

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

FORCE MOS TECHNOLOGY, CO., LTD.,	)	
	)	
Plaintiff,	)	Civil Action No. 2:22-cv-00460 - JRG
	)	
v.	)	
	)	JURY TRIAL DEMAND
ASUSTEK COMPUTER, INC.	)	
	)	
Defendant.	)	
	)	

PLAINTIFF’S FIRST AMENDED INFRINGEMENT CONTENTIONS

Pursuant to Local Patent Rules 3-1 and 3-2, and by agreement of the Parties, Plaintiff Force MOS Technology, Co., Ltd., (“Force MOS”) hereby provides its disclosure of asserted claims and first amended infringement contentions and accompanying document production. Force MOS’s disclosures are made with limited information from Defendant ASUSTek Computer, Inc. (“ASUS”) and without information that has not yet been made available to Force MOS during discovery, which may be specifically relevant to Force MOS’s infringement claims. Force MOS reserves the right to supplement or alter its disclosures herein based on additional information obtained through discovery concerning ASUS’s products.

**I. DISCLOSURE OF ASSERTED CLAIMS AND INFRINGEMENT
CONTENTIONS**

A. Infringed Claims

Claims 1-9 of U.S. Patent No. 7,629,634 (“’634 Patent”); Claims 1-7 and 16-20 of U.S. Patent No. 7,847,346 (“’346 Patent”); and Claim 1 of U.S. Patent No. 7,812,409 (“’409 Patent”) are asserted. Force MOS reserves the right to amend and supplement its

identification of asserted claims based upon additional information obtained through formal discovery.

B. Infringing Products

Force MOS asserts infringement against ASUS products containing the following MOSFETs identified by component number and supplier name: 2N7002K (Panjit International Inc.); 2N7002KDW (Panjit International Inc.); PJX138K (Panjit International Inc.); L2N7002SLT1G (Leshan Radio Company); QM3016AM (UBIQ Semiconductor Inc.); QM3058M6 (UBIQ Semiconductor Inc.); EMB20N03V (Excelliance MOS Co., Ltd.); PE616BA (Niko Semiconductor Co., Ltd.); and AP3P021H (Advanced Power Electronics Corp.).

These MOSFETs are contained in the following representative infringing ASUS products: ASUS ROG Strix Z790, ASUS PH-GTX1660S-06G, ASUS DUAL-RTX3060-O8G, E410M Laptop, E410MA Laptop, Zenbook Pro 14 UX6404VI, ASUS TUF Gaming Z490-Plus, and EX-B760M-V5 D4.

C. Claim Charts for Literal Infringement

Force MOS's detailed First Amended infringement assertions for the Accused Products are contained in claim charts provided as Exhibits A-W.

Force MOS reserves the right to augment and supplement its First Amended Claim Charts based upon additional information obtained through formal discovery.

D. Doctrine of Equivalents

Force MOS alleges that ASUS literally infringes all claims identified above. To the extent any differences are alleged to exist between the above-identified claims and ASUS's infringing products, such differences are insubstantial and ASUS's products perform substantially the same

function, in substantially the same way, to yield substantially the same result, and therefore ASUS infringes under the doctrine of equivalents.

Force MOS reserves the right to augment and supplement its disclosure concerning the doctrine of equivalents based upon additional information obtained through formal discovery.

E. Priority Claim to an Earlier Application

The '634 Patent claims priority to February 23, 2008, the filing date of U.S. Patent Application Serial No. 12/036,243. The '346 Patent claims priority to November 26, 2008, the filing date of U.S. Patent Application Serial No. 12/292,780. The '409 Patent claims priority to December 4, 2006, the filing date of U.S. Patent Application Serial No. 11/633,366. The relevant prosecution histories can be found at FORCE-MOS0000039, FORCE-MOS0000125, and FORCE-MOS0000227 as required by P.R. 3-2.

F. Practice of the Claimed Invention

Force MOS identifies at least the following Force MOS products that practice the Asserted Claims of the '634 Patent:

ME2301, ME2301S, ME2301A, ME2301DC, ME2301GC, ME2302, ME2302D, ME2318, ME2318S, ME2303, ME2303S, ME2304, ME2305-G, ME2306A, ME2306D, ME2306S, ME2306AS, ME2306DS, ME2307, ME2307C, ME2308D, ME2313, ME2320DS, ME2322, ME2323D, ME2324D, ME2325S, ME2326, ME2326A, ME2328, ME2333, ME2345AS, ME2347, ME1302AT3, ME1303AT3, ME1304AT3, ME1701, ME1702, ME3424D, ME3443, ME3449D, ME3483, ME3491D, ME3500, ME3587-G, ME3920, ME3920D, ME3981, ME6874, ME8205E, ME8205B-G, ME2514, ME2602, ME2604, ME2606, ME2610, ME2612, ME2614, ME2620-G, ME2645, ME20P06P, ME35N06P, ME50P06P, ME3205P, ME04N25, ME08N20, ME12N04, ME12P04, ME12N15, ME15N10, ME15N25, ME16P10, ME20N03, ME20P03,

