UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

LONGITUDE LICENSING LTD., and MARLIN SEMICONDUCTOR LIMITED, *Plaintiffs*, v. APPLE INC., BROADCOM INC. and QUALCOMM INC., *Defendants*.	Case No. 1:25-cv-215-ADA

UNOPPOSED MOTION TO STAY ACTION PURSUANT TO 28 U.S.C. § 1659 PENDING PARALLEL ITC ACTION

Defendants Apple Inc., Broadcom Inc., and Qualcomm, Incorporated ("Defendants") respectfully move the Court, pursuant to 28 U.S.C. § 1659 and the Court's inherent powers, to stay this action until the final determination of the U.S. International Trade Commission ("ITC") in the co-pending matter titled *Certain Foreign-Fabricated Semiconductor Devices, Products Containing the Same, and Components Thereof*, Inv. No. 337-TA-1443 ("the ITC Matter"). Plaintiffs Longitude Licensing Ltd., and Marlin Semiconductor Limited's ("Plaintiffs") do not oppose Defendants' motion.

On February 13, 2025, Plaintiffs filed a complaint against Defendants in this action alleging infringement of U.S. Patent No. 7,745,847, U.S. Patent No. 9,093,473, U.S. Patent No. 9,147,747, U.S. Patent No. 9,184,292, and U.S. Patent No. 9,953,880. On February 14, 2025, Plaintiffs filed a complaint in the ITC asserting the same five patents against Defendants and other respondents. The ITC Matter was instituted on March 21, 2025. Ex. 1.

Pursuant to 28 U.S.C. § 1659, district court patent claims that involve the same issues as a parallel ITC proceeding are subject to a mandatory stay. Specifically, 28 U.S.C. § 1659(a) provides:

> **(a) Stay.** In a civil action involving parties that are also parties to a proceeding before the United States International Trade Commission under section 337 of the Tariff Act of 1930, at the request of a party to the civil action that is also a respondent in the proceeding before the Commission, the district court shall stay, until the determination of the Commission becomes final, proceedings in the civil action with respect to any claim that involves the same issues involved in the proceeding before the Commission, but only if such request is made within –
>
> **(1)** 30 days after the party is named as a respondent in the proceeding before the Commission, or
>
> **(2)** 30 days after the district court action is filed, whichever is later.

28 U.S.C. § 1659(a) (emphasis added). A stay issued under this statute remains in effect during any appeals and "until the Commission proceedings are no longer subject to judicial review." *In re Princo Corp.*, 478 F.3d 1345, 1355 (Fed. Cir. 2007). Here, because Plaintiffs assert the same five patents against Defendants in this action and the ITC Matter, the asserted claims involve the same issues, and the parties are the same, a stay of this case as to Defendants is mandatory upon timely request. The mandatory stay of Section 1659 applies where a request is made: (1) 30 days after the party is named as a respondent in the proceeding before the Commission; or (2) 30 days after the district court action is filed, whichever is later. Because Defendants are requesting a stay within 30 days of the institution of the ITC Matter on March 21, 2025, the parties' request is timely under § 1659(a).

For the foregoing reasons, Defendants respectfully request that the Court enter the attached proposed order and suspend all deadlines and stay all proceedings in this action until the determination of the ITC Matter becomes final, including during any appeals thereof.

Dated: April 10, 2025

Respectfully submitted,

/s/ Brian K. Erickson
John M. Guaragna
Texas Bar No 24043308
Brian K. Erickson
Texas Bar No. 24012594
DLA PIPER LLP (US)
303 Colorado, Suite 3000
Austin, TX 78701
Tel: 512.457.7059
Fax: 512.457.7001
brian.erickson@us.dlapiper.com

ATTORNEY FOR DEFENDANT APPLE INC.

/s/ Steve R. Borgman
Steve R. Borgman
Texas State Bar No. 02670300
Kilpatrick Townsend & Stockton LLP
700 Louisiana, Suite 4300
Houston, Texas 77002
sborgman@ktslaw.com
Phone: (281) 809-4081
Fax: (281) 990-6826

ATTORNEY FOR DEFENDANT BROADCOM INC.

/s/ Evan Pearson
Evan Pearson
State Bar No.: 24121403
Quinn Emanuel Urquhart & Sullivan LLP
300 West 6th Street, Suite 2010
Austin, TX 78701
Telephone: (737) 667-6100

Facsimile: (737) 667-6110
Email: evanpearson@quinnemanuel.com

ATTORNEY FOR QUALCOMM INC.

CERTIFICATE OF CONFERENCE

I hereby certify that counsel for Defendants conferred with Plaintiffs' counsel. Plaintiffs do not oppose Defendants' request sought in this motion.

/s/ Brian K. Erickson
Brian K. Erickson

CERTIFICATE OF SERVICE

I hereby certify that on April 10, 2025, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send notification of such filing via electronic mail to all counsel of record. Any other counsel of record will be served by first class U.S. mail.

/s/ Brian K. Erickson
Brian K. Erickson

EXHIBIT 1

UNITED STATES INTERNATIONAL TRADE COMMISSION
Washington, D.C.

