

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

NVIDIA Corporation,
Petitioner,

v.

Onesta IP, LLC,
Patent Owner.

Case No. IPR2026-00011
U.S. Patent No. 11,841,803

PETITIONER'S BRIEF IN OPPOSITION TO DISCRETIONARY DENIAL

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I. INTRODUCTION

NVIDIA provides GPUs for key applications across the private sector, including healthcare and drug discovery, energy and climate science, financial services, robotics, and cybersecurity, among many others. Over 40,000 American companies rely on NVIDIA GPUs in their businesses. EX1054-Wile; EX1055-Blackwell-Tech.Br.

In a parallel ITC Investigation¹, Onesta—a non-practicing entity—seeks to *exclude* from the U.S. market NVIDIA's GPUs based in part on alleged infringement of the challenged '803 patent. *See* EX1023-ITC-Complaint. Onesta acquired the '803 patent from AMD in November 2024, less than a year after it issued, and within a few months had asserted it against NVIDIA. *See* EX1023-ITC-Complaint; EX1024-District-Court-Complaint.

But the '803 patent on which Onesta has based its request for exclusion of NVIDIA's GPUs never should have issued. As the Petition shows, prior art—which was never considered by the Patent Office—discloses the alleged invention in the challenged '803 patent claims *well over a decade before* the '803 patent's filing date in 2019. Patent Owner seeks to evade review of that critical art through discretionary

¹ *Certain Integrated Circuits, Electronic Devices Containing the Same, and Components Thereof*, ITC Inv. No. 337-TA-1450 (U.S.I.T.C.).

denial under the *Fintiv* factors. But the *Fintiv* factors and other relevant considerations weigh heavily *in favor* of using Office resources for review of the patentability of the challenged claims.

First, the ITC Investigation will not resolve the invalidity issues related to the '803 patent. For one, the ITC cannot invalidate any claims, and thus, it cannot resolve any issues related to patentability. Furthermore, even considering the ITC's review, there are currently two claims (4 and 9)² challenged by the Petition that are not at issue in the ITC Investigation. Those claims (as well as all other challenged claims) are potentially at issue in the District Court matter, which is stayed pending the ITC case, and which will not be resolved until well *after* the final written decision in this proceeding. Given Petitioner's *Sotera* stipulation—which ensures that Petitioner will not raise patentability challenges based on prior art patents or printed publications in the District Court matter or ITC Investigation if the Petition is

² Patent Owner's brief misrepresents the overlap, saying that the "Petition challenges only a single dependent claim (dependent claim 4) that is not currently asserted in the ITC." Paper 9 at 16. But Onesta moved for termination of the ITC Investigation as to claim 9 of the '803 patent, and the ALJ granted that motion on December 2, 2025, a full 20 days before Patent Owner filed its brief in support of discretionary denial. EX1052-ITC-Motion-to-Terminate; EX1059-ITC-Order-No.16.

instituted and proceeds to a final written decision—institution is the only way to ensure efficient resolution of patentability issues as to *all* challenged claims.

Second, the merits of the Petition weigh heavily against discretionary denial, and thus, the Petition should be referred to a panel for further consideration and to decide whether the challenged claims of the ’803 patent are unpatentable.

II. THE *FINTIV* FACTORS DO NOT SUPPORT DISCRETIONARY DENIAL

Patent Owner’s brief raises arguments for discretionary denial under the *Fintiv* factors only.³ *Apple Inc. v. Fintiv, Inc.*, IPR2020-00019, Paper 11 at 6 (P.T.A.B. Mar. 20, 2020) (precedential) (“*Fintiv*”). But the *Fintiv* factors do not support discretionary denial.

A. The Petition Should Be Referred Because the ITC Investigation Will Not Resolve All Patentability Issues Raised in the Petition (*Fintiv* Factors 1-5).