ME20P06, ME20N10, ME20N15-G, ME20N15A-G, ME20N15F, ME25P03, ME25N06, ME25N15, ME35N06, ME35N10, ME45P04, ME50N02, ME50P04, ME50P06, ME50N06A, ME50N10, ME50N08, ME55N06, ME55N06A, ME60N03, ME60N03S, ME60N04, ME70N03S, ME75N03, ME75N03L, ME85P03, ME90N03, ME90P03, ME95N03, ME95P03, ME95N04, ME96N03-G, ME4565AD4, ME25N10T, ME35N06T, ME40P03T, ME45N03T, ME50N06T, ME50N10AT, ME50N75T, ME60N04T, ME60P06T, ME70N06T, ME70N10T, ME75N06T, ME80N75T, ME80N08A, ME80N75AT, ME95N03T, ME95N10T, ME100N03T, ME3205T, ME3205AT, ME15N25F, ME20P03F, ME25N10F, ME25N15F, ME35N06F, ME50N10F, ME50N10T, ME75N06F, ME3205F, ME80N08AF, ME80N75F, ME80N75AF, ME3205H, ME80N08AH, ME4174, ME4410A, ME4411, ME4412, ME4416, ME4417, ME4425, ME4425D, ME4435LD, ME4454, ME4456, ME4457, ME4458A, ME4464, ME4466, ME4468, ME4470, ME4472, ME4542, ME4542D, ME4544, ME4544D, ME4548, ME4566, ME4565A, ME4956, ME4626, ME4825, ME4920, ME4920D, ME4925, ME4936, ME4938D, ME4942, ME4946, ME4473, ME4947, ME4950, ME4952, ME4953, ME4954, ME4970, ME4972, ME4970A, ME8029, ME8107, ME8207, ME8117, ME8117A, ME9435, ME9435A, ME9435AS, ME9926, ME4856, ME6970, ME6970D, ME6972, ME6978ED, ME6980ED, ME6982ED, ME6986ED, ME6987, ME7202, ME7906ED, ME5937ED, ME7900ED, ME7908ED, ME7910D, ME7818S, ME7900EN, ME7114, ME7114S, ME7114AS, ME7423, ME7423S, ME7802, ME7802S, ME7804, ME7804S, ME7804AS, ME7806S, ME78101S, ME7812S, ME7814S, ME78241S, ME7835, ME7835S-G, ME7837S, ME7839S, ME7890ED, ME7170-G, ME7362, ME7386, ME7607, ME7609D, ME7636, ME7639, ME7642, ME7646, ME7686, ME768ME7890D, ME7692, ME7345, MEE7816AS, MEE15N10, ME3985DS, ME2508, ME2608, ME06N30, ME07N25, ME10N15, ME13N10A, ME120N04T, ME200N04T, ME95N10F, ME3466-G,

ME7620, MEE3712T, MEE3712H, MEE3712F, ME2306BS, ME7306-G, MEE6240T, ME04N25P, MEE3716T, MEE7636-G, ME4435-G, ME100N15T, ME25N15AL, ME4906-G, ME4485-G, MEE3718T, ME2301DN-G, ME7890ED-G, ME7644, ME7640, ME2320D, ME2320D2, ME2308DN-G, ME2306N-G, MEE4294-G, MEE4294K-G, MEE4294P, ME4413D-G, ME6602D-G, ME7807S-G, ME7705-G, ME2327DN-G, ME2308S, ME2325, ME2309, ME2345A, ME7232-G, ME6612D-G, ME6600D-G, ME7820S-G, ME2306AW-G, ME2301S-G, ME7632A-G, ME7810S-G, MEE7296-G, MEE7298H-G, MEE72982-G, ME7807AS-G, ME7630A-G, ME7824S-G, ME2320D1SG, ME2320D2-G, ME7232K-G, MEE7298HC-G, ME2306LS-G, ME3407E134L-G, ME3407E034L-G, ME4807-G, ME7805AS-G, ME02101-G, ME2333-G, ME7262S-G, MEE7268H-G, ME2333S-G, ME7732-G, ME7232S-G, MEE8268H-G, ME8248H-G, MEE8298H-G, MEE8268HK-G, MEE4298T2, MEE4298-G, MEE4298K-G, MEE4294HT, MEE2348A-G, ME4832-G, ME4662-G.

