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HAND DELIVERY

The Honorable Marilyn R. Abbott
Secretary
U.S. International Trade Commission
500 E Street, S.W.
Washington, DC 20436

**Re: Certain Cold Cathode Fluorescent Lamp ("CCFL") Inverter
Circuits and Products Containing Same**

DEC 15 2008
OFFICE OF THE SECRETARY
U.S. INTERNATIONAL TRADE COMMISSION

Dear Secretary Abbott:

Enclosed for filing on behalf of O2 Micro International Ltd. and O2 Micro Inc. ("collectively O2 Micro") are the following documents in support of O2 Micro's request that the Commission commence an investigation pursuant to section 337 of the Tariff Act of 1930, as amended. Pursuant to the Commission Rules of Practice and Procedure, a request for confidential treatment of Confidential Exhibits 34-48 is concurrently being transmitted with this filing. O2 Micro submits the following:

1. an original and twelve (12) copies of O2 Micro's verified Complaint (Rule 210.8 (a));
2. an original and six (6) copies of the exhibits to the Complaint with the confidential exhibits 34-48 segregated from the non-confidential exhibits (original plus one copy unbound, without tabs (Rules 201.6(c), 210.4(f)(3)(i) and 210.8(a));
3. ten (10) additional copies of the Complaint and accompanying exhibits, both confidential and non-confidential, for service upon the proposed respondents Monolithic Power Systems Inc., Microsemi Corporation, ASUSTeK Computer Inc., ASUSTeK Computer International America, LG Electronics, LG Electronics U.S.A., LG Display Co., Ltd., LG Display America, Inc., BenQ Corporation and BenQ America Corp. and two (2) additional copies of the verified Complaint and accompanying non-confidential exhibits for service upon the Taipei Economic and Cultural Representative Office and the Embassy of the Republic of Korea (Rules 210.4(f)(3)(i), 210.8(a) and 210.11(a));
4. certified copies of U.S. Patent Nos. 7,417,382 ("the '382 patent"), 6,856,519 ("the '519 patent"), 6,809,938 ("the '938 patent") and 7,120,035 ("the '035 patent") (legible copies of the patents are included in the Complaint as Exhibits 1-4 (Rule 210.12(a)(9)(i)));

Confidential Exhibit 39: Claim Chart demonstrating practice of claim 1 of '938 patent by CCFL inverter circuit with OZ9RRA, which contains proprietary technical information that is not publicly available;

Confidential Exhibit 40: Claim Chart demonstrating practice of claim 1 of '938 patent by CCFL inverter circuit with OZ9936, which contains proprietary technical information that is not publicly available;

Confidential Exhibit 41: Claim Chart demonstrating practice of claim 4 of '035 patent by CCFL inverter circuit with OZ9RRA, which contains proprietary technical information that is not publicly available;

Confidential Exhibit 42: Claim Chart demonstrating practice of claim 4 of '035 patent by CCFL inverter circuit with OZ9936, which contains proprietary technical information that is not publicly available;

Confidential Exhibit 43: Total Volume and Revenue from OZ960, OZ964, OZ9RRA and OZ9936, which contains proprietary business information that is not publicly available;

Confidential Exhibit 44: Wafer Supply Agreement, which contains proprietary business and technical information that is not publicly available;

Confidential Exhibit 45: O2 Micro's Investment in its U.S. Facility Where Designing, Developing, Testing and Support for OZ960, OZ964, OZ9RRA and OZ9936 Occurs, containing proprietary business information that is not publicly available;

Confidential Exhibit 46: O2 Micro's Approximate Dollar Investment in Designing, Developing, Testing and Support for OZ960, OZ964, OZ9RRA and OZ9936, containing proprietary business information that is not publicly available;

Confidential Exhibit 47: O2 Micro's Expenditures in Fabrication Facility where OZ964, OZ9RRA and OZ9936 are Fabricated, containing proprietary business information that is not publicly available; and


Confidential Exhibit 48: O2 Micro's Employees Engaged In Designing, Developing, Testing and Support for OZ960, OZ964, OZ9RRA and OZ9936, which contains proprietary business information that is not publicly available.