Patent Owner spends page after page discussing the schedule for the ITC Investigation, but tellingly few words addressing the substantive overlap (or lack

³ Patent Owner does not—nor could it—raise any argument about settled expectations for the ’803 patent. The ’803 patent issued in December 2023 to AMD, who assigned it within a year of issuance to Onesta. EX1001-’803. Onesta then sued NVIDIA within a matter of months. *See* EX1023-ITC-Complaint; EX1024-District-Court-Complaint.

thereof) between the issues raised in the Petition and the ITC Investigation. Indeed, Patent Owner's brief never even discusses (1) challenged claim 9, which is not at issue in the ITC Investigation, or (2) Petitioner's *Sotera* stipulation—a factor “highly relevant” to the *Fintiv* analysis. See EX2119.

1. The ITC Investigation Will Not Resolve All Patentability Issues Raised in the Petition (*Fintiv* Factors 1 and 4).

Fintiv factors 1 and 4 consider “whether the court granted a stay or evidence exists that one may be granted if a proceeding is instituted” and “overlap between issues raised in the petition and in the parallel proceeding.” *Fintiv* at 5-6. The Board has recognized that where, as here, a District Court case is stayed pending an ITC Investigation, the “focus should be on ‘whether the patentability disputes before the ITC will resolve all or substantially all of the patentability disputes between the parties, regardless of the stay,’” which renders Factor 1 “neutral” and “elevates the importance of factor four.” *Samsung Elecs. Co., Ltd., v. SiOnyx, LLC*, IPR2024-01431, Paper 21 at 12-13 (P.T.A.B. Apr. 10, 2025) (“*SiOnyx*”) (quoting *Fintiv* at 9); see also *Klein Tools, Inc. v. Milwaukee Elec. Tool Corp. & Keter Home and Garden Prods., Ltd.*, IPR2024-01400, Paper 17 at 14-15 (P.T.A.B. Apr. 8, 2025) (“*Klein*”); *Posco Co., Ltd. v. Arcelormittal*, IPR2024-01376, Paper 11 at 13 (P.T.A.B. Mar. 18,

2025) (“*Posco*”).⁴ These factors favor referral.

First, the ITC cannot invalidate patent claims. After the ITC investigation, the parties are likely to continue their dispute over the ’803 patent in the District Court matter. It will be far more efficient to have the Board resolve the issues raised in the Petition as opposed to having the ITC, and then, the District Court do so. *See, e.g., Tesla, Inc. v. U.S. Sec’y of the Navy*, IPR2025-00341, Paper 12, 2-3 (June 13, 2025); *Shenzhen Tuozhu Tech. Co., Ltd. v. Stratasy, Inc.*, IPR2025-00438, -00531, -00532, -00585, -00611, Paper 10, 3 (July 17, 2025).

Second, even if the ITC could resolve patentability issues (it cannot), the ITC will not resolve all or substantially all the patentability disputes raised in the Petition

⁴ For this reason, Patent Owner’s wholesale dismissal of any relevance of the District Court case in the *Fintiv* analysis (Paper 9 at 6-7) is misguided and an incorrect interpretation of the Board’s practice, particularly where (as here) there is not complete overlap in the claims asserted in the ITC Investigation and District Court matter and challenged by the Petition. *See Fintiv* at 8-9 (noting that “it is difficult to maintain a district court proceeding ***on patent claims*** determined to be invalid at the ITC”). As explained in more detail below, there are significant points of divergence in the claims and issues to be resolved in the pending matters. *See supra* pp. 6-21.

because there is not a complete overlap of claims. There are significant areas of divergence in the issues raised in the Petition, the ITC Investigation, and the District Court matter, and Patent Owner has already engaged in serial narrowing of its asserted claims in the ITC investigation, including to drop a claim (claim 9) at issue in the Petition—a fact Patent Owner omits in its brief. *See supra* n.2. The Petition challenges the patentability of claims 1-4 and 7-10. Claims 4 and 9 are not asserted in the ITC investigation.