In the Matter of **CERTAIN FOREIGN-FABRICATED SEMICONDUCTOR DEVICES, PRODUCTS CONTAINING THE SAME, AND COMPONENTS THEREOF**	**Inv. No. 337-TA-1443**

NOTICE OF INSTITUTION OF INVESTIGATION

Institution of investigation pursuant to 19 U.S.C. 1337

AGENCY: U.S. International Trade Commission

ACTION: Notice

SUMMARY: Notice is hereby given that a complaint was filed with the U.S. International Trade Commission on February 18, 2025, under section 337 of the Tariff Act of 1930, as amended, on behalf of Longitude Licensing Ltd. of Ireland and Marlin Semiconductor Limited of Ireland. The complaint was supplemented on February 21, 2025, and March 10, 2025. The complaint, as supplemented, alleges violations of section 337 based upon the importation into the United States, the sale for importation, and the sale within the United States after importation of certain foreign-fabricated semiconductor devices, products containing the same, and components thereof by reason of the infringement of certain claims of U.S. Patent No. 7,745,847 ("the '847 Patent"); U.S. Patent No. 9,093,473 ("the '473 Patent"); U.S. Patent No. 9,147,747 ("the '747 Patent"); U.S. Patent No. 9,184,292 ("the '292 Patent"); and U.S. Patent No. 9,953,880 ("the '880 Patent"). The complaint further alleges that an industry in the United States exists or is in the process of being established as required by the applicable Federal Statute.

The complainant requests that the Commission institute an investigation and, after the investigation, issue a limited exclusion order and cease and desist orders.

ADDRESSES: The complaint, except for any confidential information contained therein, may be viewed on the Commission's electronic docket (EDIS) at https://edis.usitc.gov. For help accessing EDIS, please email EDIS3Help@usitc.gov. Hearing impaired individuals are advised that information on this matter can be obtained by contacting the Commission's TDD terminal on (202) 205-1810. Persons with mobility impairments who will need special assistance in gaining access to the Commission should contact the Office of the Secretary at (202) 205-2000. General information concerning the Commission may also be obtained by accessing its internet server at https://www.usitc.gov.

FOR FURTHER INFORMATION CONTACT: Pathenia M. Proctor, The Office of Unfair Import Investigations, U.S. International Trade Commission, (202) 205-1802.

SUPPLEMENTARY INFORMATION:

AUTHORITY: The authority for institution of this investigation is contained in section 337 of the Tariff Act of 1930, as amended, 19 U.S.C. 1337, and in section 210.10 of the Commission's Rules of Practice and Procedure, 19 C.F.R. 210.10 (2024).

SCOPE OF INVESTIGATION: Having considered the complaint, the U.S. International Trade Commission, on March 20, 2025, ORDERED THAT –

(1) Pursuant to subsection (b) of section 337 of the Tariff Act of 1930, as amended, an investigation be instituted to determine whether there is a violation of subsection (a)(1)(B) of section 337 in the importation into the United States, the sale for importation, or the sale within the United States after importation of certain products identified in paragraph (2) by reason of infringement of one or more of claims 1-5 and 7-11 of the '847 patent; claims 1-10 of the '473 patent; claims 1-3, 6, and 7 of the '747 patent; claims 1, 3-9, 11-15, and 17-20 of the '292 patent; and claims 1-12 of the '880 patent, and whether an industry in the United States exists as required by subsection (a)(2) of section 337;

(2) Pursuant to section 210.10(b)(1) of the Commission's Rules of Practice and Procedure, 19 C.F.R. 210.10(b)(1), the plain language description of the accused products or category of accused products, which defines the scope of the investigation, is "(a) non-x86 semiconductor devices, consisting of semiconductor wafers or semiconductor dies, manufactured using TSMC's 7 nm and smaller process nodes outside of the United States; (b) products containing the same consisting of: (i) standalone integrated circuits and circuit boards containing such semiconductor devices, and (ii) systems containing such semiconductor devices, consisting of smartphones, tablets, personal computers, smartwatches, and network units; and (c) components thereof consisting of: (i) components of such semiconductor devices (partial wafers), and (ii) components of such products (integrated circuit packaging and system subassemblies)." The phrase "non-x86 semiconductor devices" refers to semiconductor devices, other than those which are made by or for Intel Corporation or Advanced Micro Devices, Inc., and their subsidiaries.

(3) Pursuant to Commission Rule 210.50(b)(l), 19 C.F.R. § 210.50(b)(1), the presiding administrative law judge shall take evidence or other information and hear arguments from the parties or other interested persons with respect to the public interest in this investigation, as appropriate, and provide the Commission with findings of fact and a recommended determination on this issue, which shall be limited to the statutory public interest factors set forth in 19 U.S.C. §§ l337(d)(l), (f)(1), (g)(1);

(4) For the purpose of the investigation so instituted, the following are hereby named as parties upon which this notice of investigation shall be served:

(a) The complainants are:

Longitude Licensing Ltd.
Blanchardstown Corporate Park 2
Plaza 255, Suite 2A
Dublin D15 YH6H, Ireland

Marlin Semiconductor Limited
Blanchardstown Corporate Park 2
Plaza 255, Suite 2A
Dublin D15 YH6H, Ireland

(b) The respondents are the following entities alleged to be in violation of section 337, and are the parties upon which the complaint is to be served:

Taiwan Semiconductor Manufacturing
Company Limited
8, Li-Hsin Rd. 6
Hsinchu Science Park
Hsinchu 300-096
Taiwan, R.O.C.

