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July 30, 2021

VIA EDIS

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

Re: *Certain Laptops, Desktops, Servers, Mobile Phones, Tablets, and Components Thereof*, Investigation No. 337-TA-_____

Dear Secretary Barton:

Enclosed for filing on behalf of Complainant Sonrai Memory Limited are documents in support of Complainant's request that the Commission commence an investigation pursuant to Section 337 of the Tariff Act of 1930, as amended, concerning certain power inverters and converters, vehicles containing the same, and components thereof. A request for confidential treatment of Confidential Exhibits **10C-12C** and **27C** is also being submitted.

In accordance with the Commission's Temporary Change to the Filing Procedures dated March 16, 2020 ("Temporary Procedures"), and the guidance provided on the Commission's "COVID-19-RELATED QUESTIONS" webpage, Complainant submits the following documents for filing via EDIS:

1. A Statement on the Public Interest with respect to the remedial orders Complainant seeks in the Complaint, pursuant to Commission Rule 210.8(b).
2. One (1) electronic copy of Complainant's Verified Complaint pursuant to Commission Rule 210.8(a)(1)(i);
3. One (1) electronic copy of the non-confidential exhibits to the Complaint, pursuant to Commission Rule 210.8(a)(1)(i);
4. One (1) electronic copy of the confidential exhibits to the Complaint, pursuant to Commission Rules 201.6(c) and 210.8(a)(1)(ii);
5. One (1) electronic certified copy of United States Patent Nos. 7,159,766, 7,325,733, and 8,193,792, included with the Complaint as Exhibits **1-3**, pursuant to Commission Rule 210.12(a)(9)(i);
6. One (1) electronic certified copy of the U.S. Patent and Trademark Office prosecution histories for United States Patent Nos. 7,159,766, 7,325,733, and 8,193,792, included with



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the Complaint as Appendices **A1**, **B1**, and **C1**, pursuant to Commission Rule 210.12(C)(1);

7. One (1) electronic certified copy of the Assignment Records for United States Patent Nos. 7,159,766, 7,325,733, and 8,193,792, included with the Complaint as Exhibits **1-9**, pursuant to Commission Rule 210.12(a)(9)(ii), except that certified copies of Exhibits **5**, **7**, and **8** have been ordered from the U.S. Patent and Trademark Office and will be substituted for the currently provided uncertified copies when received;
8. One (1) electronic copy of each technical reference cited in the prosecution history for United States Patent Nos. 7,159,766, 7,325,733, and 8,193,792, included with the Complaint as Appendices **A2**, **B2**, and **C2**, pursuant to Commission Rule 210.12(c)(2); and
9. A letter and certification requesting confidential treatment for the information contained in Confidential Exhibits **10C-12C** and **27C** to the Complaint, pursuant to Commission Rules 201.6(b) and 210.5(d).

Thank you for your attention to this matter. Please contact me should you have any question concerning this submission.

Respectfully submitted,

Matthew D. Aichele

Enclosures

**UNITED STATES INTERNATIONAL TRADE COMMISSION
WASHINGTON, D.C.**

In the Matter of

**CERTAIN LAPTOPS, DESKTOPS,
SERVERS, MOBILE PHONES,
TABLETS, AND COMPONENTS
THEREOF**

Investigation No. 337-TA-_____

**COMPLAINT UNDER SECTION 337 OF THE
TARIFF ACT OF 1930, AS AMENDED**

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EXHIBITS

Exhibit Number	Description
1	Certified United States Patent Nos. 7,573,766 (“766 Patent”)
2	Certified United States Patent Nos. 7,868,733 (“733 Patent”)
3	Certified United States Patent Nos. 8,193,792 (“792 Patent”)
4	Certified Assignment at Reel/Frame 015319/0237 (’766)
5	Assignment at Reel/Frame 044820/0715 (’766)
6	Certified Assignment at Reel/Frame 051303/0523 (’733)
7	Assignment at Reel/Frame 022801/0523 (’792)
8	Assignment at Reel/Frame 025899/0710 (’792)
9	Certified Assignment at Reel/Frame 051799/0956 (’766, ’733, ’792)
10C	Complainant’s Identification of License Agreements
11C	Declaration of Brian Branscomb
12C	Declaration of Mei-Ling Chen
13	Receipt from Dell.com showing the purchase of Dell XPS 13
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15	Receipt from Lenovo.com showing the purchase of Lenovo ThinkPad T14
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17	Receipt from Amazon.com showing the purchase of LG V40
18	Photograph of product and/or packaging of the LG V40
19	Receipt from Amazon.com showing the purchase of LG gram 15
20	Photograph of packaging of the LG gram 15
21	Receipt from Motorola.com showing the purchase of Motorola Razr
22	Photograph of packaging of the Motorola Razr
23	Receipt from Amazon.com showing the purchase of Samsung Galaxy S20 5G
24	Photograph(s) of the Samsung Galaxy S20 5G
25	Receipt from Amazon.com showing the purchase of Samsung Galaxy Book Flex
26	Photograph(s) of product and/or packaging of the Samsung Galaxy Book Flex
27C	Microchip-Sonrai License Agreement

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28	Infringement Claim Chart for U.S. Patent No. 7,573,766 to Dell XPS 13
29	Infringement Claim Chart for U.S. Patent No. 7,573,766 to Lenovo ThinkPad T14
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31	Infringement Claim Chart for U.S. Patent No. 7,573,766 to LG gram 15
32	Infringement Claim Chart for U.S. Patent No. 7,573,766 to Motorola Razr
33	Infringement Claim Chart for U.S. Patent No. 7,573,766 to Samsung Galaxy S20 5G
34	Infringement Claim Chart for U.S. Patent No. 7,573,766 to Samsung Galaxy Book Flex
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49	Amazon.com Product Listing for Acer Spin 3 SP314-54N-314V 2 in 1 Notebook
50	Amazon.com Product Listing for ASUS VivoBook S14 S435 Thin and Light Laptop

APPENDICES

Appendix Letter	Description
A1	Certified copy of the prosecution history of U.S. Patent No. 7,573,766
A2	References cited in the prosecution history of U.S. Patent No. 7,573,766
B1	Certified copy of the prosecution history of U.S. Patent No. 7,868,733
B2	References cited in the prosecution history of U.S. Patent No. 7,868,733
C1	Certified copy of the prosecution history of U.S. Patent No. 8,193,792
C2	References cited in the prosecution history of U.S. Patent No. 8,193,792

I. INTRODUCTION

1. This Complaint is filed by Complainant Sonrai Memory Limited (“Sonrai” or “Complainant”) pursuant to Section 337 of the Tariff Act of 1930, as amended, 19 U.S.C. § 1337 (“Section 337”).

2. Complainant brings this action to remedy violations of Section 337 arising from the unlawful and unauthorized importation into the United States, the sale for importation into the United States, and/or the sale within the United States after importation, of certain laptops, desktops, servers, mobile phones, tablets, and components thereof (the “Accused Products”) that infringe one or more of the Asserted Claims of United States Patents Nos. 7,159,766 (“the ’766 Patent,” attached as Exhibit 1), 7,325,733 (“the ’733 Patent,” attached as Exhibit 2), and 8,193,792 (“the ’792 Patent,” attached as Exhibit 3) (collectively, the “Asserted Patents”).

3. Complainant asserts that the Accused Products infringe at least the following claims of one or more Asserted Patents in violation of Section 337(a)(1)(B)(i), either literally or under the doctrine of equivalents:

Asserted Patent	Asserted Claims ¹
’766 Patent	1 , 3-6, 8, 10, 13, 14 , 16-21, 25-27, 45 , 47-50, 54-56, 57 , 58, 60
’733 Patent	1 , 2-3, 6-7, 9, 11-12, 13 , 14-15, 17-18, 20-21, 22 , 23, 25
’792 Patent	1 , 2-9, 10 , 11-18

Table 1. The Asserted Claims.

4. The Proposed Respondents are Amazon.com Inc (“Amazon”); Dell Technologies Inc. and EMC Corporation (collectively, “Dell”); Google LLC (“Google”); Lenovo Group Ltd.

¹ Independent claims are in bold.

and Lenovo (United States) Inc. (collectively, “Lenovo”); LG Electronics Inc. and LG Electronics USA, Inc. (collectively, “LG”); Motorola Mobility LLC (“Motorola”); and Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. (collectively, “Samsung”) (collectively, “Proposed Respondents”).

5. As set forth in this Complaint, each of the Proposed Respondents imports into the United States, sells for importation into the United States, and/or sells in the United States after importation Accused Products that directly infringe the Asserted Patents, and/or indirectly infringe the Asserted Patents by induced or contributory infringement.