Patent Owner's brief acknowledges that **claim 4** is not asserted in the ITC, but dismisses it as a dependent claim with “the same limitations” as claims 1 and 3. Paper 9 at 17. That argument does not square with the doctrine of claim differentiation and ignores the difference in the dependent claim, which is the requirement of a **third GPU chiplet**, which is not present in any other claim asserted in the ITC Investigation:

4. The system of claim 3, further comprising:

a **third GPU chiplet** communicably coupled to the first GPU chip let via the passive crosslink, wherein the **third GPU chiplet** comprises a third PHY region including conductor structures for chiplet-to-chiplet communications.

EX1001-'803 at claim 4. As explained in the Petition, Kelleher and Collins explicitly teach the use of a third GPU chiplet in exactly the manner described in the '803 patent. Paper 3 at 58-61. Given that no other claim asserted in the ITC

Investigation requires the claimed third GPU chiplet, the issue raised in the Petition regarding the patentability of claim 4 will not and could not be resolved by that proceeding even assuming that the ITC could resolve any patentability issues (it cannot).

With respect to **claim 9**, as explained above, Patent Owner's brief incorrectly implies that claim 9 is still being asserted in the ITC Investigation. *See supra* n.2. It is not—the ALJ terminated the investigation as it relates to that claim at Patent Owner's request. *See* EX1059-ITC-Order-No.16. Claim 9 depends from claim 8, which in turn depends from claim 1. EX1001-'803. Claims 1 and 8 are currently asserted in the ITC Investigation, but claim 9 adds the requirement of a unified cache memory coherent across GPU chiplets:

9. The system of claim 8, further comprising:

a ***unified cache memory*** including both a last level of the first cache memory hierarchy and a last level of the second cache memory hierarchy, wherein the ***unified cache memory is coherent across all GPU chiplets*** of the GPU chiplet array.

EX1001-'803 at claim 9. As the Petition explains, the prior art teaches the use of a unified cache memory that is coherent across all GPU chiplets. Paper 3 at 98-103.

The unique limitations of dependent claims 4 and 9 will not be addressed at all by the invalidity arguments presented at the ITC. This “weighs against exercising discretion to deny institution.” *Samsung Display Co. v. Pictiva Displays Int'l Ltd.*,

IPR2024-01222, Paper 12, at 8 (Mar. 6, 2025); *see also Savant Techs. LLC v. Feit Elec. Co.*, IPR2024-01357, Paper 17, at 14 (Mar. 5, 2025).

Furthermore, in the District Court matter, Onesta has not said which specific claims it will assert against NVIDIA and may ultimately assert all the claims challenged in the Petition. The complaint in the District Court matter alleges that NVIDIA's GPUs "infringe one or more claims of the '803 Patent, ***including but not limited to*** claim 1." EX1024-District-Court-Complaint, ¶ 78 (emphasis added). Since the District Court matter is stayed pending resolution of the ITC Investigation, if the Petition is not instituted, Onesta may assert these claims without fear of review by either the ITC or the PTAB. This concern is only amplified by the fact that Onesta has agreed that it will drop more challenged claims from the ITC Investigation ahead of any hearing. Onesta has already made serial requests to do so in just the first few months of the investigation. *See* EX1060-ITC-Order-No.9, EX1061-ITC-Order-No.11, EX1059-ITC-Order-No.16. Again, Onesta will be free to re-raise any dropped claims in the District Court matter, essentially getting a second bite at the apple to try to prove infringement, and the patentability of those claims will still need to be resolved. *See Klein* at 18-19 (existence of claims challenged in Petition but not asserted in ITC Investigation "weighs heavily against discretionary denial").