Force MOS identifies at least the following Force MOS products that practice the Asserted claims of the '346 Patent:

ME6970, ME7114S, ME02101-G, ME1302AT3, ME1303AT3, ME1304AT3, ME1701, ME1702, ME2301, ME2301A, ME2301DC, ME2301DN-G, ME2301GC, ME2301S, ME2301S-G, ME2302, ME2302D, ME2303, ME2303S, ME2304, ME2305-G, ME2306A, ME2306AS, ME2306AW-G, ME2306BS, ME2306D, ME2306DS, ME2306LS-G, ME2306N-G, ME2306S, ME2307, ME2307C, ME2308D, ME2308DNG, ME2308S, ME2309, ME2313, ME2318, ME2318S, ME2320D, ME2320D1S-G, ME2320D2, ME2320D2-G, ME2320DS, ME2322, ME2323D, ME2324D, ME2325, ME2325S, ME2326, ME2326A, ME2328, ME2333, ME2333-G, ME2333S-G, ME2345A, ME2345AS, ME2347, ME2508, ME2514, ME2602, ME2604, ME2606, ME2608, ME2610, ME2612, ME2614, ME2620-G, ME2645, ME3407E034L-G,

ME3407E134L-G, ME3424D, ME3443, ME3449D, ME3466-G, ME3483, ME3491D, ME3500, ME3587-G, ME3920, ME3920D, ME3981, ME3985DS, ME4174, ME4410A, ME4411, ME4412, ME4413D-G, ME4417, ME4425, ME4425D, ME4435-G, ME4435LD, ME4454, ME4456, ME4457, ME4458A, ME4464, ME4466, ME4468, ME4470, ME4472, ME4473, ME4485-G, ME4542, ME4542D, ME4544, ME4544D, ME4548, ME4565A, ME4566, ME4626, ME4662-G, ME4807-G, ME4825, ME4832-G, ME4856, ME4906-G, ME4920, ME4920D, ME4925, ME4936, ME4938D, ME4942, ME4946, ME4947, ME4950, ME4952, ME4953, ME4954, ME4956, ME4970, ME4970A, ME4972, ME5937ED, ME6874, ME6970D, ME6972, ME6978ED, ME6980ED, ME6982ED, ME6986ED, ME6987, ME7114, ME7114AS, ME7202, ME7232-G, ME7232S-G, ME7262S-G, ME7306-G, ME7423, ME7423S, ME7732-G, ME7802, ME7802S, ME7804AS, ME7804S, ME7805AS-G, ME7806S, ME7807AS-G, ME7807S-G, ME78101S, ME7810S-G, ME7812S, ME7814S, ME7818S, ME7820S-G, ME78241S, ME7824S-G, ME7835, ME7835S-G, ME7837S, ME7839S, ME7890ED, ME7890ED-G, ME7900ED, ME7900EN, ME7906ED, ME7908ED, ME7910D, ME8029, ME8107, ME8117, ME8117A, ME8205B-G, ME8205E, ME8207, ME9435, ME9435A, ME9435AS, ME9926, MEE2348A-G, MEE4294-G, MEE4298-G, MEE7816AS.

Force MOS identifies at least the following Force MOS products that practice the Asserted claims of the '409 Patent:

ME1303S, ME2301, ME2301S, ME2301A, ME2301DC, ME2301GC, ME2302, ME2302D, ME2318, ME2318S, ME2303, ME2303S, ME2304, ME2305-G, ME2306A, ME2306D, ME2306S, ME2306AS, ME2306DS, ME2307, ME2307C, ME2308D, ME2313, ME2320DS, ME2322, ME2323D, ME2324D, ME2325S, ME2328, ME2333, ME2345AS, ME2347, ME1302AT3, ME1303AT3, ME1304AT3, ME1701, ME1702, ME3424D, ME3443, ME3449D,