6. Complainant seeks, as relief for the unfair acts of the Proposed Respondents, the following: (i) institution of an investigation into Proposed Respondents’ violations; (ii) a public hearing; (iii) a limited exclusion order barring from entry into the United States the Accused Products that infringe one or more of the Asserted Patents; (iv) a permanent cease and desists order prohibiting the importation, sale, sale for importation, offer for sale, and soliciting of the sale in the United States, of the Accused Products that infringe one or more the Asserted Patents; (v) the imposition of a bond during the 60-day Presidential review period pursuant to 19 U.S.C. § 1337(j); and (vi) such other relief as the Commission deems proper.

7. A domestic industry exists as the result of activities and investments in the United States related to products that practice the Asserted Patents. These activities include the current and ongoing significant and substantial domestic investments in plant, equipment, labor, and capital of Sonrai’s licensee(s) Microchip Corporation (“Microchip”).

II. THE PARTIES

A. Complainant and Inventor

8. Complainant Sonrai Memory Limited is an Irish company, having its principal place of business at Suite 23, The Hyde Building, Carrickmines, Dublin 18, Ireland. Sonrai is the sole owner by assignment of all right, title, and interest in each Asserted Patent.

9. One of Sonrai's domestic licensees is Microchip Technology Inc is an American company located at 2355 W. Chandler Blvd., Chandler, Arizona 85224. Microchip is the predecessor-in-interest of each of the Asserted Patents and has a non-exclusive license to practice each of the Asserted Patents.

B. Proposed Respondents

1. Amazon

10. Amazon.com, Inc. ("Amazon") is a publicly traded corporation organized under the laws of the State of Delaware. Its principal place of business is at 410 Terry Avenue North, Seattle, Washington 98109.

11. On information and belief, Amazon imports into the United States, and/or sells within the United States after importation certain Accused Products. *See infra* Section VI.A.

2. Dell

12. Dell Technologies Inc. is a corporation organized under the laws of the State of Delaware. Its principal place of business is at One Dell Way, Round Rock, Texas 78682.

13. On information and belief, Dell designs and manufactures and/or has manufactured on its behalf abroad certain Accused Products, including in China, that are then sold for importation into the United States, imported into the United States, and/or sold within the United States after importation, including through its subsidiary EMC Corporation. *See infra* Section VI.B.

14. Dell Technologies Inc. and EMC Corporation are collectively referred to as “Dell.”

3. Lenovo

15. Lenovo Group Ltd. is a corporation organized under the laws of the People's Republic of China. Its principal place of business is at 6 Chuang ye Road, Haidian District, Beijing 100085, China.

16. Lenovo (United States) Inc. is a corporation organized under the laws of the State of Delaware. Its principal place of business is at 1009 Think Place, Building One, Morrisville, North Carolina 27560.

17. On information and belief, Lenovo Group Ltd. designs and manufactures and/or has manufactured on its behalf abroad certain Accused Products, including in China, that are then sold for importation into the United States, imported into the United States, and/or sold within the United States after importation, including through its subsidiary Lenovo (United States) Inc. *See infra* Section VI.C.

18. Lenovo Group Ltd. and Lenovo (United States) Inc. are collectively referred to as “Lenovo.”

4. LG

19. LG Electronics Inc. is a corporation organized under the laws of Korea. Its principal place of business is at LG Twin Tower 128, Yeoui-daero, Yeongdeungpo-gu, 07336, Seoul, South Korea.

20. LG Electronics USA, Inc. is a corporation organized under the laws of the State of Delaware. Its principal place of business is at 1000 Sylvan Ave, Englewood Cliffs, New Jersey 07632.

21. On information and belief, LG Electronics Inc. designs and manufactures and/or has manufactured on its behalf abroad certain Accused Products, that are then sold for importation

into the United States, imported into the United States, and/or sold within the United States after importation, including through its subsidiary LG Electronics USA, Inc. *See infra* Section VI.D.

22. LG Electronics Inc. and LG Electronics USA, Inc. are collectively referred to as “LG.”

5. Motorola

23. Motorola Mobility LLC (“Motorola”) is a limited liability company organized under the laws of the State of Delaware. Its principal place of business is at 222 W. Merchandise Mart Plaza, Suite 1800, Chicago, Illinois 60654.

24. On information and belief, Motorola Mobility LLC, a subsidiary of Lenovo Group Ltd., designs and manufactures and/or has manufactured on its behalf abroad certain Accused Products, including in China, that are then sold for importation into the United States, imported into the United States, and/or sold within the United States after importation. *See infra* Section VI.E.

6. Samsung

25. Samsung Electronics Co., Ltd. is a publicly traded corporation organized under the laws of South Korea. It has its principal place of business at 129 Samsung-Ro, Maetan-3dong, Yeongtong-gu, Suwon, 443-742, South Korea.

26. Samsung Electronics America, Inc. is a corporation organized under the laws of the State of New York. Its principal place of business is at 85 Challenger Rd., Ridgefield Park, New Jersey 07660.

27. On information and belief, Samsung Electronics Co., Ltd. produces abroad certain Accused Products that are then sold for importation into the United States, imported into the United States, and/or sold within the United States after importation, including through its subsidiary Samsung Electronics America, Inc. *See infra* Section VI.F.

28. Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. are collectively referred to as “Samsung.”

III. THE TECHNOLOGY AND PRODUCTS AT ISSUE

29. Pursuant to 19 C.F.R. §§ 210.10(b)(1) and 210.12(a)(12), the categories of products accused of infringing one or more of the Asserted Patents are laptop computers, desktop computers, servers, mobile phones, tablets, and components thereof. As shown in the table below, the category of Accused Products for each Proposed Respondent varies:

	Laptops, Desktops, and Servers	Mobile Phones and Tablets
Amazon	X	X
Dell	X	
Lenovo	X	
LG	X	X
Motorola		X
Samsung	X	X

30. Proposed Respondents infringe the Asserted Patents through the importation into the United States, the sale for importation, or the sale within the United States of such Accused Products. Exemplary identifications of such infringing products are provided in Section V below.

A. U.S. Patents Nos. 7,159,766 and 7,325,733

31. The Universal Serial Bus (USB) allows coupling of peripheral devices to a computer system. USB is a serial cable bus for data exchange between a host computer and a wide range of simultaneously accessible devices. The bus allows peripherals to be attached, configured, used, and detached while the host is in operation. For example, a card reader for reading flash memory cards may be coupled to a host computer through the USB. USB based systems may require that a USB host controller be present in the host system, and that the operating system of the host system support USB and USB Mass Storage Class Devices. A USB hub may be coupled

to a USB host controller to allow multiple USB devices to be coupled to the host system through the USB host controller. In addition, other USB hubs may be coupled to the USB hub to provide additional USB device connections to the USB host controller.

32. The electronics marketplace has seen a proliferation of appliances and personal electronics devices that use solid-state memory. The most widely used solid-state memory devices include flash-memory chips configured on a small removable memory card, and are commonly referred to as flash-memory cards. Typically, a flash-memory card can easily be removed from the utilizing device. Most recently, the preferred interface between flash memory card readers and PCs has been the Universal Serial Bus, where the flash-memory card reader is connected to a USB port on the PC via a USB cable. Given different memory card formats multi-format card readers are typically designed with a USB interface. While USB devices, such as multi-format card readers and USB hubs designed with a USB interface, are typically connected to host devices via a USB cable, they may also be designed into computers as embedded USB devices.

33. In various embodiments, a USB device (e.g., a USB hub or card reader) coupled to a USB host controller may communicate with the USB host controller through an upstream port. In some embodiments, a USB hub may be coupled to a USB port to provide additional USB ports. Data may be transmitted from the USB device to the USB host controller and then used by a central processing unit (CPU). In some embodiments, if the USB device is turned off or is not in an active state (e.g., no cards are present in a USB card reader or no devices are attached to a USB hub), an algorithm (e.g., from the device's firmware) may be implemented to electrically disconnect the USB device from the USB host controller. In some embodiments, when the USB device is electrically disconnected from the USB host controller and no system activity from a bus mastering peripheral is occurring on the PCI bus, the CPU may enter a low power state (other system conditions may also need to be met).

34. The 733 and 766 Patents relate to the memory devices described above. The technologies protected by the Asserted Patents were developed to overcome the drawbacks associated with conventional memory technology and to improve their capabilities. The Asserted Patents cover different aspects of memory devices, for example, improving the usage of power in devices in different ways. Section IV, below, identifies the Asserted Patents in detail, along with a further description of the technology covered by each.

B. U.S. Patent No. 8,193,792

35. Modern electronics devices commonly include chips that perform both information processing and information retention in memory elements. In modern devices, there is also a paramount interest in minimizing the amount of electrical power consumed by such chips, particularly in low-power “sleep” modes during which information processing functionality is suspended. The ’792 Patent relates to specific improvements in circuit designs to enable particularly low power consumption in sleep mode, while retaining information in memory and while simultaneously preventing undefined states in the information processing section of the device.