Third, as to the substantive Grounds raised in the Petition, given Petitioner's *Sotera* stipulation, the only way to guarantee efficiency of adjudication is through

institution. Petitioner's *Sotera* stipulation ensures that, if this IPR is instituted and proceeds to final written decision, Petitioner will not pursue in the ITC Investigation or District Court matter either the specific Grounds raised in the Petition or any other ground that could reasonably have been raised before the Board in that instituted proceeding with respect to the '803 patent (i.e., any other ground that could have reasonably been raised under 35 U.S.C. §§102 or 103 on the basis of prior art patents or printed publications). EX1051. As Office guidance explains, "a timely-filed *Sotera* stipulation ... is highly relevant[.]" EX2116. Indeed, where Petitioners have made *Sotera* stipulations, this weighs "strongly" against discretionary denial. *E.g.*, *Stingray Grp. Inc. and Stingray Music USA, Inc. v. Edwin A. Hernandez-Mondragon*, IPR2025-00350, Paper 18, at 7-8 (P.T.A.B. June 13, 2025) (instituting IPR); *Cisco Sys., Inc. v. WSOU Invs. d/b/a Brazos Licensing & Dev.*, IPR2025-00188, Paper 10, at 16-17 (P.T.A.B. June 13, 2025) (same) ("*Cisco*"). If the IPR is not instituted, the parties, ITC, and District Court will waste resources and there still may be inconsistent results as between the ITC Investigation and District Court matter because any decision by the ITC is not binding on the District Court. But if the IPR is instituted, there is no risk of inconsistency as to patentability of the challenged claims based on prior art patents or printed publications because those issues will be decided only in this proceeding.

2. The Nature and Timing of the ITC Investigation Do Not

Support Discretionary Denial (*Fintiv* Factors 2, 3, 5).

Fintiv factors 2, 3, and 5 consider the “proximity of the court’s trial date to the Board’s projected statutory deadline for a final written decision,” “investment in the parallel proceeding by the court and the Parties,” and “whether the petitioner and the defendant in the parallel proceeding are the same party.” *Fintiv* at 5-6. Patent Owner suggests these factors weigh “heavily” in favor of denial, but cites no order in support of that conclusion. To the contrary, in similar situations, the Board has found such facts to be neutral or favor dismissal (but not “heavily” so). *See, e.g., SiOnyx* at 13-14, 16; *Klein* at 15-16. And there are further mitigating facts here.

First, it is not a foregone conclusion that the ITC Investigation will be completed prior to the FWD. Given that there is a 60-day Presidential review period in the ITC, *see* 19 U.S.C. § 1337(j), ITC ALJs frequently extend the target date for a final decision, *see* EX2101 at n.3 (noting that “some extension of the target date may be needed”), and the PTAB frequently issues FWDs **prior to** the statutory deadline, the decision in the ITC Investigation may well issue after or at approximately the same time as the FWD and both decisions will likely be on a similar appellate timeline. This likelihood mitigates *Fintiv* factor 2.

Second, Petitioner acted diligently to file the Petition well before the statutory deadline, just six months after suit was filed. This fact mitigates *Fintiv* factor 3. *See Klein* at 16; *Volkswagen Grp. of Am., Inc. v. Arigna Tech., Ltd.*, IPR2021-01321,

Paper 10 (Feb. 15, 2022) (instituted); *Apple Inc. v. AliveCor, Inc.*, IPR2021-00972, Paper 10 (Dec. 8, 2021) (instituted); *Ocado Grp. PLC v AutoStore Tech. AS*, IPR2021-00311, Paper 11 (June 28, 2021) (instituted).

Third, Patent Owner concedes that the District Court matter is stayed and there has been essentially no investment to date in that proceeding. Paper 9 at 6-7. As explained above, Patent Owner's suggestion that the ITC Investigation renders the District Court matter irrelevant is incorrect because (1) the ITC Investigation cannot resolve invalidity and (2) regardless of what happens, there are currently at least two challenged claims that are not even asserted in the ITC Investigation, but which may be asserted in the District Court. *See supra* n.2. In that proceeding, NVIDIA has not answered the complaint, no schedule has been set, no discovery has been taken, and there is no trial date set. EX1062-District-Court-Docket. With respect to at least challenged claims 4 and 9 and their unique limitations, the FWD would issue long before any trial addressing their patentability. This fact further mitigates *Fintiv* factors 2 and 3.