Apple Inc.
1 Apple Park Way
Cupertino, CA 95014

Broadcom Inc.
3421 Hillview Ave
Palo Alto, CA 94304

Lenovo Group Limited
23rd Floor, Lincoln House
Taikoo Place
979 King's Road
Quarry Bay
Hong Kong S.A.R. of China

Motorola (Wuhan) Mobility Technologies
Communication Company Limited
No. 19, Gaoxin 4th Road
Donghu New Technology Development Zone
Wuhan, Hubei
China 430205

Motorola Mobile Communication
Technology Ltd.

Room 203A, Area A
No. 178 Xinfeng Road
Huizhi Space, Torch High-tech Zone
Xiamen, Fujian
China 361006

OnePlus Technology (Shenzhen) Co., Ltd.
18th Floor, Block C, Tairan Building
Tairan 8th Road
Shenzhen, Guangdong
China 518040

Qualcomm Inc.
5775 Morehouse Drive
San Diego, CA 92121

(c) The Office of Unfair Import Investigations, U.S. International Trade Commission, 500 E Street, S.W., Suite 401, Washington, D.C. 20436; and

(5) For the investigation so instituted, the Chief Administrative Law Judge, U.S. International Trade Commission, shall designate the presiding Administrative Law Judge.

Responses to the complaint and the notice of investigation must be submitted by the named respondents in accordance with section 210.13 of the Commission's Rules of Practice and Procedure, 19 C.F.R. 210.13. Pursuant to 19 C.F.R. 201.16(e) and 210.13(a) such responses will be considered by the Commission if received not later than 20 days after the date of service by the Commission of the complaint and the notice of investigation. Extensions of time for submitting responses to the complaint and the notice of investigation will not be granted unless good cause therefor is shown.

Failure of a respondent to file a timely response to each allegation in the complaint and in this notice may be deemed to constitute a waiver of the right to appear and contest the allegations of the complaint and this notice, and to authorize the administrative law judge and the Commission, without further notice to the respondent, to find the facts to be as alleged in the complaint and this notice and to enter an initial determination and a final determination containing such findings, and may result in the issuance of an exclusion order or a cease and desist order or both directed against the respondent.

By order of the Commission.

Lisa Barton
Secretary to the Commission

Issued: March 21, 2025

UNITED STATES INTERNATIONAL TRADE COMMISSION
Washington, D.C.

In the Matter of **CERTAIN FOREIGN-FABRICATED SEMICONDUCTOR DEVICES, PRODUCTS CONTAINING THE SAME, AND COMPONENTS THEREOF**	**Inv. No. 337-TA-1443**

DESIGNATION OF OUII ATTORNEY
FOR SERVICE OF PROCESS

The Office of Unfair Import Investigations ("OUII") hereby designates Cortney Hoecherl, Esq., (202) 205-2252, Cortney.Hoecherl@usitc.gov, as OUII's lead attorney for service of process. It is requested that all documents served by the Commission or filed by the parties in the above-referenced investigation be served upon this attorney.

Respectfully submitted,

David O. Lloyd, Supervisory Attorney

OFFICE OF UNFAIR IMPORT INVESTIGATIONS
U.S. International Trade Commission
500 E Street, S.W., Suite 401
Washington, D.C. 20436
(202) 205-2560

March 20, 2025

CERTAIN FOREIGN-FABRICATED SEMICONDUCTOR DEVICES, PRODUCTS CONTAINING THE SAME, AND COMPONENTS THEREOF **Inv. No. 337-TA-1443**

PUBLIC CERTIFICATE OF SERVICE

I, Lisa R. Barton, hereby certify that the attached **INSTITUTION OF INVESTIGATION** has been served via EDIS upon the Commission Investigative Attorney, **Cortney Hoecherl**., **Esq.** and the following parties as indicated, on **March 21, 2025**.

Lisa R. Barton, Secretary
U.S. International Trade Commission
500 E Street, SW, Room 112
Washington, DC 20436

Complainants:

Longitude Licensing Ltd.
Blanchardstown Corporate Park 2
Plaza 255, Suite 2A
Dublin D15 YH6H, Ireland

☐ Via Hand Delivery
☐ Via Express Delivery
☐ Via First Class Mail
☒ Other: Email Notification of Availability for Download

Marlin Semiconductor Limited
Blanchardstown Corporate Park 2
Plaza 255, Suite 2A
Dublin D15 YH6H, Ireland

☐ Via Hand Delivery
☐ Via Express Delivery
☐ Via First Class Mail
☒ Other: Email Notification of Availability for Download