36. Voltage regulators are critical components that provide a stable and predictable power supply for both information processing and memory circuits. These regulators, however, consume power on their own whenever they are activated, even if they are supplying little or no power to other circuit elements. The ’792 Patent therefore teaches having a plurality of voltage regulators to allow greater flexibility in power saving. In particular, a first voltage regulator provides a supply voltage during an operating mode of the circuit, and a second voltage regulator provides a standby voltage during a sleep mode of the circuit.

37. An additional problem arises in low-power sleep modes because the information processing and memory circuits remain connected while the information processing circuit is not

provided with operating voltage. Due to the isolation of the information processing circuitry from its power supply, undefined states may arise. To prevent such undefined states from affecting the memory circuitry, the invention of the '792 Patent also deactivates the inputs of the circuit section during the transition to sleep mode.

38. The '792 Patent relates to the information processing and memory devices described above. The technologies protected by the Asserted Patents were developed to overcome the drawbacks associated with conventional circuits and to improve their capabilities.

IV. THE ASSERTED PATENTS

39. The Asserted Patents generally relate to memory devices and power-saving features therefor. Memory devices are used in many high-tech products, including personal computers, laptops, servers, mobile phones, tablets, and other consumer and industrial products.

40. The identification, ownership, non-technical description, foreign counterparts, and licensees for each Asserted Patent are identified below.

A. U.S. Patent No. 7,159,766

1. Identification of the Patent and Ownership

41. The '766 Patent, titled "Peripheral Device Feature Allowing Processors to Enter a Low Power State," issued on January 9, 2007, naming Henry Wurzburg, Tetsuo Yamamoto, and Mark Colman Atchison as the inventors. Ex. 1 ('766 Patent) at 1. The '766 Patent is based on U.S. Patent Application No. 10/762,767 filed January 20, 2004. *Id.* at 1. The '766 Patent claims priority to U.S. Patent Application No. 10/762,767 filed January 20, 2004. *Id.* The expiration date of the '766 Patent is July 5, 2024. A certified copy of the '766 Patent is attached as Exhibit 1.

42. This Complaint is accompanied by a certified copy of the prosecution history for the '766 Patent, three additional copies of the prosecution history, and four copies of each patent

and applicable pages of each technical reference mentioned in the prosecution history for the '766 Patent. *See* Appx. A1 and A2.

43. Sonrai owns by assignment all rights, title, and interest in the '766 Patent. *See* Exhibits 4, 5, and 9.

2. Nontechnical Description of the Patent

44. The '766 Patent concerns improved designs and methods relating to peripheral devices to computer systems. Typically, adding an embedded USB device, such as a card reader or hub, to a computer adversely affects power consumption of the computer. In general, a USB device attached to the USB host controller of the computer may prevent the central processing unit of the computer from entering a low power state. This may especially be a problem for embedded devices. Unnecessary power may also be used to power a memory card that is not in use. The '766 Patent teaches and claims improved designs and methods relating to at least this problem.

3. Foreign Counterparts of the Patent

45. The following foreign patents and patent applications correspond to the '766 Patent: (a) Korean Patent Application No. KR20050087577A (issued as Korean Patent No. KR100735977B1 on June 28, 2007); (b) Taiwanese Patent Application No. TW94132283A (issued as Taiwanese Patent No. TWI279752B on April 21, 2007); (c) Chinese Patent Application No. CN200510106398A (issued as Chinese Patent No. CN100595819C on March 24, 2010); (d) Chinese Patent Application No. CN200810083217A (issued as Chinese Patent No. CN101266945B on February 22, 2012); (e) Japanese Patent Application No. JP2004273532A (issued as Japanese Patent No. JP4379278B2 on December 9, 2009); (f) Japanese Patent Application No. JP2004273532A (issued as Japanese Patent No. JP4379278B2 on December 9, 2009); and (g) Japanese Patent Application No. JP22008231811A (issued as Japanese Patent No. JP5040867B2 on October 3, 2012).

46. To the best of Sonrai's knowledge, information, and belief, there are no other foreign patents issued or foreign patent applications pending, filed, abandoned, withdrawn, or rejected corresponding to the '766 Patent.

4. Licensee(s)

47. All licensee(s) to the '766 Patent are identified in Confidential Exhibit 10C. There are no other known licenses relating to the '766 Patent.

B. U.S. Patent No. 7,325,733

1. Identification of the Patent and Ownership

48. The '733 Patent, titled "~~Display Apparatus and Drive Control Method Thereof~~Electrically Disconnecting A Peripheral Device," issued on ~~January 11, 2011~~February 5, 2008, naming ~~Tsuyoshi Ozaki and Jun Ogura~~Henry Wurzburg, Yetsuo Yamamoto, and Mark Colman Atchison as the inventors. Ex. 2 ('733 Patent) at 1. The '733 Patent is based on U.S. Patent Application No. 11/~~438,967~~530,977 filed ~~May 23~~September 12, 2006. *Id.* The '733 Patent claims priority to ~~Japanese Foreign Application Nos. 2005-150566~~2005209204A filed ~~May 24~~August 4, 2005 and ~~2005-153382~~ filed ~~May 26, 2005~~U.S. Patent Application No. 10/762,767, filed on Jan. 20, 2004. *Id.* The expiration date of the '733 Patent is ~~April 13, 2029~~January 20, 2024. A certified copy of the '733 Patent is attached as Exhibit 2.

49. This Complaint is accompanied by a certified copy of the prosecution history for the '733 Patent, three additional copies of the prosecution history, and four copies of each patent and applicable pages of each technical reference mentioned in the prosecution history for the '733 Patent. *See* Appx. B1 and B2.

50. Sonrai owns by assignment all rights, title, and interest in the '733 Patent. *See* Exhibits 6 and 9.

4. Licensee(s)

54. All licensee(s) to the '733 Patent are identified in Confidential Exhibit 10C. There are no other known licenses relating to the '733 Patent.

C. U.S. Patent No. 8,193,792

1. Identification of the Patent and Ownership

55. The '792 Patent, titled "Circuit and method for operating a circuit," issued on June 5, 2012, naming Wolfram Kluge, Jeannette Zarbock, and Tilo Ferchland as inventors. Ex. 3 ('792 Patent) at 1. The '792 Patent is based on U.S. Patent Application No. 12/481,330 filed June 9, 2009. *Id.* The '792 Patent claims priority to U.S. provisional patent application No. 61/060,626 filed June 11, 2008, and German patent application 10 2009 027 392 filed June 9, 2008. *Id.* The expiration date of the '792 Patent is August 13, 2030. A certified copy of the '792 Patent is attached as Exhibit 3.

56. This Complaint is accompanied by a certified copy of the prosecution history for the '792 Patent, three additional copies of the prosecution history, and four copies of each patent and applicable pages of each technical reference mentioned in the prosecution history for the '792 Patent. *See* Appx. C1 and C2.

57. Sonrai owns by assignment all rights, title, and interest in the '792 Patent. *See* Exhibits 7-9.

2. Nontechnical Description of the Patent

58. The '792 Patent relates to power-saving digital circuits; in particular, circuits including both information processing and memory elements. The '792 Patent describes a novel method and apparatus that remedies some of the drawbacks facing circuits that perform both information processing and memory storage; namely, that the operating mode for the information processing portion of the circuit consumes significantly more current and therefore power than is

required to maintain information in the memory storage during a sleep mode. The '792 Patent improves on conventional devices by providing two voltage regulators and circuitry to improve upon the circuit's ability to transition between operating mode and sleep mode.

3. Foreign Counterparts of the Patent

59. The following foreign patents and patent applications correspond to the '792 Patent: (a) German patent application DE102008027392A1 (which issued on March 21, 2019, as German Patent No. DE102008027392B4); (b) Chinese patent application number CN2009101391228A (which issued on September 4, 2013 as Chinese Patent No. CN101604549B); (c) European patent application EP2133881A1 (which has been withdrawn); (d) U.S. patent application US13/485,426 (which issued on April 9, 2013 as U.S. Patent No. 8,415,939).

60. To the best of Sonrai's knowledge, information, and belief, there are no other foreign patents issued or foreign patent applications pending, filed, abandoned, withdrawn, or rejected corresponding to the '792 Patent.

4. Licensee(s)

61. All licensee(s) to the '792 Patent are identified in Confidential Exhibit 10C. There are no other known licenses relating to the '792 Patent.

