

¹ The Asserted Patents are U.S. Patent Nos. 9,064,764, 9,905,599, 10,224,359, 11,069,737, and 11,721,714.

[REDACTED]
[REDACTED]
A35 5G, S21 5G, S21 Ultra 5G, S21+ 5G, S22, S22 Ultra, S22+, S23, S23 FE, S23 Ultra, S23+, S24, S24 FE, S24 Ultra, S24+, S25, S25 Ultra, S25+, XCover Pro 2, XCover6 Pro, Z Flip6, Z Fold 4, Z Fold 6, and Z Fold5.

2. Samsung Backside Deep Trench Isolation ISOCELL sensors, which consist of the following: [REDACTED], and [REDACTED]. These sensors are included in the following Samsung smartphones and tablet computers: A35 5G, A54 5G, S21 Ultra 5G, S23 FE, S24 FE, Tab Active3, Tab Active4 Pro, Tab Active5, Z Flip5, and Z Flip6.

3. Sony IMX sensors, which consist of the following: [REDACTED]
[REDACTED],
and [REDACTED]. These sensors are included in the following Samsung smartphones and tablet computers: A25 5G, A35 5G, A54 5G, Tab S9 FE, Tab S9 FE+, S21 5G, S21 FE, S21 Ultra 5G, S21+ 5G, S22, S22 Ultra, S22+, S23, S23 Ultra, S23+, S24, S24 FE, S24 Ultra, S24+, S25, S25 Ultra, S25+, XCover Pro 2, XCover6 Pro, Z Flip5, Z Fold 4, Z Fold 6, and Z Fold5.

The Samsung Respondents do not agree that one image sensor model is representative of another image sensor model.²

² SiOnyx disagrees that this statement is appropriate for a joint statement regarding the list of accused products, and further disagrees on the merits of representativeness, which is not at issue in this filing.

[REDACTED]
[REDACTED]
Dated: January 24, 2025

Respectfully Submitted,

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United States International Trade Commission
Investigation No. 337-TA-1403
Certain Sensors with Pixels and Products Containing the Same

CERTIFICATE OF SERVICE

I, Jacob C. Alstadt, hereby certify that on January 24, 2025 a true and correct copy of the foregoing document was served upon the following parties as indicated below:

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I, Jacob Alstadt, hereby certify that on January 31, 2025 a true and correct copy foregoing document was served upon the following parties as indicated below:

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