On Behalf of Complainants Longitude Licensing Ltd. and Marlin Semiconductor Limited:

Michael T. Renaud, Esq.
MINTZ LEVIN COHN FERRIS GLOVSKY AND POPEO PC
One Financial Center
Boston, MA 02111
Email: MTRenaud@mintz.com

☐ Via Hand Delivery
☐ Via Express Delivery
☐ Via First Class Mail
☒ Other: Email Notification of Availability for Download

Certificate of Service – Page 2

Respondents:

Taiwan Semiconductor Manufacturing Company Limited 8, Li-Hsin Rd. 6 Hsinchu Science Park Hsinchu 300-096 Taiwan, R.O.C.	☐ Via Hand Delivery ☒ Via Express Delivery ☐ Via First Class Mail ☐ Other: Service to Be Completed by Complainant
Apple Inc. 1 Apple Park Way Cupertino, CA 95014	☐ Via Hand Delivery ☒ Via Express Delivery ☐ Via First Class Mail ☐ Other: Service to Be Completed by Complainant
Broadcom Inc. 3421 Hillview Ave Palo Alto, CA 94304	☐ Via Hand Delivery ☒ Via Express Delivery ☐ Via First Class Mail ☐ Other: Service to Be Completed by Complainant
Lenovo Group Limited 23rd Floor, Lincoln House Taikoo Place 979 King's Road Quarry Bay Hong Kong S.A.R. of China	☐ Via Hand Delivery ☒ Via Express Delivery ☐ Via First Class Mail ☐ Other: Service to Be Completed by Complainant
Motorola (Wuhan) Mobility Technologies Communication Company Limited No. 19, Gaoxin 4th Road Donghu New Technology Development Zone Wuhan, Hubei China 430205	☐ Via Hand Delivery ☒ Via Express Delivery ☐ Via First Class Mail ☐ Other: Service to Be Completed by Complainant
Motorola Mobile Communication Technology Ltd. Room 203A, Area A No. 178 Xinfeng Road Huizhi Space, Torch High-tech Zone Xiamen, Fujian China 361006	☐ Via Hand Delivery ☒ Via Express Delivery ☐ Via First Class Mail ☐ Other: Service to Be Completed by Complainant

OnePlus Technology (Shenzhen) Co., Ltd.
18th Floor, Block C, Tairan Building
Tairan 8th Road
Shenzhen, Guangdong China 518040

☐ Via Hand Delivery
☒ Via Express Delivery
☐ Via First Class Mail
☐ Other: Service to Be Completed by Complainant

Qualcomm Inc.
5775 Morehouse Drive
San Diego, CA 92121

☐ Via Hand Delivery
☒ Via Express Delivery
☐ Via First Class Mail
☐ Other: Service to Be Completed by Complainant

Embassy:

Embassy of China
3505 International Place, NW
Washington, DC 20008

☐ Via Hand Delivery
☒ Via Express Delivery
☐ Via First Class Mail
☐ Other: Service to Be Completed by Complainant

Taipei Economic & Cultural Representative Office:

Taipei Economic & Cultural Representative Office
4201 Wisconsin Avenue, NW
Washington, DC 20016

☐ Via Hand Delivery
☒ Via Express Delivery
☐ Via First Class Mail
☐ Other: Service to Be Completed by Complainant

Hong Kong Economic and Trade Office

Hong Kong Economic and Trade Office
1520 18th Street, NW
Washington, DC 20036

☐ Via Hand Delivery
☒ Via Express Delivery
☐ Via First Class Mail
☐ Other: Service to Be Completed by Complainant

Certificate of Service – Page 4

Government Agencies:

Lynda Marshall International Section, Antitrust Division U.S. Department of Justice 450 5th Street NW, Room 11000 Washington, DC 20530	☐ Via Hand Delivery ☐ Via Express Delivery ☐ Via First Class Mail ☒ Other: Email Notification of Availability for Download
Dax Terrill, Chief Exclusion Order Enforcement Branch U.S. Customs and Border Protection Regulations and Rulings 90 K Street NE – 10th Floor Washington, DC 20229	☐ Via Hand Delivery ☐ Via Express Delivery ☐ Via First Class Mail ☒ Other: Email Notification of Availability for Download
Maria B. Coppola International Antitrust, Office of International Affairs Federal Trade Commission 600 Pennsylvania Avenue, Room 498 Washington, DC 20580	☐ Via Hand Delivery ☐ Via Express Delivery ☐ Via First Class Mail ☒ Other: Email Notification of Availability for Download
Summer E. Young, PH.D., J.D. HHS Office of the General Counsel, NIH Branch National Institutes of Health 31 Center Drive Bldg. 31, Room 2B-50 Bethesda, MD 20892	☐ Via Hand Delivery ☐ Via Express Delivery ☐ Via First Class Mail ☒ Other: Email Notification of Availability for Download

UNITED STATES INTERNATIONAL TRADE COMMISSION

WASHINGTON, DC 20436

March 21, 2025

Longitude Licensing Ltd.
Blanchardstown Corporate Park 2
Plaza 255, Suite 2A
Dublin, D15 YH6H, Ireland

Re: Certain Foreign-Fabricated Semiconductor Devices, Products Containing the Same, and Components Thereof; Inv. No. 337-TA-1443

Dear Sir/Madam:

This letter is to advise you that the U.S. International Trade Commission has instituted an investigation pursuant to section 337 of the Tariff Act of 1930 (19 U.S.C. 1337). A copy of the Commission's notice of investigation is enclosed. Also enclosed is the Section 337 Mediation Program brochure. After reviewing the brochure, please sign and return the enclosed certification of receipt.

