

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

REED SEMICONDUCTOR CORP.,

Plaintiff,

v.

MONOLITHIC POWER SYSTEMS,
INC.,

Defendant.

Case No. 6:25-cv-00449-ADA-DNM

MPS'S PRELIMINARY INVALIDITY CONTENTIONS

Defendant Monolithic Power Systems, Inc. ("MPS" or "Defendant") hereby provides the following Preliminary Invalidity Contentions ("Contentions") to Plaintiff Reed Semiconductor Corp. ("Reed" or "Plaintiff") for U.S. Patent 7,960,955 (the "'955 patent") (the "Asserted Patent").

I. PRELIMINARY STATEMENT AND RESERVATION OF RIGHTS

In its Infringement Contentions dated December 8, 2025, Reed asserted the following claims (the "Asserted Claims"): Claims 1, 2, 7, 8, and 9 of the '955 patent. MPS does not provide any Contentions directed to claims that Reed has not asserted for purposes of infringement. To the extent Reed may be permitted to assert additional claims in the future, MPS reserves all rights to disclose new or supplemental contentions regarding such claims.

Because the same claim scope must apply for both infringement and invalidity, these Contentions are based on Reed's assertions in its Infringement Contentions. MPS does not thereby implicitly or explicitly agree with Reed's construction of the claims. MPS reserves all rights to disclose new or supplemental invalidity contentions, including to address any construction of the

A. Lack of Written Description and Enablement Under 35 U.S.C. § 112 ¶ 1

Certain claims in the Asserted Patent are invalid for lack of written description. Section 112 requires that a patent specification “contain a written description . . . of the manner and process of making and using [the invention] in such full, clear, concise and exact terms as to enable any person skilled in the art to which it pertains, or with which it is most nearly connected, to make and use the same.” 35 U.S.C. § 112 ¶ 1. A patent’s written description “must clearly allow persons of ordinary skill in the art to recognize that [the inventor] invented what is claimed.” *Ariad Pharms., Inc. v. Eli Lilly & Co.*, 598 F.3d 1336, 1351 (Fed. Cir. 2010) (en banc). The disclosure must “convey to those skilled in the art that the inventor had possession of the claimed subject matter as of the filing date.” *Id.* The level of detail required to satisfy the written description requirement varies depending on the nature and scope of the claims and on the complexity and predictability of the relevant technology, but a “mere wish or plan” for obtaining the alleged invention does not satisfy the written description requirement. *Novozymes A/S v. DuPont Nutrition Biosciences APS*, 723 F.3d 1336, 1344 (Fed. Cir. 2013). Put another way, “a description that merely renders the invention obvious does not satisfy the requirement.” *Ariad*, 598 F.3d at 1351. Instead, “all the limitations must appear in the specification.” *Lockwood v. Am. Airlines, Inc.*, 107 F.3d 1565, 1572 (Fed. Cir. 1997). MPS contends that, at least under Reed’s actual and/or apparent application of the claims, the specification of the Asserted Patent does not include a sufficient written description supporting the claims. Moreover, MPS contends that Reed’s actual and/or apparent application of the Asserted Claims covers a broader scope than is justified and/or supported by the written description provided in the specification of the Asserted Patent. *Tronzo v. Biomet, Inc.*, 156 F.3d 1154, 1159 (Fed. Cir. 1998); *LizardTech, Inc. v. Earth Res. Mapping, Inc.*, 424 F.3d 1336, 1346 (Fed. Cir. 2005); *ICU Med., Inc. v. Alaris Med. Sys., Inc.*, 558 F.3d 1368 (Fed. Cir. 2009).

Section 112 likewise requires that the specification “enable any person skilled in the art to which it pertains, or with which it is most nearly connected, to make and use the” alleged invention. 35 U.S.C. § 112 ¶ 1. A claim is not enabled if, “at the effective filing date of the patent, one of ordinary skill in the art could not practice their full scope without undue experimentation.” *Wyeth and Cordis Corp. v. Abbott Labs.*, 720 F.3d 1380, 1384 (Fed. Cir. 2013). “This important doctrine prevents both inadequate disclosure of an invention and overbroad claiming that might otherwise attempt to cover more than was actually invented.” *MagSil Corp. v. Hitachi Global Storage Techs., Inc.*, 687 F.3d 1377, 1381 (Fed. Cir. 2012). MPS contends that, at least under Reed’s actual and/or apparent application of the claims, the specification of the Asserted Patent does not enable any person skilled in the relevant art to make and use the alleged inventions of the Asserted Claims without undue experimentation.