V. UNLAWFUL AND UNFAIR ACTS OF THE PROPOSED RESPONDENTS

62. Sonrai asserts that the Proposed Respondents directly infringe, literally or under the doctrine of equivalents, and/or actively induce the infringement infringe at least the following claims of the Asserted Patents, in violation of 35 U.S.C. §§ 271(a), (b), and/or (c) and Section 337(a)(1)(B)(i):

Respondent	'766 Patent	'733 Patent	'792 Patent
Amazon	X	X	X
Dell	X	X	X
Lenovo	X	X	X

Respondent	'766 Patent	'733 Patent	'792 Patent
LG	X	X	X
Motorola	X	X	
Samsung	X	X	X

A. Amazon

1. Infringement of the '766 Patent

63. On information and belief, Amazon imports and/or sells within the United States after importation certain Accused Products (the “Amazon Accused Products”), such as laptops and desktops with Windows Modern Standby and mobile phones and tablets supporting Android Doze, that directly infringe, literally and/or under the doctrine of equivalents, at least claims 1, 3-6, 8, 10, 13, 14, 16-21, 25-27, 45, 47-50, 54-56, 57, 58, and 60 of the '766 Patent. The Amazon Accused Products satisfy all claim limitations of at least claims 1, 3-6, 8, 10, and 13 of the '766 Patent at the time of importation into the United States.

64. Amazon also knowingly and intentionally induces infringement of at least claims 1, 3-6, 8, 10, and 13 of the '766 Patent in violation of 35 U.S.C. § 271(b). Through the filing and service of this Complaint, and also through the filing and service of the related District Court complaints referenced in Section VIII, including the related '766 litigation against Amazon, Amazon has had knowledge of the '766 Patent and the infringing nature of the Amazon Accused Products. Despite this knowledge of the '766 Patent, Amazon continues to actively encourage and instruct its customers and end users to use the Amazon Accused Products in ways that directly infringe the '766 Patent. Amazon does so knowing and intending that its customers and end users will commit these infringing acts. Amazon also continues to import and/or sell in the United States the Amazon Accused Products, despite its knowledge of the '766 Patent, thereby specifically intending for and inducing its customers to infringe the '766 Patent through the customers' normal and customary use of the Amazon Accused Products.

65. A claim chart comparing independent claims 1, 14, 45, and 57 of the '766 Patent to representative Amazon Accused Products, the Samsung Galaxy S20 5G and Samsung Galaxy Book Flex, and including photographs and drawings where applicable, is attached as Exhibits 33 and 34.

2. Infringement of the '733 Patent

66. On information and belief, Amazon imports and/or sells within the United States after importation certain Accused Products (the "Amazon Accused Products"), such as laptops and desktops with Windows Modern Standby and mobile phones and tablets supporting Android Doze, that directly infringe, literally and/or under the doctrine of equivalents, at least claims 1, 2-3, 6-7, 9, 11-12, 13, 14-15, 17-18, 20-21, 22, 23, and 25 of the '733 Patent. The Amazon Accused Products satisfy all claim limitations of at least claims 1, 2-3, 6-7, 9, 11-12, 13, 14-15, 17-18, 20-21, 22, 23, and 25 of the '733 Patent at the time of importation into the United States.

67. Amazon also knowingly and intentionally induces infringement of at least claims 1, 2-3, 6-7, 9, 11-12, 13, 14-15, 17-18, 20-21, 22, 23, and 25 of the '733 Patent in violation of 35 U.S.C. § 271(b). Through the filing and service of this Complaint, and also through the filing and service of the related District Court complaints referenced in Section VIII, including the related '766 litigation against Amazon, Amazon has had knowledge of the '733 Patent and the infringing nature of the Amazon Accused Products. Despite this knowledge of the '733 Patent, Amazon continues to actively encourage and instruct its customers and end users to use the Amazon Accused Products in ways that directly infringe the '733 Patent. Amazon does so knowing and intending that its customers and end users will commit these infringing acts. Amazon also continues to import and/or sell in the United States the Amazon Accused Products, despite its knowledge of the '733 Patent, thereby specifically intending for and inducing its customers to

infringe the '733 Patent through the customers' normal and customary use of the Amazon Accused Products.

68. Claim charts comparing independent claims 1, 13, and 22 of the '733 Patent to representative Amazon Accused Products, the Samsung Galaxy S20 5G and Samsung Galaxy Book Flex, and including photographs and drawings where applicable, is attached as Exhibits 40 and 41.

3. Infringement of the '792 Patent

69. On information and belief, Amazon imports and/or sells within the United States after importation certain Accused Products (the "Amazon Accused Products"), such as laptops with Intel processors including Fully Integrated Voltage Regulators, that directly infringe, literally and/or under the doctrine of equivalents, at least claims 1-18 of the '792 Patent. The Amazon Accused Products satisfy all claim limitations of at least claims 1-18 of the '792 Patent at the time of importation into the United States.

70. Amazon also knowingly and intentionally induces infringement of at least claims 1-9 of the '792 Patent in violation of 35 U.S.C. § 271(b). Through the filing and service of this Complaint, and also through the filing and service of the related District Court complaints referenced in Section VIII, including the related '792 litigation against Amazon, Amazon has had knowledge of the '792 Patent and the infringing nature of the Amazon Accused Products. Despite this knowledge of the '792 Patent, Amazon continues to actively encourage and instruct their customers and end users to use the Amazon Accused Products in ways that directly infringe the '792 Patent. Amazon does so knowing and intending that its customers and end users will commit these infringing acts. Amazon also continues to import and/or sell in the United States the Amazon Accused Products, despite its knowledge of the '792 Patent, thereby specifically intending for and

inducing its customers to infringe the '792 Patent through the customers' normal and customary use of the Amazon Accused Products.

71. A claim chart comparing independent claims 1 and 10 of the '792 Patent to a representative Amazon Accused Product, the Samsung Galaxy Book Flex, and including photographs and drawings where applicable, is attached as Exhibit 45.

B. Dell

1. Infringement of the '766 Patent

72. On information and belief, Dell imports, sells for importation, and/or sells within the United States after importation certain Accused Products (the "Dell Accused Products"), such as laptops, desktops, and servers with Windows Modern Standby, that directly infringe, literally and/or under the doctrine of equivalents, at least claims 1, 3-6, 8, 10, 13, 14, 16-21, 25-27, 45, 47-50, 54-56, 57, 58, and 60 of the '766 Patent. The Dell Accused Products satisfy all claim limitations of at least claims 1, 3-6, 8, 10, and 13 of the '766 Patent at the time of importation into the United States.

73. Dell also knowingly and intentionally induces infringement of at least claims 1, 3-6, 8, 10, and 13 of the '766 Patent in violation of 35 U.S.C. § 271(b). Through the filing and service of this Complaint, and also through the filing and service of the related District Court complaints referenced in Section VIII, including the related '766 litigation against Dell, Dell has had knowledge of the '766 Patent and the infringing nature of the Dell Accused Products. Despite this knowledge of the '766 Patent, Dell continues to actively encourage and instruct its customers and end users (for example, through its user manuals and online instruction materials on its website) to use the Dell Accused Products in ways that directly infringe the '766 Patent. Dell does so knowing and intending that its customers and end users will commit these infringing acts. Dell also continues to import, sell for importation, and/or sell in the United States the Dell Accused

Products, despite its knowledge of the '766 Patent, thereby specifically intending for and inducing its customers to infringe the '766 Patent through the customers' normal and customary use of the Dell Accused Products.

74. A claim chart comparing independent claims 1, 14, 45, and 57 of the '766 Patent to a representative Dell Accused Product, the Dell XPS 13, and including photographs and drawings where applicable, is attached as Exhibit 28.

2. Infringement of the '733 Patent

75. On information and belief, Dell imports, sells for importation, and/or sells within the United States after importation certain Accused Products (the "Dell Accused Products"), such as laptops, desktops, and servers with Windows Modern Standby, that directly infringe, literally and/or under the doctrine of equivalents, at least claims 1, 2-3, 6-7, 9, 11-12, 13, 14-15, 17-18, 20-21, 22, 23, and 25 of the '733 Patent. The Dell Accused Products satisfy all claim limitations of at least claims 1, 2-3, 6-7, 9, 11-12, 13, 14-15, 17-18, 20-21, 22, 23, and 25 of the '733 Patent at the time of importation into the United States.

76. Dell also knowingly and intentionally induces infringement of at least claims 1, 2-3, 6-7, 9, 11-12, 13, 14-15, 17-18, 20-21, 22, 23, and 25 of the '733 Patent in violation of 35 U.S.C. § 271(b). Through the filing and service of this Complaint, and also through the filing and service of the related District Court complaints referenced in Section VIII, including the related '766 litigation against Dell, Dell has had knowledge of the '733 Patent and the infringing nature of the Dell Accused Products. Despite this knowledge of the '733 Patent, Dell continues to actively encourage and instruct its customers and end users (for example, through its user manuals and online instruction materials on its website) to use the Dell Accused Products in ways that directly infringe the '733 Patent. Dell does so knowing and intending that its customers and end users will commit these infringing acts. Dell also continues to import, sell for importation, and/or sell in the

United States the Dell Accused Products, despite its knowledge of the '733 Patent, thereby specifically intending for and inducing its customers to infringe the '733 Patent through the customers' normal and customary use of the Dell Accused Products.