Sincerely,

Lisa R. Barton
Secretary

Enclosures:
1. Notice of Investigation
2. Publication Regarding the Section 337 Mediation Program
3. Certification of Receipt of Mediation Materials

UNITED STATES INTERNATIONAL TRADE COMMISSION

WASHINGTON, DC 20436

March 21, 2025

Marlin Semiconductor Limited
Blanchardstown Corporate Park 2
Plaza 255, Suite 2A
Dublin, D15 YH6H, Ireland

Re: Certain Foreign-Fabricated Semiconductor Devices, Products Containing the Same, and Components Thereof; Inv. No. 337-TA-1443

Dear Sir/Madam:

This letter is to advise you that the U.S. International Trade Commission has instituted an investigation pursuant to section 337 of the Tariff Act of 1930 (19 U.S.C. 1337). A copy of the Commission's notice of investigation is enclosed. Also enclosed is the Section 337 Mediation Program brochure. After reviewing the brochure, please sign and return the enclosed certification of receipt.

Sincerely,

Lisa R. Barton
Secretary

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UNITED STATES INTERNATIONAL TRADE COMMISSION

WASHINGTON, DC 20436

March 21, 2025

Michael T. Renaud
Mintz Levin Cohn Ferris Glovsky and Popeo PC
One Financial Center
Boston, MA 02111

Re: Certain Foreign-Fabricated Semiconductor Devices, Products Containing the Same, and Components Thereof; Inv. No. 337-TA-1443

Dear Michael T. Renaud:

This letter is to advise you that the U.S. International Trade Commission has instituted an investigation pursuant to section 337 of the Tariff Act of 1930 (19 U.S.C. 1337). A copy of the Commission's notice of investigation is enclosed. Also enclosed is the Section 337 Mediation Program brochure. After reviewing the brochure, please sign and return the enclosed certification of receipt.

Sincerely,

Lisa R. Barton
Secretary

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UNITED STATES INTERNATIONAL TRADE COMMISSION

WASHINGTON, DC 20436

March 21, 2025

Taiwan Semiconductor Manufacturing
Company Limited
8, Li-Hsin Rd. 6 Hsinchu Science Park
Hsinchu 300-096
Taiwan, R.O.C.

Re: Certain Foreign-Fabricated Semiconductor Devices, Products Containing the Same, and Components Thereof; Inv. No. 337-TA-1443

Dear Sir/Madam:

This letter is to advise you that the United States International Trade Commission has instituted an investigation pursuant to Section 337 of the Tariff Act of 1930 (19 U.S.C. 1337). **Taiwan Semiconductor Manufacturing Company Limited** is a named respondent in this investigation.

We are hereby serving you with a copy of the Complaint and the Notice of Investigation issued in this matter. Enclosed is a copy of the Code of Federal Regulations. Also enclosed is a the Section 337 Mediation Program brochure. After reviewing this brochure, please sign and return the enclosed certification of receipt.

Please note that the Notice requires a response to the allegations in the Complaint and the response must be received not later than twenty (20) days after the date of service of the Complaint. Failure to file a response may result in inferences being drawn against your interests.

Sincerely,

Lisa R. Barton
Secretary

Enclosures:
1. Complaint
2. Notice of Investigation
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5. Certification of Receipt of Mediation Materials

UNITED STATES INTERNATIONAL TRADE COMMISSION

WASHINGTON, DC 20436

March 21, 2025

Apple Inc.
1 Apple Park Way
Cupertino, 95014

Re: Certain Foreign-Fabricated Semiconductor Devices, Products Containing the Same, and Components Thereof; Inv. No. 337-TA-1443

Dear Sir/Madam:

This letter is to advise you that the United States International Trade Commission has instituted an investigation pursuant to Section 337 of the Tariff Act of 1930 (19 U.S.C. 1337). **Apple Inc.** is a named respondent in this investigation.

We are hereby serving you with a copy of the Complaint and the Notice of Investigation issued in this matter. Enclosed is a copy of the Code of Federal Regulations. Also enclosed is a the Section 337 Mediation Program brochure. After reviewing this brochure, please sign and return the enclosed certification of receipt.

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Sincerely,

Lisa R. Barton
Secretary

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UNITED STATES INTERNATIONAL TRADE COMMISSION

WASHINGTON, DC 20436

March 21, 2025

Broadcom Inc.
3421 Hillview Ave
Palo Alto, CA 94304

Re: Certain Foreign-Fabricated Semiconductor Devices, Products Containing the Same, and Components Thereof; Inv. No. 337-TA-1443

Dear Sir/Madam:

This letter is to advise you that the United States International Trade Commission has instituted an investigation pursuant to Section 337 of the Tariff Act of 1930 (19 U.S.C. 1337). **Broadcom Inc.** is a named respondent in this investigation.