* * *

On balance, *Fintiv* factors 1-5 favor referral because of the significant efficiencies to be gained by having this proceeding as the sole pathway for adjudication of the patentability of all the challenged claims based on prior art patents and printed publications.

B. The Petition Should Be Referred Because of Strength of the Petition and the Compelling Interests at Stake (*Fintiv* Factor 6).

Fintiv factor 6 considers “other circumstances that impact the Board’s exercise of discretion, including the merits.” *Fintiv*, at 6. In addition, the March 26, 2025 Interim Processes for PTAB Workload Management Memorandum makes clear that considerations regarding “[t]he strength of the unpatentability challenge” and “[c]ompelling economic ... or national security interests” are relevant to the discretionary denial decision. Memorandum from Coke Morgan Stewart, Acting Director of USPTO, to All PTAB Judges, *Interim Processes for PTAB Workload Management* at 2-3 (Mar. 26, 2025) (“Interim Processes Memorandum”). Both weigh heavily in favor of referral.

1. The Petition Presents Strong Evidence of Unpatentability, Favoring Referral.

The Petition shows that the limitations of the challenged claims were known long before the ’803 patent’s filing date. And *none* of the prior art in the Grounds was considered by the Patent Office during prosecution. Paper 3 at 3.

For example, the Kelleher and Sistla references presented in the Grounds were both published well over a decade before the filing date of the ’803 patent and the Collins and Koker references were published months before. Indeed, the ’803 patent itself acknowledges that chiplets have been used in CPU architectures, but asserts without merit that this is novel for GPU architectures. EX1001-’803 at 1:46-51. But

as the Kelleher reference shows, NVIDIA itself disclosed a system with multiple GPU chiplets viewed by the CPU as a single GPU, a cross-link for communication among chiplets, and a bus for connecting a CPU to a single chiplet. *See, e.g.*, Paper 3 at 2-3, 14-18. As the Petition explains, each and every limitation of the challenged claims was well-known in the art. In fact, Patent Owner does not even attempt to argue that the Petition lacks merit, but merely defers to its POPR, which will not be filed before the decision on referral. Paper 9 at 19. Where the merits of a petition are strong and based on prior art not considered by the Patent Office during prosecution, *Fintiv* factor 6 “weighs strongly” in favor of referral. *E.g.*, *Cisco* at 18-22.

2. Compelling Public Interests Favor Referral.

NVIDIA's “Blackwell” architecture chips—including the GB200 chip that Onesta accuses of infringement in the ITC Investigation and District Court matter—are a vital ingredient for AI development. NVIDIA GPUs are the highest performing GPUs on the market. The GB200 is 30 times more powerful than the previous H100, is in high demand, and is relied upon by leading U.S. companies that provide services across the economy such as Microsoft, Google, Amazon, Meta, and Oracle. EX1064-GB200-NVL72; EX1065-Drury. This Petition provides the Board with exactly the sort of compelling reasons to refer the Petition on to a panel for further review on the merits.

In fact, AMD—the original applicant and previous owner of the '803 patent—apparently agrees. In a submission to the ITC in another proceeding in which AMD GPUs are at issue, AMD explained that “U.S. competitiveness in AI and applied research hinges on computing power. AI and the advanced-computing capacity that enables it are now strategic capabilities for the U.S.” that underpin “U.S. national security, strengthen[] economic competitiveness, and advance[] public-health and safety missions.” EX1058-ITC-AMD-PI-Statement at 2-3. AMD further warned that exclusion of its GPUs would “disrupt the United States’s computing infrastructure, degrade U.S. research capacity, impair competitive conditions, and harm ... consumers” as well as “curtail the frontier-scale compute the United States has deemed essential, undermine sovereign AI capabilities, impair national-security and public-health missions, and set back the nation’s strategic goals for AI leadership.” EX1058-ITC-AMD-PI-Statement at 2-3.