Furthermore, under Reed’s actual and/or apparent application of the claims, the specification of the Asserted Patent does not enable the broad scope of the Asserted Claims as Reed asserts. MPS contends that Reed’s actual and/or apparent application of the Asserted Claims covers a broader scope than is justified, and certainly broader than is enabled in the specification. As explained below, the specification of the Asserted Patent has not enabled a person of ordinary skill in the art at the time of the alleged invention to perform the full scope of all Asserted Claims.

Each of the Asserted Claims below are invalid because, at least to the extent Reed contends any of the following limitations should be construed to encompass MPS’s accused instrumentalities, the specification fails to provide written description and/or an enabling disclosure of at least the following limitations of the ’955 patent:

- “a switching power supply which stabilizes the input voltage”;
- “a reference voltage source which generates a predetermined reference voltage”;

- “a linear regulator which stabilizes the input voltage, based on the reference voltage generated by the reference voltage source”;
- “an output voltage of the linear regulator is supplied as a power supply voltage of a controller of the switching power supply and the reference voltage source, and the input voltage is not directly supplied to the controller as a power supply voltage”;
- “configured to enable switching of a regulation mode in which a voltage is outputted according to the reference voltage, and a bypass mode in which the input voltage is outputted as it is, with no relation to the reference voltage”;
- “when the power supply apparatus is started up, the linear regulator operates in the bypass mode, during a time period until the reference voltage reaches a predetermined voltage value, and when the reference voltage exceeds the predetermined voltage value, operates in the regulation mode”;
- “the reference voltage source, the linear regulator, and the controller of the switching power supply are integrated on one semiconductor substrate”;
- “the switching power supply is a step-up switching regulator which steps up the input voltage”;
- “the power supply apparatus according to claim 8, which has voltage of the battery as an input voltage, and steps up the voltage to supply the load circuit.”

B. Indefiniteness Under 35 U.S.C. § 112 ¶ 2

35 U.S.C. § 112, ¶ 2 requires that a patent claim “particularly point[] out and distinctly claim[] the subject matter which the applicant regards as his invention.” 35 U.S.C. § 112, ¶ 2. Claim terms that fail to inform those skilled in the art “with reasonable certainty . . . about the scope of the invention” fail the definiteness requirement of 35 U.S.C. § 112, ¶ 2. *Nautilus, Inc. v.*

Biosig Instruments, Inc., 572 U.S. 898, 901 (2014). MPS contends that, at least under Reed’s actual and/or apparent application of the claims, the Asserted Claims of the Asserted Patent fail to distinctly claim what the inventors regard as their alleged invention.

Each of the Asserted Claims are invalid as indefinite under 35 U.S.C. § 112 because they fail to particularly point out and distinctly claim the subject matter which the applicant regards as his invention. In particular, the following limitations of the ’955 patent, read in light of the intrinsic evidence, fail to inform those skilled in the art with reasonable certainty about the scope of the claimed inventions, at least under Reed’s apparent interpretation of the claims:

- “a switching power supply which stabilizes the input voltage”;
- “a reference voltage source which generates a predetermined reference voltage”;
- “a linear regulator which stabilizes the input voltage, based on the reference voltage generated by the reference voltage source”;
- “an output voltage of the linear regulator is supplied as a power supply voltage of a controller of the switching power supply and the reference voltage source, and the input voltage is not directly supplied to the controller as a power supply voltage”;
- “configured to enable switching of a regulation mode in which a voltage is outputted according to the reference voltage, and a bypass mode in which the input voltage is outputted as it is, with no relation to the reference voltage”;
- “when the power supply apparatus is started up, the linear regulator operates in the bypass mode, during a time period until the reference voltage reaches a predetermined voltage value, and when the reference voltage exceeds the predetermined voltage value, operates in the regulation mode”;

- “the reference voltage source, the linear regulator, and the controller of the switching power supply are integrated on one semiconductor substrate”;
- “the switching power supply is a step-up switching regulator which steps up the input voltage”;
- “the power supply apparatus according to claim 8, which has voltage of the battery as an input voltage, and steps up the voltage to supply the load circuit.”

VI. DOCUMENT PRODUCTION

Pursuant to the scheduling order, MPS is concurrently producing the prior art identified in these Invalidity Contentions.

In addition, based on investigations to date, MPS is concurrently producing technical documentation sufficient to show the operation of the Accused Products.

MPS reserves the right to supplement these productions with additional documentation, in accordance with the Federal Rules of Civil Procedure, the Local Rules, the Court’s orders and other applicable rules and statutes.

DATED: February 5, 2026

Respectfully submitted,

BY: /s/ Thomas W. Yeh

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on February 5, 2026, a true and correct copy of the foregoing was served on counsel of record for Plaintiff as shown below:

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