The information described above qualifies as confidential business information pursuant to Rule 201.6(a) in that:

- a) it is not available to the public;
- b) unauthorized disclosure of such information could cause substantial harm to the competitive position of Complainant O2 Micro; and

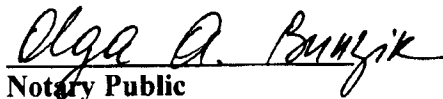
- c) the disclosure of which could impair the Commission's ability to obtain information necessary to perform its statutory function.

Respectfully submitted,



Bert C. Reiser
Counsel for Complainants
O2 Micro International Ltd. and
O2 Micro Inc.

SUBSCRIBED AND SWORN before me the 15th day of December, 2008


Notary Public

**Olga A. Bunzik
Notary Public, District of Columbia
My Commission Expires 8-14-2010**

UNITED STATES INTERNATIONAL TRADE COMMISSION
WASHINGTON, D.C.

In the Matter of)
)
)

CERTAIN COLD CATHODE FLUORESCENT)
LAMP ("CCFL") INVERTER CIRCUITS AND)
PRODUCTS CONTAINING SAME)
)

Investigation No. 337-TA-____

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

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EXHIBIT LIST

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2. U.S. Patent No. 6,856,519
3. U.S. Patent No. 6,809,938
4. U. S. Patent No. 7,120,035
5. Assignment for '382 patent
6. Assignment for '519 patent
7. Assignments for '938 and '035 patents
8. Form 10-K/A Monolithic Power Systems Inc., filed May 12, 2008
9. MPS Company Information from http://www.monolithicpower.com/cmp_01_info.htm, dated September 19, 2008
10. Backlight – CCFL Drivers Parametric Table from <http://products.monolithicpower.com/Products/ParametricTable.do?categoryId=17>, dated September 19, 2008
11. Form 10-K Microsemi Corporation for the fiscal year ended September 30, 2007
12. Company Profile from <http://www.microsemi.com/aboutus.asp>, dated September 5, 2008
13. products: CCFL Backlight Controller IC, from http://www.microsemi.com/catelog/parmlist.asp?P0_CAT=PM&P1_TYPE=BLIC&LVP=1&LVP1=0, dated September 5, 2008
14. Photographs of the ASUSTeK F5RL-B2 notebook PC containing an inverter circuit with MPS MP1010BEP
15. Photographs of the LG 32LB9D 32” LCD television containing an inverter circuit with Microsemi LX1691
16. LGE US Division from http://us.lge.com/about/company/lge_us.jsp, dated September 25, 2008
17. Form 20-F LG Display Co., Ltd. filed April 16, 2008
18. BenQ Group from <http://benq.com/page/?pageId--477>, dated November 14, 2008
19. Products from <http://www.benq.us/products/>, dated November 18, 2008

20. Offer for Sale of E2200HD from <http://store.benq.us/benq-us/searchresults.aspx?keyword=E2200HD&culture=en-US>, dated November 18, 2008
21. Photographs of the BenQ E2200HD Series LCD Monitor containing an inverter circuit with MPS MP1009
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 - C. Schematic of inverter circuit with MP1010B in ASUSTeK F5RL-B2
 - D. Test results from inverter circuit with MP1010B in ASUSTeK F5RL-B2
23. Claim Chart showing infringement of independent claims 1 and 8 of the '382 Patent by LG 32BL9D 32" LCD television with LX1691
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 - B. LX1691 Datasheet
 - C. Schematic of inverter circuit with LX1691 in LG 32LB9D
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24. Claim Chart showing infringement of claim 7 of the '519 patent by BenQ E2200HD LCD monitor with the MP1009 inverter circuit
25. Claim Chart showing infringement of independent claim 1 of the '938 patent by BenQ E2200HD LCD monitor with inverter circuit with MP1009
26. Claim Chart showing infringement of claim 4 of the '035 patent by BenQ E2200HD LCD monitor with inverter circuit with MP1009
27. Photographs of the BenQ E2200HD LCD monitor with MP1009
28. Schematic of the inverter circuit with MP1009 in BenQ E2200HD
29. Test results from inverter circuit with MP1009 in BenQ E2200HD
30. Complaint for Declaratory Judgment
31. Receipt reflecting purchase of ASUS F5RL-B2 notebook PC
32. Receipt reflecting purchase of LG 32BL9D 32" LCD television
33. Receipt reflecting purchase of BenQ E2200HD LCD monitor