We are hereby serving you with a copy of the Complaint and the Notice of Investigation issued in this matter. Enclosed is a copy of the Code of Federal Regulations. Also enclosed is a the Section 337 Mediation Program brochure. After reviewing this brochure, please sign and return the enclosed certification of receipt.

Please note that the Notice requires a response to the allegations in the Complaint and the response must be received not later than twenty (20) days after the date of service of the Complaint. Failure to file a response may result in inferences being drawn against your interests.

Sincerely,

Lisa R. Barton
Secretary

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UNITED STATES INTERNATIONAL TRADE COMMISSION

WASHINGTON, DC 20436

March 21, 2025

Lenovo Group Limited
23rd Floor, Lincoln House Taikoo Place
979 King's Road
Quarry Bay
Hong Kong, S.A.R. of China

Re: Certain Foreign-Fabricated Semiconductor Devices, Products Containing the Same, and Components Thereof; Inv. No. 337-TA-1443

Dear Sir/Madam:

This letter is to advise you that the United States International Trade Commission has instituted an investigation pursuant to Section 337 of the Tariff Act of 1930 (19 U.S.C. 1337). **Lenovo Group Limited** is a named respondent in this investigation.

We are hereby serving you with a copy of the Complaint and the Notice of Investigation issued in this matter. Enclosed is a copy of the Code of Federal Regulations. Also enclosed is a the Section 337 Mediation Program brochure. After reviewing this brochure, please sign and return the enclosed certification of receipt.

Please note that the Notice requires a response to the allegations in the Complaint and the response must be received not later than twenty (20) days after the date of service of the Complaint. Failure to file a response may result in inferences being drawn against your interests.

Sincerely,

Lisa R. Barton
Secretary

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UNITED STATES INTERNATIONAL TRADE COMMISSION

WASHINGTON, DC 20436

March 21, 2025

Motorola (Wuhan) Mobility Technologies Communication Company Limited
No. 19, Gaoxin 4th Road
Donghu New Technology Development Zone
Wuhan, Hubei, China, 430205

Re: Certain Foreign-Fabricated Semiconductor Devices, Products Containing the Same, and Components Thereof; Inv. No. 337-TA-1443

Dear Sir/Madam:

This letter is to advise you that the United States International Trade Commission has instituted an investigation pursuant to Section 337 of the Tariff Act of 1930 (19 U.S.C. 1337). **Motorola (Wuhan) Mobility Technologies Communication Company Limited** is a named respondent in this investigation.

We are hereby serving you with a copy of the Complaint and the Notice of Investigation issued in this matter. Enclosed is a copy of the Code of Federal Regulations. Also enclosed is a the Section 337 Mediation Program brochure. After reviewing this brochure, please sign and return the enclosed certification of receipt.

Please note that the Notice requires a response to the allegations in the Complaint and the response must be received not later than twenty (20) days after the date of service of the Complaint. Failure to file a response may result in inferences being drawn against your interests.

Sincerely,

Lisa R. Barton
Secretary

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5. Certification of Receipt of Mediation Materials

UNITED STATES INTERNATIONAL TRADE COMMISSION

WASHINGTON, DC 20436

March 21, 2025

Motorola Mobile Communication Technology Ltd.
Room 203A, Area A No. 178 Xinfeng Road
Huizhi Space, Torch High-tech Zone
Xiamen, Fujian, China 361006

Re: Certain Foreign-Fabricated Semiconductor Devices, Products Containing the Same, and Components Thereof; Inv. No. 337-TA-1443

Dear Sir/Madam:

This letter is to advise you that the United States International Trade Commission has instituted an investigation pursuant to Section 337 of the Tariff Act of 1930 (19 U.S.C. 1337). **Motorola Mobile Communication Technology Ltd.** is a named respondent in this investigation.

We are hereby serving you with a copy of the Complaint and the Notice of Investigation issued in this matter. Enclosed is a copy of the Code of Federal Regulations. Also enclosed is a the Section 337 Mediation Program brochure. After reviewing this brochure, please sign and return the enclosed certification of receipt.

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Sincerely,

Lisa R. Barton
Secretary

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UNITED STATES INTERNATIONAL TRADE COMMISSION

WASHINGTON, DC 20436

March 21, 2025

OnePlus Technology (Shenzhen) Co., Ltd.
18th Floor, Block C, Tairan Building Tairan 8th Road
Shenzhen, Guangdong, 518040

Re: Certain Foreign-Fabricated Semiconductor Devices, Products Containing the Same, and Components Thereof; Inv. No. 337-TA-1443

Dear Sir/Madam:

This letter is to advise you that the United States International Trade Commission has instituted an investigation pursuant to Section 337 of the Tariff Act of 1930 (19 U.S.C. 1337). **OnePlus Technology (Shenzhen) Co., Ltd.** is a named respondent in this investigation.