ME3483, ME3491D, ME3500, ME3500, ME3587-G, ME3587-G, ME3920, ME3920D, ME3981, ME6874, ME8205E, ME8205B-G, ME2514, ME2602, ME2614, ME2645, ME20P06P, ME35N06P, ME50P06P, ME3205P, ME12N04, ME12P04, ME15N10, ME20N03, ME20P03, ME20P06, ME20N15A-G, ME25P03, ME25N06, ME35N06, ME35N10, ME50N02, ME50P04, ME50P06, ME50N10, ME50N08, ME55N06, ME55N06A, ME60N03S, ME60N04, ME65N06T, ME70N03S, ME75N03, ME75N03L, ME85P03, ME90N03, ME90P03, ME95N03, ME95P03, ME95N04, ME96N03-G, ME4565AD4, ME4565AD4, ME25N10T, ME35N06T, ME40P03T, ME50N10AT, ME60N04T, ME60P06T, ME70N06T, ME70N10TME75N06T, ME80N75T, ME80N75AT, ME95N03T, ME100N03T, ME3205T, ME3205AT, ME20P03F, ME25N10F, ME35N06F, ME50N10F, ME50N10T, ME75N06F, ME3205F, ME80N75F, ME80N75AF, ME3205H, ME4174, ME4410A, ME4412, ME4416, ME4417, ME4425, ME4425D, ME4435LD, ME4454, ME4456, ME4457, ME4458A, ME4464, ME4466, ME4468, ME4470, ME4542, ME4542, ME4542D, ME4542D, ME4544, ME4544, ME4544D, ME4544D, ME4548, ME4548, ME4566, ME4566, ME4565A, ME4565A, ME4956, ME4956, ME4626, ME4825, ME4920, ME4920D, ME4925, ME4938D, ME4942, ME4946, ME4473, ME4947, ME4950ME4952, ME4953, ME4954, ME4970A, ME8029, ME8107, ME8207, ME8117, ME8117A, ME9435, ME9435A, ME9435AS, ME9926, ME4856, ME6970, ME6970D, ME6972, ME6978ED, ME6980ED, ME6982ED, ME6986ED, ME6987, ME7202, ME7202, ME7906ED, ME5937ED, ME7900ED, ME7908ED, ME7910D, ME7818S, ME7900EN, ME7114, ME7114S, ME7114AS, ME7423, ME7423S, ME7802, ME7802S, ME7804, ME7804S, ME7804AS, ME7806S, ME7807S, ME78101S, ME7812S, ME78241S, ME7835, ME7835S-G, ME7839S, ME7890ED, ME7170-G, ME7362, ME7386, ME7607, ME7609D, ME7636, ME7639, ME7642, ME7646, ME7686, ME7688, ME7890D, ME7692, ME7345, ME3985DS, ME2508, ME13N10A,

ME120N04T, ME7620, ME2306BS, ME7306-G, ME5602D-G, ME7457S-G, ME4435-G, ME2308DF-G, ME7845S-G, ME4485-G, ME2301DN-G, ME7890ED-G, ME7644, ME7640, ME2320D, ME2320D2, ME7632-G, ME2308DN-G, ME2306N-G, ME6606D-G, ME4662, ME4413D-G, ME6602D-G, ME7707-G, ME7705-G, ME2327DN-G, ME2308S, ME2325, ME2309, ME2345A, ME6612D-G, ME6600D-G, ME6606DH-G, ME7820S-G, ME2306AW-G, ME2301S-G, ME7632A-G, ME7807AS-G, ME7630A-G, ME7826S-G, ME7824S-G, ME7830S-G, ME2320D1S-G, ME2320D2-G, ME7542-G, ME7542-G, ME2317D-G, ME7824CS-G, ME7232K-G, ME100N04-G, ME2306LS-G, ME4807-G, ME7805AS-G, ME2333-G, ME7262S-G, ME2333S-G, ME7732-G, ME7232S-G, ME8248H-G, ME4832-G, ME4662-G, ME20N10-G, ME4411, ME7810S-G, ME7807S-G, ME7232-G, ME2323DS-G, ME7814S-G, ME7705VT-G, ME2306DS-G, ME2306D-G, ME2306S-G, ME8242H-G, ME7864CS-G, ME7864S-G, ME7828DC-G, ME7837S-G.

II. DOCUMENT PRODUCTION ACCOMPANYING DISCLOSURE (P.R. 3-2)

A. P.R. 3-2(a) Disclosure

Force MOS has no responsive documents to P.R. 3-2(a) within its possession, custody, or control. However, its investigation is ongoing and Force MOS will supplement these disclosures if it obtains any responsive documents during discovery.

B. P.R. 3-2(b) Disclosure

Force MOS has no responsive documents to P.R. 3-2(b) within its possession, custody, or control. However, its investigation is ongoing and Force MOS will supplement these disclosures if it obtains any responsive documents during discovery.

C. P.R. 3-2(c) Disclosure

Force MOS has produced the certified file histories for the '634, '346, and '409 Patents that can be found at FORCE-MOS0000039, FORCE-MOS0000125, and FORCE-MOS0000227.

Dated: May 7, 2024

Respectfully submitted,

/s/ Joshua G. Jones

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CERTIFICATE OF SERVICE

I certify that a true and correct copy of the above and foregoing document was served on counsel for plaintiff Force MOS Technology, Co., Ltd. via electronic delivery on May 7, 2024.

/s/ Joshua G. Jones

Joshua G. Jones