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 - A. **CONFIDENTIAL:** OZ960 Datasheet
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 - B. **CONFIDENTIAL:** OZ964 Preliminary Datasheet
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 - A. **CONFIDENTIAL:** OZ9RRA Datasheet
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44. **CONFIDENTIAL:** Wafer Supply Agreement

45. **CONFIDENTIAL:** O2 Micro's Investment in its U.S. Facility Where Designing, Developing, Testing and Support for OZ960, OZ964, OZ9RRA and OZ9936 Occurs
46. **CONFIDENTIAL:** O2 Micro's Approximate Dollar Investment in Designing, Developing, Testing and Support for OZ960, OZ964, OZ9RRA and OZ9936
47. **CONFIDENTIAL:** O2 Micro's Expenditures in Fabrication Facility where OZ964, OZ9RRA and OZ9936 are Fabricated
48. **CONFIDENTIAL:** O2 Micro's Employees Engaged In Designing, Developing, Testing and Support for OZ960, OZ964, OZ9RRA and OZ9936

I. INTRODUCTION

1.1 Complainants O2 Micro International Ltd. and O2 Micro Inc. (collectively hereinafter “O2 Micro” or “Complainants”) request the U.S. International Trade Commission (“ITC”) to commence an investigation pursuant to section 337 of the Tariff Act of 1930, as amended, 19 U.S.C. § 1337(a)(1)(B)(i) (“section 337”), and to remedy the unlawful importation into the United States, the sale for importation, and/or the sale within the United States after importation by the owner, importer, or consignee, of articles covered by valid and enforceable United States patents owned by O2 Micro International Ltd.

1.2 The proposed respondents, Monolithic Power Systems Inc. (“MPS”), Microsemi Corporation (“Microsemi”), ASUSTeK Computer Inc., ASUSTeK Computer International America (collectively “ASUSTeK”), LG Electronics, LG Electronics U.S.A., LG Display Co, Ltd., LG Display America, Inc. (collectively “LG”), BenQ Corporation and BenQ America Corp. (collectively “BenQ”) (all collectively “Respondents”), have engaged in unfair acts in violation of section 337 through the unlicensed importation, sale for importation and/or sale after importation of certain cold cathode fluorescent lamp (“CCFL”) inverter circuits with MPS or Microsemi inverter controllers and products containing the same covered by one or more claims of Complainants’ U.S. Patent Nos. 7,417,382 (“the ‘382 patent”), 6,856,519 (“the ‘519 patent”), 6,809,938 (“the ‘938 patent”), and 7,120,035 (“the ‘035 patent”).

1.3 Certified copies of the ‘382, ‘519, ‘938 and ‘035 patents accompany this complaint as **Exhibits 1, 2, 3, and 4**. O2 Micro International Ltd. owns by assignment the entire right, title and interest in and to these patents. Certified copies of the recorded assignments of these patents accompany this complaint as **Exhibit 5, 6, and 7**.

1.4 As required by section 337(a)(2) and defined by section 337(a)(3), an industry exists in the United States relating to certain CCFL inverter circuits and products containing the same protected by the asserted patents. The domestic industry for the asserted patents includes O2 Micro's substantial United States investments and expenditures in activities, including the designing, developing, manufacturing, testing and support, of CCFL inverter circuits that utilize and exploit the inventions claimed in the asserted patents.