77. A claim chart comparing independent claims 1, 16, and 22 of the '733 Patent to a representative Dell Accused Product, the Dell XPS 13, and including photographs and drawings where applicable, is attached as Exhibit 35.

3. Infringement of the '792 Patent

78. On information and belief, Dell imports, sells for importation, and/or sells within the United States after importation certain Accused Products (the "Dell Accused Products"), such as laptops and servers with Intel processors including Fully Integrated Voltage Regulators, that directly infringe, literally and/or under the doctrine of equivalents, at least claims 1-18 of the '792 Patent. The Dell Accused Products satisfy all claim limitations of at least claims 1-18 of the '792 Patent at the time of importation into the United States.

79. Dell also knowingly and intentionally induces infringement of at least claims 1-9 of the '792 Patent in violation of 35 U.S.C. § 271(b). Through the filing and service of this Complaint, and also through the filing and service of the related District Court complaints referenced in Section VIII, including the related '792 litigation against Dell, Dell has had knowledge of the '792 Patent and the infringing nature of the Dell Accused Products. Despite this knowledge of the '792 Patent, Dell continues to actively encourage and instruct their customers and end users (for example, through its user manuals and online instruction materials on its website) to use the Dell Accused Products in ways that directly infringe the '792 Patent. Dell does so knowing and intending that its customers and end users will commit these infringing acts. Dell also continues to import, sell for importation, and/or sell in the United States the Dell Accused Products, despite its knowledge of the '792 Patent, thereby specifically intending for and inducing

its customers to infringe the '792 Patent through the customers' normal and customary use of the Dell Accused Products.

80. A claim chart comparing independent claims 1 and 10 of the '792 Patent to a representative Dell Accused Product, the Dell XPS 13, and including photographs and drawings where applicable, is attached as Exhibit 42.

C. Lenovo

1. Infringement of the '766 Patent

81. On information and belief, Lenovo imports, sells for importation, and/or sells within the United States after importation certain Accused Products (the "Lenovo Accused Products"), such as laptops, desktops, and servers with Windows Modern Standby, that directly infringe, literally and/or under the doctrine of equivalents, at least claims 1, 3-6, 8, 10, 13, 14, 16-21, 25-27, 45, 47-50, 54-56, 57, 58, and 60 of the '766 Patent. The Lenovo Accused Products satisfy all claim limitations of at least claims 11, 3-6, 8, 10, 13, 14, 16-21, 25-27, 45, 47-50, 54-56, 57, 58, and 60 of the '766 Patent at the time of importation into the United States.

82. Lenovo also knowingly and intentionally induces infringement of at least claims 1, 3-6, 8, 10, and 13 of the '766 Patent in violation of 35 U.S.C. § 271(b). Through the filing and service of this Complaint, and also through the filing and service of the related District Court complaints referenced in Section VIII, including the related '766 litigation against Lenovo, Lenovo has had knowledge of the '766 Patent and the infringing nature of the Lenovo Accused Products. Despite this knowledge of the '766 Patent, Lenovo continues to actively encourage and instruct its customers and end users (for example, through its user manuals and online instruction materials on its website) to use the Lenovo Accused Products in ways that directly infringe the '766 Patent. Lenovo does so knowing and intending that its customers and end users will commit these infringing acts. Lenovo also continues to import, sell for importation, and/or sell in the United

States the Lenovo Accused Products, despite its knowledge of the '766 Patent, thereby specifically intending for and inducing its customers to infringe the '766 Patent through the customers' normal and customary use of the Lenovo Accused Products.

83. A claim chart comparing independent claims 1, 14, 445, and 57 of the '766 Patent to a representative Lenovo Accused Product, the ThinkPad T14, and including photographs and drawings where applicable, is attached as Exhibit 29.

2. Infringement of the '733 Patent

84. On information and belief, Lenovo imports, sells for importation, and/or sells within the United States after importation certain Accused Products (the "Lenovo Accused Products"), such as laptops, desktops, and servers with Windows Modern Standby, that directly infringe, literally and/or under the doctrine of equivalents, at least claims 1, 2-3, 6-7, 9, 11-12, 13, 14-15, 17-18, 20-21, 22, 23, and 25 of the '733 Patent. The Lenovo Accused Products satisfy all claim limitations of at least claims 1, 2-3, 6-7, 9, 11-12, 13, 14-15, 17-18, 20-21, 22, 23, and 25 of the '733 Patent at the time of importation into the United States.

85. Lenovo also knowingly and intentionally induces infringement of at least claims 1, 2-3, 6-7, 9, 11-12, 13, 14-15, 17-18, 20-21, 22, 23, and 25 of the '733 Patent in violation of 35 U.S.C. § 271(b). Through the filing and service of this Complaint, and also through the filing and service of the related District Court complaints referenced in Section VIII, including the related '766 litigation against Lenovo, Lenovo has had knowledge of the '733 Patent and the infringing nature of the Lenovo Accused Products. Despite this knowledge of the '733 Patent, Lenovo continues to actively encourage and instruct its customers and end users (for example, through its user manuals and online instruction materials on its website) to use the Lenovo Accused Products in ways that directly infringe the '733 Patent. Lenovo does so knowing and intending that its customers and end users will commit these infringing acts. Lenovo also continues to import, sell

for importation, and/or sell in the United States the Lenovo Accused Products, despite its knowledge of the '733 Patent, thereby specifically intending for and inducing its customers to infringe the '733 Patent through the customers' normal and customary use of the Lenovo Accused Products.

86. A claim chart comparing independent claims 1, 13, and 22 of the '733 Patent to a representative Lenovo Accused Product, the ThinkPad T14, and including photographs and drawings where applicable, is attached as Exhibit 36.

3. Infringement of the '792 Patent

87. On information and belief, Lenovo imports, sells for importation, and/or sells within the United States after importation certain Accused Products (the "Lenovo Accused Products"), such as laptops and servers with Intel processors including Fully Integrated Voltage Regulators, that directly infringe, literally and/or under the doctrine of equivalents, at least claims 1-18 of the '792 Patent. The Lenovo Accused Products satisfy all claim limitations of at least claims 1-18 of the '792 Patent at the time of importation into the United States.

88. Lenovo also knowingly and intentionally induces infringement of at least claims 1-9 of the '792 Patent in violation of 35 U.S.C. § 271(b). Through the filing and service of this Complaint, and also through the filing and service of the related District Court complaints referenced in Section VIII, including the related '792 litigation against Lenovo, Lenovo has had knowledge of the '792 Patent and the infringing nature of the Lenovo Accused Products. Despite this knowledge of the '792 Patent, Lenovo continues to actively encourage and instruct their customers and end users (for example, through its user manuals and online instruction materials on its website) to use the Lenovo Accused Products in ways that directly infringe the '792 Patent. Lenovo does so knowing and intending that its customers and end users will commit these infringing acts. Lenovo also continues to import, sell for importation, and/or sell in the United

States the Lenovo Accused Products, despite its knowledge of the '792 Patent, thereby specifically intending for and inducing its customers to infringe the '792 Patent through the customers' normal and customary use of the Lenovo Accused Products.

89. A claim chart comparing independent claims 1 and 10 of the '792 Patent to a representative Lenovo Accused Product, the ThinkPad T14, and including photographs and drawings where applicable, is attached as Exhibit 43.

D. LG

1. Infringement of the '766 Patent

90. On information and belief, LG imports, sells for importation, and/or sells within the United States after importation certain Accused Products (the "LG Accused Products"), such as laptops and desktops with Windows Modern Standby and mobile phones and tablets supporting Android Doze, that directly infringe, literally and/or under the doctrine of equivalents, at least claims 1, 3-6, 8, 10, 13, 14, 16-21, 25-27, 45, 47-50, 54-56, 57, 58, and 60 of the '766 Patent. The LG Accused Products satisfy all claim limitations of at least claims 1, 3-6, 8, 10, 13, 14, 16-21, 25-27, 45, 47-50, 54-56, 57, 58, and 60 of the '766 Patent at the time of importation into the United States.