Patent Owner’s brief does not deny that it seeks to exclude from the U.S. market NVIDIA’s critical GPUs based on the invalid '803 patent. Instead, it points to a statement by the DOJ and Patent Office filed in an unrelated ITC investigation relating to the public’s interest in enforcement of patent rights. Paper 9 at 19-20. But the statement is inapposite. For one, it relates to a different question, which is the ITC’s application of public interest factors, not the Patent Office’s assessment of discretionary denial. And for another, Petitioner is raising particularized concerns

about “compelling economic ... or national security interests” pursuant to the Interim Processes Memorandum, not the kind of general appeal to private interests addressed in the cited Joint Comment. Similarly, Patent Owner cites a decision in *Taiwan Semiconductor Mfg. Co. Ltd., et. al v. Marlin Semiconductor Ltd.*, IPR2025-00864, Paper 11 at 3 (P.T.A.B. Sept. 3, 2025), but there the issue was that the Petitioner had “not narrowly-tailored” its arguments to “particular products” or explain why “national security, economic, or public interests warrant review of the specific patents challenged in these proceedings.” Here, again, Petitioner has identified specific products, such as NVIDIA’s “Blackwell” GPUs, and has explained why the Board’s review is appropriate in view of the Patent Owner’s assertion of unpatentable claims.

III. RESERVATION OF RIGHTS

Petitioner hereby preserves the argument that the discretionary denial procedures adopted by the Director without notice and comment rulemaking are improper and contrary to law because they violate the Due Process Clause of the Constitution and the Administrative Procedure Act.

IV. CONCLUSION

Patent Owner’s request for discretionary denial should be denied.

Respectfully Submitted,

Dated: January 22, 2026

/Grant K. Rowan/
Grant K. Rowan (Reg. No. 41,278)

Petitioner's Updated Table of Exhibits

Exhibit	Description
1001	U.S. Patent No. 11,841,803 ("803 patent")
1002	Declaration of Dr. Vivek Subramanian Regarding U.S. Patent No. 11,841,803 ("Decl.")
1003	File History for U.S. Patent No. 11,841,803 ("FH")
1004	U.S. Patent No. 7,598,958 ("Kelleher")
1005	U.S. Patent No. 11,610,862 ("Collins")
1006	Coskun et. al, A Cross-Layer Methodology for Design and Optimization of Networks in 2.5D Systems, PROCEEDINGS OF THE INTERNATIONAL CONFERENCE ON COMPUTER-AIDED DESIGN (2018) ("Coskun")
1007	RESERVED
1008	Jerger et al., NoC Architectures for Silicon Interposer Systems, IEEE/ACM INTERNATIONAL SYMPOSIUM ON MICROARCHITECTURE (2015) ("Jerger")
1009	RESERVED
1010	John Lau, Heterogeneous Integrations, Springer (2019) ("Lau")
1011	Ajaykumar Kannan, Enabling Interposer-Based Disintegration of Multi-Core Processors, University of Toronto Department of Electrical & Computer Engineering (2015) ("Kannan")
1012-1013	RESERVED
1014	International Patent Publication No. WO2019132971 ("Elsherbini")
1015-1019	RESERVED
1020	Dylan Stow, et. al., Cost-Effective Design of Scalable High-Performance Systems Using Active and Passive Interposers, IEEE/ACM INTERNATIONAL CONFERENCE ON COMPUTER-AIDED DESIGN (ICCAD) (2017) ("Stow")
1021	The Open Domain-Specific Architecture WorkGroup, A Chiplet-Based Open Architecture, Draft v0.9 (2018) ("ODSA")
1022	Ugljesa Milic et. al., BEYOND THE SOCKET: NUMA-AWARE GPUS, <i>in</i> PROCEEDINGS OF MICRO-50 (2017) ("Milic")
1023	Complaint, <i>In the Matter of</i> CERTAIN INTEGRATED CIRCUITS, ELECTRONIC DEVICES CONTAINING THE SAME, AND COMPONENTS THEREOF, Inv. No. 337-TA-1450 ("ITC-Complaint")