1.5 O2 Micro seeks exclusion orders pursuant to section 337(d) excluding from entry into the United States Respondents' CCFL inverter circuits and products containing Respondents' infringing CCFL inverter circuits covered by one or more claims of the asserted patents. O2 Micro further seeks cease and desist orders directed to Respondents to halt the importation, marketing, advertising, demonstration, warehousing of inventory for distribution, sale and use of such imported products in the United States pursuant to section 337(f).

II. COMPLAINANTS

2.1 Complainant O2 Micro International Ltd. is a corporation organized under the laws of the Cayman Islands with its principal place of business at The Grand Pavilion, West Bay Road, PO Box 32331 SMB, George Town, Grand Cayman, Cayman Islands. O2 Micro International Ltd. designs, develops and markets high performance integrated circuits for power management and security operations, as well as systems security solutions. O2 Micro's 2007 Annual Report is available on O2 Micro's website at: <http://phx.corporate-ir.net/phoenix.zhtml?c=123458&p=irol-reportsannual>.

2.2 Complainant O2 Micro Inc. is a wholly owned subsidiary of O2 Micro International Ltd. located at 3118 Patrick Henry Drive, Santa Clara California. O2 Micro Inc.

designs, develops, tests, sells and supports O2 Micro's products, including its family of CCFL inverter controllers for its inverter circuit designs.

2.3 In introducing its CCFL inverter controllers for its inverter circuit designs, O2 Micro revolutionized the way to safely and efficiently control power in backlighting for liquid crystal displays ("LCDs"). Since that time, O2 Micro's innovations for controlling power to LCD backlighting have become widely accepted by leading notebook computer, LCD TV and LCD monitor companies. O2 Micro continues to invest millions of dollars in research and development of not only new products, but also in existing products, such as its CCFL inverter controllers for inverter circuits, to maintain its competitiveness. This development activity occurs primarily in the United States.

2.4 O2 Micro has sought and obtained patent protection in the United States for a number of inventions relating to CCFL inverter circuits, including the inventions claimed in the '382, '519, '938 and '035 patents.

III. PROPOSED RESPONDENTS

3.1 Respondent Monolithic Power Systems Inc. ("MPS") is a Delaware corporation with its corporate headquarters located at 6409 Guadalupe Mines Road, San Jose, California. Upon information and belief, MPS manufactures, markets, sells for importation, imports and/or sells after importation into the United States analog and mixed-signal semiconductors, including those for infringing CCFL inverter circuits. *See Exhibit 8 at 28.* Upon further information and belief, MPS manufactures its infringing CCFL inverter controllers for inverter circuits overseas and sells these infringing CCFL inverter controllers for inverter circuits to original equipment manufacturers for importation into the United States in various products, including notebook

computers, LCD televisions and LCD displays. *See Exhibit 8 at 7, 10 and Exhibit 9.* Examples of these infringing CCFL inverter controllers for inverter circuits include, but are not limited to, the following MPS product families MP1009, MP1010B, MP1026, MP1038, and MP1048. *See Exhibit 10.*

3.2 Respondent Microsemi Corporation (“Microsemi”) is a Delaware corporation located at 2381 Morse Avenue, Irvine, California. Upon information and belief, Microsemi manufactures, markets, sells for importation, imports and/or sells after importation into the United States analog and mixed-signal integrated circuits and semiconductors, including infringing CCFL inverter controllers for inverter circuits. *See Exhibits 11 at 6, 52 and Exhibit 12.* Upon further information and belief, Microsemi sells its infringing CCFL inverter controllers for inverter circuits to original equipment manufacturers for importation into the United States in various products, including notebook computers, LCD televisions and LCD displays. *See Exhibit 11 at 6.* Examples of Microsemi’s infringing CCFL inverter controllers for inverter circuits include, but are not limited to, the following product families: LX1686; LX1688; LX1689; LX1691; LX1692; LX1692A; LX 1693; LX1695; LX1696; LX1697; LX6501; and LX6512. *See Exhibit 13.*