We are hereby serving you with a copy of the Complaint and the Notice of Investigation issued in this matter. Enclosed is a copy of the Code of Federal Regulations. Also enclosed is a the Section 337 Mediation Program brochure. After reviewing this brochure, please sign and return the enclosed certification of receipt.

Please note that the Notice requires a response to the allegations in the Complaint and the response must be received not later than twenty (20) days after the date of service of the Complaint. Failure to file a response may result in inferences being drawn against your interests.

Sincerely,

Lisa R. Barton
Secretary

Enclosures:

1. Complaint
2. Notice of Investigation
3. Code of Federal Regulation
4. Publication Regarding the Section 337 Mediation Program
5. Certification of Receipt of Mediation Materials

UNITED STATES INTERNATIONAL TRADE COMMISSION

WASHINGTON, DC 20436

March 21, 2025

Qualcomm Inc.
5775 Morehouse Drive
San Diego, CA 92121

Re: Certain Foreign-Fabricated Semiconductor Devices, Products Containing the Same, and Components Thereof; Inv. No. 337-TA-1443

Dear Sir/Madam:

This letter is to advise you that the United States International Trade Commission has instituted an investigation pursuant to Section 337 of the Tariff Act of 1930 (19 U.S.C. 1337). **Qualcomm Inc.** is a named respondent in this investigation.

We are hereby serving you with a copy of the Complaint and the Notice of Investigation issued in this matter. Enclosed is a copy of the Code of Federal Regulations. Also enclosed is a the Section 337 Mediation Program brochure. After reviewing this brochure, please sign and return the enclosed certification of receipt.

Please note that the Notice requires a response to the allegations in the Complaint and the response must be received not later than twenty (20) days after the date of service of the Complaint. Failure to file a response may result in inferences being drawn against your interests.

Sincerely,

Lisa R. Barton
Secretary

Enclosures:

1. Complaint
2. Notice of Investigation
3. Code of Federal Regulation
4. Publication Regarding the Section 337 Mediation Program
5. Certification of Receipt of Mediation Materials

UNITED STATES INTERNATIONAL TRADE COMMISSION

WASHINGTON, DC 20436

March 21, 2025

Embassy of China
3505 International Place, N.W.
Washington DC 20008

Re: Certain Foreign-Fabricated Semiconductor Devices, Products Containing the Same, and Components Thereof; Inv. No. 337-TA-1443

Dear Sir/Madam:

This letter is to advise you that the United States International Trade Commission has instituted an investigation pursuant to Section 337 of the Tariff Act of 1930 (19 U.S.C. 1337). One or more of the parties named in the investigation is located in **China.**

Pursuant to Commission Rule 210.11(a) (3), we are hereby serving you with a copy of the Complaint filed in this investigation together with a copy of the Commission's Notice of Investigation.

Sincerely,

Lisa R. Barton
Secretary

Enclosures:
1. Complaint
2. Notice of Investigation

March 21, 2025

Hong Kong Economic and Trade Office
1520 18th Street, NW
Washington, DC 20036

Re: Certain Foreign-Fabricated Semiconductor Devices, Products Containing the Same, and Components Thereof; Inv. No. 337-TA-1443

Dear Sir/Madam:

This letter is to advise you that the United States International Trade Commission has instituted an investigation pursuant to Section 337 of the Tariff Act of 1930 (19 U.S.C. 1337). One or more of the parties named in the investigation is located in **Hong Kong**.

Pursuant to Commission Rule 210.11(a) (3), we are hereby serving you with a copy of the Complaint filed in this investigation together with a copy of the Commission's Notice of Investigation.

Sincerely,

Lisa R. Barton
Secretary

Enclosures:
1. Complaint
2. Notice of Investigation

March 21, 2025

Taipei Economic & Cultural Representative Office
4201 Wisconsin Avenue, NW
Washington, DC 20016

Re: Certain Foreign-Fabricated Semiconductor Devices, Products Containing the Same, and Components Thereof; Inv. No. 337-TA-1443

Dear Sir/Madam:

This letter is to advise you that the United States International Trade Commission has instituted an investigation pursuant to Section 337 of the Tariff Act of 1930 (19 U.S.C. 1337). One or more of the parties named in the investigation is located in **Taiwan**.

Pursuant to Commission Rule 210.11(a) (3), we are hereby serving you with a copy of the Complaint filed in this investigation together with a copy of the Commission's Notice of Investigation.

Sincerely,

Lisa R. Barton

Enclosures:
1. Complaint
2. Notice of Investigation

cc: American Institute in Taiwan, via electronic mail

UNITED STATES INTERNATIONAL TRADE COMMISSION

WASHINGTON, DC 20436

March 21, 2025

Lynda Marshall
International Section
Antitrust Division
U.S. Dept of Justice
450 5th Street NW, Room 11000
Washington, DC 20530

Re: Certain Foreign-Fabricated Semiconductor Devices, Products Containing the Same, and Components Thereof; Inv. No. 337-TA-1443

Dear Lynda Marshall:

This letter is to advise you that the United States International Trade Commission has instituted an investigation pursuant to Section 337 of the Tariff Act of 1930 (19 U.S.C. 1337). A copy of the Notice of Investigation is enclosed. Non-confidential copies of the Complaint and any supplements filed in the investigation will be provided upon request. Requests should be directed to Docket Services at (202) 205-1802.