Petitioner's Brief In Opposition to Discretionary Denial
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1024	Complaint, <i>Onesta IP, LLC v. NVIDIA Corp</i> , No. 1:25-cv-00586 (W.D. Tex.) (“District-Court-Complaint”)
1025	ITC Exhibit 50, <i>In the Matter of</i> CERTAIN INTEGRATED CIRCUITS, ELECTRONIC DEVICES CONTAINING THE SAME, AND COMPONENTS THEREOF, Inv. No. 337-TA-1450 (“ITC-Ex50-Infringement”)
1026	ITC Exhibit 19, <i>In the Matter of</i> CERTAIN INTEGRATED CIRCUITS, ELECTRONIC DEVICES CONTAINING THE SAME, AND COMPONENTS THEREOF, Inv. No. 337-TA-1450 (“ITC-Ex19-Domestic-Industry”)
1027	U.S. Patent Publication No. 2019/0123022 (“Teig”)
1028	Paul Enquist, Room Temperature Direct Wafer Bonding for Three Dimensional Integrated Sensors, SENSORS AND MATERIALS, Vol. 17, No. 6 (2005) (“Ziptronix”)
1029	Robert R. Schaller, Moore’s Law: Past, Present, and Future, IEEE SPECTRUM (June 1997) (“Schaller”)
1030	Yangdong (Steven) Deng & Wojciech Maly, 2.5D System Integration: A Design Driven System Implementation Schema, IEEE (2004) (“Deng-&-Maly”)
1031	U.S. Patent No. 10,909,652 (“Koker”)
1032	RESERVED
1033	Akhil Arunkumar et. al, MCM-GPU: Multi-Chip-Module GPUs for Continued Performance Scalability <i>in Proceedings of ISCA '17</i> (June 2017) (“Arunkumar”)
1034	Dictionary of Computer Science (7th ed.), Oxford University Press (2016) (“Dictionary-of-Computer-Science”)
1035	Dictionary of Multimedia (4th ed.), Franklin, Beedle & Associates Inc. (2005) (“Dictionary-of-Multimedia”)
1036	Joel Mearig & Bill Goers, An Overview of Manufacturing BGA Technology, IEEE/CPMT Int’l Electronics Manufacturing Technology Symposium (1995) (“Mearig-&-Goers”)
1037	U.S. Patent Publication No. 2018/0240778 (“Liu”)
1038	Farhang Yazdani, Design and Direct Assembly of 2.5D/3D Rigid Silicon Interposer on PCB, IMAPS Proceedings (2014) (“Yazdani”)
1039	RESERVED
1040	U.S. Patent Publication No. 2001/0005873 (“Yasuda”)
1041	U.S. Patent No. 10,475,147 (“Price”)