91. LG also knowingly and intentionally induces infringement of at least claims 1, 3-6, 8, 10, and 13 of the '766 Patent in violation of 35 U.S.C. § 271(b). Through the filing and service of this Complaint, and also through the filing and service of the related District Court complaints referenced in Section VIII, including the related '766 litigation against LG, LG has had knowledge of the '766 Patent and the infringing nature of the LG Accused Products. Despite this knowledge of the '766 Patent, LG continues to actively encourage and instruct its customers and end users (for example, through its user manuals and online instruction materials on its website) to use the LG Accused Products in ways that directly infringe the '766 Patent. LG does so knowing and

intending that its customers and end users will commit these infringing acts. LG also continues to import, sell for importation, and/or sell in the United States the LG Accused Products, despite its knowledge of the '766 Patent, thereby specifically intending for and inducing its customers to infringe the '766 Patent through the customers' normal and customary use of the LG Accused Products.

92. Claim charts comparing independent claims 1, 14, 45, and 57 of the '766 Patent to representative LG Accused Products, the LG V40 and LG gram 15, and including photographs and drawings where applicable, are attached as Exhibits 30 and 31.

2. Infringement of the '733 Patent

93. On information and belief, LG imports, sells for importation, and/or sells within the United States after importation certain Accused Products (the "LG Accused Products"), such as laptops and desktops with Windows Modern Standby and mobile phones and tablets supporting Android Doze, that directly infringe, literally and/or under the doctrine of equivalents, at least claims 1, 2-3, 6-7, 9, 11-12, 13, 14-15, 17-18, 20-21, 22, 23, and 25 of the '733 Patent. The LG Accused Products satisfy all claim limitations of at least claims 1, 2-3, 6-7, 9, 11-12, 13, 14-15, 17-18, 20-21, 22, 23, and 25 of the '733 Patent at the time of importation into the United States.

94. LG also knowingly and intentionally induces infringement of at least claims 1, 2-3, 6-7, 9, 11-12, 13, 14-15, 17-18, 20-21, 22, 23, and 25 of the '733 Patent in violation of 35 U.S.C. § 271(b). Through the filing and service of this Complaint, and also through the filing and service of the related District Court complaints referenced in Section VIII, including the related '766 litigation against LG, LG has had knowledge of the '733 Patent and the infringing nature of the LG Accused Products. Despite this knowledge of the '733 Patent, LG continues to actively encourage and instruct its customers and end users (for example, through its user manuals and online instruction materials on its website) to use the LG Accused Products in ways that directly

infringe the '733 Patent. LG does so knowing and intending that its customers and end users will commit these infringing acts. LG also continues to import, sell for importation, and/or sell in the United States the LG Accused Products, despite its knowledge of the '733 Patent, thereby specifically intending for and inducing its customers to infringe the '733 Patent through the customers' normal and customary use of the LG Accused Products.

95. Claim charts comparing independent claims 1, 13, and 22 of the '733 Patent to representative LG Accused Products, the LG V40 and LG gram 15, and including photographs and drawings where applicable, are attached as Exhibit 37 and 38.

3. Infringement of the '792 Patent

96. On information and belief, LG imports, sells for importation, and/or sells within the United States after importation certain Accused Products (the "LG Accused Products"), such as laptops with Intel processors including Fully Integrated Voltage Regulators, that directly infringe, literally and/or under the doctrine of equivalents, at least claims 1-18 of the '792 Patent. The LG Accused Products satisfy all claim limitations of at least claims 1-18 of the '792 Patent at the time of importation into the United States.

97. LG also knowingly and intentionally induces infringement of at least claims 1-9 of the '792 Patent in violation of 35 U.S.C. § 271(b). Through the filing and service of this Complaint, and also through the filing and service of the related District Court complaints referenced in Section VIII, including the related '792 litigation against LG, LG has had knowledge of the '792 Patent and the infringing nature of the LG Accused Products. Despite this knowledge of the '792 Patent, LG continues to actively encourage and instruct their customers and end users (for example, through its user manuals and online instruction materials on its website) to use the LG Accused Products in ways that directly infringe the '792 Patent. LG does so knowing and intending that its customers and end users will commit these infringing acts. LG also continues to import,

sell for importation, and/or sell in the United States the LG Accused Products, despite its knowledge of the '792 Patent, thereby specifically intending for and inducing its customers to infringe the '792 Patent through the customers' normal and customary use of the LG Accused Products.

98. A claim chart comparing independent claims 1 and 10 of the '792 Patent to a representative LG Accused Product, the LG gram 15, and including photographs and drawings where applicable, are attached as Exhibit 44

E. Motorola

1. Infringement of the '766 Patent

99. On information and belief, Motorola imports, sells for importation, and/or sells within the United States after importation certain Accused Products (the "Motorola Accused Products"), such as mobile phones and tablets supporting Android Doze, that directly infringe, literally and/or under the doctrine of equivalents, at least claims 1, 3-6, 8, 10, 13, 14, 16-21, 25-27, 45, 47-50, 54-56, 57, 58, and 60 of the '766 Patent. The Motorola Accused Products satisfy all claim limitations of at least claims 1, 3-6, 8, 10, 13, 14, 16-21, 25-27, 45, 47-50, 54-56, 57, 58, and 60 of the '766 Patent at the time of importation into the United States.

100. Motorola also knowingly and intentionally induces infringement of at least claims 1, 3-6, 8, 10, and 13 of the '766 Patent in violation of 35 U.S.C. § 271(b). Through the filing and service of this Complaint, and also through the filing and service of the related District Court complaints referenced in Section VIII, including the related '766 litigation against Motorola, Motorola has had knowledge of the '766 Patent and the infringing nature of the Motorola Accused Products. Despite this knowledge of the '766 Patent, Motorola continues to actively encourage and instruct its customers and end users (for example, through its user manuals and online instruction materials on its website) to use the Motorola Accused Products in ways that directly infringe the

'766 Patent. Motorola does so knowing and intending that its customers and end users will commit these infringing acts. Motorola also continues to import, sell for importation, and/or sell in the United States the Motorola Accused Products, despite its knowledge of the '766 Patent, thereby specifically intending for and inducing its customers to infringe the '766 Patent through the customers' normal and customary use of the Motorola Accused Products.

101. A claim chart comparing independent claims 1, 14, 45, and 57 of the '766 Patent to a representative Motorola Accused Product, the Motorola Razr, and including photographs and drawings where applicable, is attached as Exhibit 32.

2. Infringement of the '733 Patent

102. On information and belief, Motorola imports, sells for importation, and/or sells within the United States after importation certain Accused Products (the "Motorola Accused Products"), such as mobile phones and tablets supporting Android Doze, that directly infringe, literally and/or under the doctrine of equivalents, at least claims 1, 2-3, 6-7, 9, 11-12, 13, 14-15, 17-18, 20-21, 22, 23, and 25 of the '733 Patent. The Motorola Accused Products satisfy all claim limitations of at least claims 1, 2-3, 6-7, 9, 11-12, 13, 14-15, 17-18, 20-21, 22, 23, and 25 of the '733 Patent at the time of importation into the United States.

103. Motorola also knowingly and intentionally induces infringement of at least claims 1, 2-3, 6-7, 9, 11-12, 13, 14-15, 17-18, 20-21, 22, 23, and 25 of the '733 Patent in violation of 35 U.S.C. § 271(b). Through the filing and service of this Complaint, and also through the filing and service of the related District Court complaints referenced in Section VIII, including the related '766 litigation against Motorola, Motorola has had knowledge of the '733 Patent and the infringing nature of the Motorola Accused Products. Despite this knowledge of the '733 Patent, Motorola continues to actively encourage and instruct its customers and end users (for example, through its user manuals and online instruction materials on its website) to use the Motorola Accused Products

in ways that directly infringe the '733 Patent. Motorola does so knowing and intending that its customers and end users will commit these infringing acts. Motorola also continues to import, sell for importation, and/or sell in the United States the Motorola Accused Products, despite its knowledge of the '733 Patent, thereby specifically intending for and inducing its customers to infringe the '733 Patent through the customers' normal and customary use of the Motorola Accused Products.

104. A claim chart comparing independent claims 1, 13, and 22 of the '733 Patent to a representative Motorola Accused Product, the Motorola Razr, and including photographs and drawings where applicable, is attached as Exhibit 39.

F. Samsung

1. Infringement of the '766 Patent

105. On information and belief, Samsung imports, sells for importation, and/or sells within the United States after importation certain Accused Products (the "Samsung Accused Products"), such as laptops and desktops with Windows Modern Standby and mobile phones and tablets supporting Android Doze, that directly infringe, literally and/or under the doctrine of equivalents, at least claims 1, 3-6, 8, 10, 13, 14, 16-21, 25-27, 45, 47-50, 54-56, 57, 58, and 60 of the '766 Patent. The Samsung Accused Products satisfy all claim limitations of at least claims 1, 3-6, 8, 10, 13, 14, 16-21, 25-27, 45, 47-50, 54-56, 57, 58, and 60 of the '766 Patent at the time of importation into the United States.