If you have any questions concerning this investigation, please contact the Commission Investigative Attorney whose name and telephone number appear in the enclosed Notice.

Sincerely,

Lisa R. Barton
Secretary

Enclosure:
1. Notice of Investigation

UNITED STATES INTERNATIONAL TRADE COMMISSION

WASHINGTON, DC 20436

March 21, 2025

Dax Terrill, Chief
Exclusion Order Enforcement Branch
U.S. Customs and Border Protection
Regulations and Rulings
90 K Street NE, 10th Floor
Washington, DC 20229-1177

Re: Certain Foreign-Fabricated Semiconductor Devices, Products Containing the Same, and Components Thereof; Inv. No. 337-TA-1443

Dear Dax Terrill:

This letter is to advise you that the United States International Trade Commission has instituted an investigation pursuant to Section 337 of the Tariff Act of 1930 (19 U.S.C. 1337). A copy of the Notice of Investigation is enclosed. Non-confidential copies of the Complaint and any supplements filed in the investigation will be provided upon request. Requests should be directed to Docket Services at (202) 205-1802.

If you have any questions concerning this investigation, please contact the Commission Investigative Attorney whose name and telephone number appear in the enclosed Notice.

Sincerely,

Lisa R. Barton
Secretary

Enclosure:
1. Notice of Investigation

UNITED STATES INTERNATIONAL TRADE COMMISSION

WASHINGTON, DC 20436

March 21, 2025

Maria B. Coppola
Office of International Affairs
Federal Trade Commission
600 Pennsylvania Avenue, Room 498
Washington, DC 20580

Re: Certain Foreign-Fabricated Semiconductor Devices, Products Containing the Same, and Components Thereof; Inv. No. 337-TA-1443

Dear Maria B. Coppola:

This letter is to advise you that the United States International Trade Commission has instituted an investigation pursuant to Section 337 of the Tariff Act of 1930 (19 U.S.C. 1337). A copy of the Notice of Investigation is enclosed. Non-confidential copies of the Complaint and any supplements filed in the investigation will be provided upon request. Requests should be directed to Docket Services at (202) 205-1802.

If you have any questions concerning this investigation, please contact the Commission Investigative Attorney whose name and telephone number appear in the enclosed Notice.

Sincerely,

Lisa R. Barton
Secretary

Enclosure:
1. Notice of Investigation

UNITED STATES INTERNATIONAL TRADE COMMISSION

WASHINGTON, DC 20436

March 21, 2025

Summer E. Young, Ph.D., J.D.
HHS Office of the General Counsel, NIH Branch
National Institutes of Health
31 Center Drive
Building 31, Room 2B-50
Bethesda, MD 20892

Re: Certain Foreign-Fabricated Semiconductor Devices, Products Containing the Same, and Components Thereof; Inv. No. 337-TA-1443

Dear Summer Young:

This letter is to advise you that the United States International Trade Commission has instituted an investigation pursuant to Section 337 of the Tariff Act of 1930 (19 U.S.C. 1337). A copy of the Notice of Investigation is enclosed. Non-confidential copies of the Complaint and any supplements filed in the investigation will be provided upon request. Requests should be directed to Docket Services at (202) 205-1802.

If you have any questions concerning this investigation, please contact the Commission Investigative Attorney whose name and telephone number appear in the enclosed Notice.

Sincerely,

Lisa R. Barton
Secretary

Enclosure:
1. Notice of Investigation

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

LONGITUDE LICENSING LTD., and MARLIN SEMICONDUCTOR LIMITED, *Plaintiffs*, v. APPLE, INC., BROADCOM INC. and QUALCOMM INC., *Defendants*.	Case No. 1:25-cv-215-RP

ORDER GRANTING UNOPPOSED MOTION TO STAY ACTION PURSUANT TO 28 U.S.C. § 1659 PENDING PARALLEL ITC ACTION

This Court, having considered the Unopposed Motion to Stay Action Pursuant to 28 U.S.C. 1659 Pending Parallel ITC Action as to Defendants Apple Inc., Broadcom Inc., and Qualcomm, Incorporated (the "Motion") hereby orders Grants the Motion and Orders the following:

IT IS ORDERED that this case is STAYED as to Defendants Apple Inc., Broadcom Inc., and Qualcomm, Incorporated until the final determination of *Certain Foreign-Fabricated Semiconductor Devices, Products Containing the Same, and Components Thereof*, Inv. No. 337-TA-1443, by the U.S. International Trade Commission, pursuant to 28 U.S.C. § 1659(a), including during any appeals thereof. *In re Princo Corp.*, 478 F.3d 1345, 1355 (Fed. Cir. 2007).

SIGNED this _____ day of _____, 2025.

_____
THE HONORABLE ALAN ALBRIGHT
UNITED STATES DISTRICT JUDGE