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1042	U.S. Patent Publication No. 2007/0273699 ("Sasaki")
1043	Amended Joint Proposed Claim Construction Chart, <i>In the Matter of</i> CERTAIN INTEGRATED CIRCUITS, ELECTRONIC DEVICES CONTAINING THE SAME, AND COMPONENTS THEREOF, Inv. No. 337-TA-1450 ("Claim-Construction-Chart")
1044	Chris McClanahan, History and Evolution of GPU Architecture, Georgia Tech. (2010) ("McClanahan")
1045	Thiruvengadam Vijayaraghavan et.al, Design and Analysis of an APU for Exascale Computing, IEEE International Symposium on High Performance Computer Architecture (2017) ("Vijayaraghavan")
1046	NVIDIA Tesla P100, Whitepaper, The Most Advanced Datacenter Accelerator Ever Built Featuring Pascal GP100, the World's Fastest GPU (2016) ("NVIDIA-P100")
1047	U.S. Patent Publication No. 2009/0037658 ("Sistla")
1048	Raman Nayyar, "Performance Analysis of a Hierarchical, Cache-Coherent, Shared Memory Based, Multi-processor System" (1993) ("Nayyar")
1049	Rajeev Balasubramonian et. al, "Multi-Core Cache Hierarchies," Morgan & Claypool Publishers (2011) ("Balasubramonian")
1050	Reza Ghaffarian, Book of Knowledge (BOK) for NASA Electronic Packaging Roadmap (2015) ("Ghaffarian")
1051	Notice of Petitioner's <i>Sotera</i> Stipulation
1052	Motion to Terminate, <i>In the Matter of</i> CERTAIN INTEGRATED CIRCUITS, ELECTRONIC DEVICES CONTAINING THE SAME, AND COMPONENTS THEREOF, Inv. No. 337-TA-1450 ("ITC-Motion-to-Terminate")
1053	RESERVED
1054	Rob Wile, How Nvidia Grew to A Trillion-Dollar Company Fueling the AI Revolution, NBC News (Feb. 24, 2024), https://www.nbcnews.com/business/business-news/what-is-nvidia-what-dothey-make-ai-artificial-intelligence-rcna140171 ("Wile")
1055	NVIDIA Blackwell Architecture Technical Brief ("Blackwell-Tech.Br.")
1056-1057	RESERVED

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1058	AMD Public Interest Statement, <i>In the Matter of</i> CERTAIN SEMICONDUCTOR DEVICES, COMPUTING PRODUCTS CONTAINING THE SAME, AND COMPONENTS THEREOF, Inv. No. 337-TA-3855 November 28, 2025 (“ITC-AMD-PI-Statement”)
1059	Order No. 16, <i>In the Matter of</i> CERTAIN INTEGRATED CIRCUITS, ELECTRONIC DEVICES CONTAINING THE SAME, AND COMPONENTS THEREOF, Inv. No. 337-TA-1450 (“ITC-Order-No.16”)
1060	Order No. 9, <i>In the Matter of</i> CERTAIN INTEGRATED CIRCUITS, ELECTRONIC DEVICES CONTAINING THE SAME, AND COMPONENTS THEREOF, Inv. No. 337-TA-1450 (“ITC-Order-No.9”)
1061	Order No. 11, <i>In the Matter of</i> CERTAIN INTEGRATED CIRCUITS, ELECTRONIC DEVICES CONTAINING THE SAME, AND COMPONENTS THEREOF, Inv. No. 337-TA-1450 (“ITC-Order-No.11”)
1062	Docket, <i>Onesta IP, LLC v. NVIDIA Corp</i> , No. 1:25-cv-00586 (W.D. Tex.) (“District-Court-Docket”)
1063	RESERVED
1064	NVIDIA GB200 NVL72, NVIDIA, https://www.nvidia.com/en-us/data-center/gb200-nvl72/ (“GB200-NVL72”)
1065	Keithen Drury, 1 Jaw-Dropping Projection That Makes Nvidia a Screaming Buy (Oct. 6, 2025), https://www.fool.com/investing/2025/10/06/1-jaw-dropping-projection-that-makes-nvidia-a-scre/ (“Drury”)

CERTIFICATE OF SERVICE

I hereby certify that on January 22, 2026, I caused a true and correct copy of the foregoing materials:

- Petitioner's Brief in Opposition to Discretionary Denial
- Exhibit List
- Exhibits for Petitioner's Brief in Opposition to Discretionary Denial (EX1052, EX1054-EX1055, EX1058-EX1062, EX1064-EX1065)

to be served via electronic mail to:

- WAMeunier@mintz.com
- ARizk@mintz.com
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Respectfully Submitted,

/Sarah J. Murphy/

Sarah J. Murphy (Reg. No. 80,104)