106. Samsung also knowingly and intentionally induces infringement of at least claims 1, 3-6, 8, 10, and 13 of the '766 Patent in violation of 35 U.S.C. § 271(b). Through the filing and service of this Complaint, and also through the filing and service of the related District Court complaints referenced in Section VIII, including the related '766 litigation against Samsung, Samsung has had knowledge of the '766 Patent and the infringing nature of the Samsung Accused

Products. Despite this knowledge of the '766 Patent, Samsung continues to actively encourage and instruct its customers and end users (for example, through its user manuals and online instruction materials on its website) to use the Samsung Accused Products in ways that directly infringe the '766 Patent. Samsung does so knowing and intending that its customers and end users will commit these infringing acts. Samsung also continues to import, sell for importation, and/or sell in the United States the Samsung Accused Products, despite its knowledge of the '766 Patent, thereby specifically intending for and inducing its customers to infringe the '766 Patent through the customers' normal and customary use of the Samsung Accused Products.

107. Claim charts comparing independent claims 1, 14, 45, and 57 of the '766 Patent to representative Samsung Accused Products, the Samsung Galaxy S20 5G and Samsung Galaxy Book Flex, and including photographs and drawings where applicable, is attached as Exhibits 33 and 34.

2. Infringement of the '733 Patent

108. On information and belief, Samsung imports, sells for importation, and/or sells within the United States after importation certain Accused Products (the "Samsung Accused Products"), such as laptops and desktops with Windows Modern Standby and mobile phones and tablets supporting Android Doze, that directly infringe, literally and/or under the doctrine of equivalents, at least claims 1, 2-3, 6-7, 9, 11-12, 13, 14-15, 17-18, 20-21, 22, 23, and 25 of the '733 Patent. The Samsung Accused Products satisfy all claim limitations of at least claims 1, 2-3, 6-7, 9, 11-12, 13, 14-15, 17-18, 20-21, 22, 23, and 25 of the '733 Patent at the time of importation into the United States.

109. Samsung also knowingly and intentionally induces infringement of at least claims 1, 2-3, 6-7, 9, 11-12, 13, 14-15, 17-18, 20-21, 22, 23, and 25 of the '733 Patent in violation of 35 U.S.C. § 271(b). Through the filing and service of this Complaint, and also through the filing and

service of the related District Court complaints referenced in Section VIII, including the related '766 litigation against Samsung, Samsung has had knowledge of the '733 Patent and the infringing nature of the Samsung Accused Products. Despite this knowledge of the '733 Patent, Samsung continues to actively encourage and instruct its customers and end users (for example, through its user manuals and online instruction materials on its website) to use the Samsung Accused Products in ways that directly infringe the '733 Patent. Samsung does so knowing and intending that its customers and end users will commit these infringing acts. Samsung also continues to import, sell for importation, and/or sell in the United States the Samsung Accused Products, despite its knowledge of the '733 Patent, thereby specifically intending for and inducing its customers to infringe the '733 Patent through the customers' normal and customary use of the Samsung Accused Products.

110. Claim charts comparing independent claims 1, 13, and 22 of the '733 Patent to representative Samsung Accused Products, the Samsung Galaxy S20 5G and Samsung Galaxy Book Flex, and including photographs and drawings where applicable, is attached as Exhibits 40 and 41.

3. Infringement of the '792 Patent

111. On information and belief, Samsung imports, sells for importation, and/or sells within the United States after importation certain Accused Products (the "Samsung Accused Products"), such as laptops with Intel processors including Fully Integrated Voltage Regulators, that directly infringe, literally and/or under the doctrine of equivalents, at least claims 1-18 of the '792 Patent. The Samsung Accused Products satisfy all claim limitations of at least claims 1-18 of the '792 Patent at the time of importation into the United States.

112. Samsung also knowingly and intentionally induces infringement of at least claims 1-9 of the '792 Patent in violation of 35 U.S.C. § 271(b). Through the filing and service of this

Complaint, and also through the filing and service of the related District Court complaints referenced in Section VIII, including the related '792 litigation against Samsung, Samsung has had knowledge of the '792 Patent and the infringing nature of the Samsung Accused Products. Despite this knowledge of the '792 Patent, Samsung continues to actively encourage and instruct their customers and end users (for example, through its user manuals and online instruction materials on its website) to use the Samsung Accused Products in ways that directly infringe the '792 Patent. Samsung does so knowing and intending that its customers and end users will commit these infringing acts. Samsung also continues to import, sell for importation, and/or sell in the United States the Samsung Accused Products, despite its knowledge of the '792 Patent, thereby specifically intending for and inducing its customers to infringe the '792 Patent through the customers' normal and customary use of the Samsung Accused Products.

113. A claim chart comparing independent claims 1 and 10 of the '792 Patent to a representative Samsung Accused Product, the Samsung Galaxy Book Flex, and including photographs and drawings where applicable, is attached as Exhibit 45.

VI. SPECIFIC INSTANCES OF IMPORTATION

A. Amazon

114. On information and belief, the Amazon Accused Products are manufactured outside of the United States and imported into the United States, and/or sold within the United States after importation. For example, Exhibit 23 is a receipt from Amazon.com showing the purchase of a Samsung Galaxy S20 5G for delivery to an address in the United States. Exhibit 24 contains a photograph of the product as received, delivered to an address in the United States, indicating that the Samsung Galaxy S20 5G is "Manufactured in Vietnam."

115. For another example, Exhibit 25 is a receipt from Amazon.com showing the purchase of a Samsung Galaxy Book Flex for delivery to an address in the United States. Exhibit

26 contains a photograph of the product packaging as received, delivered to an address in the United States, indicating that the Samsung Galaxy Book Flex is “Manufactured by Samsung Electronics in Vietnam.”

116. For additional examples of Amazon’s importation of Amazon Accused Products, Amazon imports and/or sells after importation the Acer Spin 3 SP314-54N-314V 2 in 1 Notebook and ASUS VivoBook S14 S435 Thin and Light Laptop. Exhibit 49 shows the Amazon.com product listing for the Acer Spin 3 SP314-54N-314V 2 in 1 Notebook, identifying that it is “Sold by Amazon.com” and showing “Country of Origin: China.” Exhibit 50 shows the Amazon.com product listing for the ASUS VivoBook S14 S435 Thin and Light Laptop, identifying that it is “Sold by Amazon.com” and that the “Country of Origin” is “China.”

B. Dell

117. On information and belief, the Dell Accused Products are manufactured outside of the United States and sold for importation into the United States, imported into the United States, and/or sold within the United States after importation. For example, Exhibit 13 is a receipt from Dell.com showing the purchase of a Dell XPS 13 for delivery to an address in the United States. Exhibit 14 contains a photograph of the product packaging for that item as received, delivered to an address in the United States, indicating that the Dell XPS 13 is “Made in China.”

C. Lenovo

118. On information and belief, the Lenovo Accused Products are manufactured outside of the United States and sold for importation into the United States, imported into the United States, and/or sold within the United States after importation. For example, Exhibit 15 is a receipt from Lenovo.com showing the purchase of a Lenovo Thinkpad T14 for delivery to an address in the United States. Exhibit 16 contains a photograph of the product packaging for that item as received,

delivered to an address in the United States, indicating that the Lenovo Thinkpad T14 is “Made in China.”

D. LG

119. On information and belief, the LG Accused Products are manufactured outside of the United States and sold for importation into the United States, imported into the United States, and/or sold within the United States after importation. For example, Exhibit 17 is a receipt from Amazon.com showing the purchase of an LG V40 for delivery to an address in the United States. Exhibit 18 contains a photograph of the product packaging as received, delivered to an address in the United States, indicating that the LG V40 is “Made in Korea.”

120. For another example, Exhibit 19 is a receipt from Amazon.com showing the purchase of an LG gram 15 for delivery to an address in the United States. Exhibit 20 contains a photograph of the product packaging as received, delivered to an address in the United States, indicating that the LG gram 15 is a “Product of China.”

E. Motorola

121. On information and belief, the Motorola Accused Products are manufactured outside of the United States and sold for importation into the United States, imported into the United States, and/or sold within the United States after importation. For example, Exhibit 21 is a receipt from Motorola.com showing the purchase of a Motorola Razr for delivery to an address in the United States. Exhibit 22 contains a photograph of the product packaging as received, delivered to an address in the United States, indicating that the Motorola Razr is “Made in India.”

F. Samsung

122. On information and belief, the Samsung Accused Products are manufactured outside of the United States and sold for importation into the United States, imported into the United States, and/or sold within the United States after importation. For example, Exhibit 23 is a

receipt from Amazon.com showing the purchase of a Samsung Galaxy S20 5G for delivery to an address in the United States. Exhibit 24 contains a photograph of the product as received, delivered to an address in the United States, indicating that the Samsung Galaxy S20 5G is “Manufactured in Vietnam.”

123. For another example, Exhibit 25 is a receipt from Amazon.com showing the purchase of a Samsung Galaxy Book Flex for delivery to an address in the United States. Exhibit 26 contains a photograph of the product packaging as received, delivered to an address in the United States, indicating that the Samsung Galaxy Book Flex is “Manufactured by Samsung Electronics in Vietnam.”

VII. CLASSIFICATION OF THE ACCUSED PRODUCTS UNDER THE HARMONIZED TARIFF SCHEDULE

124. The Accused Products are classified under at least the following subheadings of the Harmonized Tariff Schedule of the United States: 8471.30.01, 8471.41.01, 8471.49.00, 8471.60.90, 8471.50.01, and 8543.70.96 (laptops, desktops, and tablets); 8517.62.00 (servers); and 8517.12.00, 8517.62.00, and 8517.70.00 (smartphones). These classifications are exemplary in nature and not intended to restrict the scope of any exclusion order or other remedy ordered by the Commission.

VIII. RELATED LITIGATION

125. Complainant is filing complaints in the Western District of Texas against the Proposed Respondents concurrently with the filing of the instant Complaint, alleging infringement of one or more claims of the '766, '733, and '792 Patents, the same patents that have been asserted in this Complaint.

126. Other than the litigations specified above, to Complainant's knowledge, the Asserted Patents are not and have not been the subject of any current or prior litigation or agency proceeding.

IX. DOMESTIC INDUSTRY

127. A domestic industry exists under Section 337(a)(2) and 337(a)(3). In particular, a domestic industry exists as a result of Microchip’s significant investments in plant and equipment and significant employment of labor and capital have been made with respect to Domestic Industry Products (“DI Products”) that practice and are protected by the Asserted Patents. 19 U.S.C. § 1337(a)(3)(A)-(B). Pursuant to Commission Rule 210.12(a)(9)(iv), Complainant has attached as Confidential Exhibit 27C a copy of the Microchip license agreement.

A. Technical Prong

128. The asserted patents have led to significant and substantial investments in plant and equipment, labor and capital, and engineering and research and development with respect to products that practice one or more claims of the Asserted Patents (the “Domestic Industry Products”), including the following exemplary products: USB2532 and PIC24FJ128GB204.

129. Exhibits 46-48 are claim charts demonstrating that the Domestic Industry Products practice the Asserted Patents. The following table identifies the exemplary Domestic Industry Product with the corresponding Asserted Patent and exemplary Asserted Claims(s).

Asserted Patent	Exemplary Practiced Claims	Exemplary Domestic Industry Product
7,159,766	1, 14, 45, and 57	USB2532
7,325,733	1, 13, and 22	USB2532
8,193,792	1 and 10	PIC24FJ128GB204

130. Exemplary claim charts showing how the Domestic Industry Products practice exemplary claims of the ’766 Patent are attached as Exhibit 46. These claim charts provide a basis for the domestic industry relating to the ’766 Patent.

131. Exemplary claim charts showing how the Domestic Industry Products practice exemplary claims of the '733 Patent are attached as Exhibit 47. These claim charts provide a basis for the domestic industry relating to the '733 Patent.

132. Exemplary claim charts showing how the Domestic Industry Products practice exemplary claims of the '792 Patent are attached as Exhibit 48. These claim charts provide a basis for the domestic industry relating to the '792 Patent.

B. Economic Prong

133. Microchip has in the United States, with respect to the Domestic Industry Products, significant investments in plant and equipment, significant employment of labor and capital, and substantial investments in exploitation of the Asserted Patents. These investments and employment are all tied to the Asserted Patents. Confidential Exhibits 10C and 11C are declarations from knowledgeable Microchip witnesses detailing Microchip's significant and substantial activities, investments, and employment with respect to the Asserted Patents.

134. Microchip is the predecessor-in-interest of the Asserted Patents and, by virtue of a license back granted by Complainant, Microchip is fully licensed to practice each of the Asserted Patents. *See* Confidential Exhibit 27C. Within the United States, Microchip designs, develops, manufactures, sells, and supports products that use technology claimed by the Asserted Patents.

135. Microchip was founded in 1989 and is headquartered in Chandler, Arizona. Microchip is a leader in low-power hub and circuit technology. Microchip's Chandler headquarter campus is the nerve center and worldwide headquarters for all of its microcontroller and USB products and businesses.

136. Over the years, through its own patent filings and through company acquisitions, such as the acquisition of Atmel in 2016, Microchip obtained hundreds of United States patents related to microcontroller and memory design, and continues to research, manufacture, and sell

products at the forefront of this technology. Confidential Exhibit 11C at ¶¶ 3-5 and Confidential Exhibit 12C at ¶¶ 3-5.

137. Microchip and Atmel have invested and continue to invest significant sums in domestic labor, capital, plant, and equipment relating to the Domestic Industry Products. Details relating to Microchip's and Atmel's domestic expenditures on labor, capital, plant, and equipment are set forth in Confidential Exhibit 11C at ¶¶ 4-12 and Confidential Exhibit 12C at ¶¶ 4-12.

X. RELIEF REQUESTED

138. Proposed Respondents have infringed and will continue to infringe the Asserted Patents as specified in Sections V and VI above, unless the Commission prohibits the importation into and sale within the United States after importation of the Accused Products.

139. Accordingly, Sonrai respectfully requests that the United States International Trade Commission:

- a) Institute an immediate investigation pursuant to Section 337(b)(1) of the Tariff Act of 1930, as amended, 19 U.S.C. § 1337, into Proposed Respondents' violations of Section 337 arising from the sale for importation into the United States, importation, and/or sale within the United States after importation of certain laptops, desktops, servers, mobile phones, tablets, and components thereof that infringe the Asserted Patents;
- b) Schedule and conduct a hearing, pursuant to 19 U.S.C. § 1337 (c), for purposes of receiving evidence and hearing arguments concerning whether Proposed Respondents have violated Section 337 and, following the hearing, determine that Proposed Respondents have violated Section 337;
- c) Issue a permanent limited exclusion order, pursuant to 19 U.S.C. § 1337(d)(1), excluding from entry into the United States certain laptops, desktops, servers, mobile phones, tablets, and components thereof that are imported, sold for importation, or sold

after importation by the Proposed Respondents or any of their affiliate companies, parents, subsidiaries, licensees, or other related business entities, or their successors or assigns that infringe one or more claims of the Asserted Patents, including, without limitation, the specific Accused Products identified in this Complaint and the exhibits hereto;

- d) Issue permanent orders, pursuant to 19 U.S.C. § 1337(f), directing Proposed Respondents and any of their principals, stockholders, officers, directors, employees, agents, distributors, controlled (whether by stock ownership or otherwise) and majority-owned business entities, successors, and assigns to cease and desist from importing, selling, selling for importation, offering for sale, using, demonstrating, promoting, marketing, and/or advertising in the United States Respondents' laptops, desktops, servers, mobile phones, tablets, and components thereof that infringe one or more claims of the Asserted Patents, including, without limitation, the specific Accused Products identified in this Complaint and the exhibits hereto;
- e) Impose a bond on importation and sales of infringing products during the 60-day Presidential review period pursuant to 19 U.S.C. § 1337(j); and
- f) Grant all such other and further relief as it deems appropriate under the law, based upon the facts complained of herein and as determined by the investigation.

Dated: July 30, 2021

Respectfully submitted,

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Counsel for Complainant Sonrai Memory Ltd.

**THE UNITED STATES INTERNATIONAL TRADE COMMISSION
WASHINGTON, D.C.**

In the Matter of

**CERTAIN LAPTOPS, DESKTOPS,
SERVERS, MOBILE PHONES,
TABLETS, AND COMPONENTS
THEREOF**

§
§
§
§
§
§

Investigation No. 337-TA-_____

I, Gerald Padian, declare, in accordance with 19 C.F.R. § 210.12(a)(1), as follows:

1. I am a Director of Sonrai Memory Ltd. and I am duly authorized to sign this Complaint;
2. I have read the Complaint and am aware of its contents;
3. The Complaint is not being presented for any improper purpose, such as to harass or to cause unnecessary delay or needless increase in the cost of the investigation or related proceeding;
4. To the best of my knowledge, information and belief founded upon reasonable inquiry, claims, defenses, and other legal contentions therein are warranted by existing law or by a non-frivolous argument for the extension, modification, or reversal of existing law or the establishment of new law;
5. The allegations and other factual contentions have evidentiary support or are likely to have evidentiary support after a reasonable opportunity for further investigation or discovery.

I declare under the penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on July 29, 2021



Gerald Padian
Sonrai Memory Ltd.