3.3 Respondent ASUSTeK Computer Inc. is a Taiwanese corporation located at No. 15, Li-Te Road, Peitou, Taipei, Taiwan. Upon information and belief, ASUSTeK Inc. manufactures, sells for importation, imports and/or sells after importation into the United States notebook computers and/or LCD monitors that contain infringing CCFL inverter circuits with MPS inverter controllers. An example of such a product is the F5RL-B2 notebook computer. *See Exhibit 14.*

3.4 Respondent ASUSTeK Computer International America is located at 800 Corporate Way, Fremont California. ASUSTeK Computer International America is a wholly owned subsidiary of ASUSTeK Computer Inc. Upon information and belief, ASUSTeK Computer International America sells for importation, imports and/or sells after importation into the United States notebook computers and/or LCD monitors that contain infringing CCFL inverter circuits with MPS inverter controllers.

3.5 Respondent LG Electronics (“LG”) is a Korean corporation located at LG Twin Towers 20, Yoido-dong, Youngdungpo-gu, Seoul, Korea. Upon information and belief, LG manufactures, sells for importation, imports and/or sells after importation into the United States notebook computers and/or LCD televisions that contain infringing CCFL inverter circuits with Microsemi inverter controllers. An example of such a product is the 32LB9D LCD television. *See Exhibit 15.*

3.6 Respondent LG Electronics U.S.A. is a Delaware corporation and a wholly owned subsidiary of LG Electronics whose office is located at 1000 Sylvan Avenue, Englewood Cliffs, New Jersey. Upon information and belief LG Electronics U.S.A. markets, imports and/or sells after importation in the United States the notebook computers and/or LCD televisions that contain infringing CCFL inverter circuits manufactured and designed by LG Electronics. *See Exhibits 15 and 16.*

3.7 Respondent LG Display Co., Ltd. (“LG Display”) is a Korean corporation located at West Tower, LG Twin Towers, 20, Yoido-dong, Youngdungpo-gu, Seoul, Korea. Upon information and belief, LG Display designs, manufactures, sells for importation, imports and/or sells after importation into the United States LCD panels that contain infringing CCFL inverter circuits, primarily for use in televisions, notebook computers and desktop monitors. *See*

Exhibit 17 at 26, 32. LG Display is a subsidiary of LG Electronics. *Id.* Further upon information and belief, LG Display manufactures its LCD panels outside of the United States in Korea, Poland and China. **Exhibit 17 at 27.**

3.8 Respondent LG Display America, Inc. (“LG Display America”) is a California corporation located at 150 East Brokaw Road, San Jose, CA 95112. LG Display America is a wholly owned subsidiary of LG Display. **Exhibit 17 at 42.** Upon information and belief, LG Display America sells for importation, imports and/or sells after importation into the United States TFT-LCD panels with infringing CCFL inverter circuits. **Exhibit 17 at 36.**

3.9 Respondent BenQ Corporation is a Taiwanese corporation located at 16 Jihu Road, Neihu, Taipei 114, Taiwan. Upon information and belief, BenQ manufactures, sells for importation, imports and/or sells after importation into the United States notebook computers, LCD displays and/or LCD panel televisions that contain infringing MPS CCFL inverter circuits. *See Exhibit 18.* An example of such a product is the E2200HD Series LCD Monitor containing the MP1009. *See Exhibit 19.*

3.10 Respondent BenQ America Corp. is a California corporation and a wholly owned subsidiary of BenQ Corporation whose office is located at 15375 Barranca, Suite A205, Irvine, California. Upon information and belief BenQ America Corp. markets, imports and/or sells after importation in the United States the notebook computers, LCD displays and/or LCD panel televisions that contain infringing CCFL inverter circuits. *See Exhibits 20 and 21.*

3.11 Upon information and belief, MPS and Microsemi sell their CCFL inverter controllers for inverter circuits directly or indirectly to their customers overseas, such as AUSTeK, LG Display, LG and BenQ. These CCFL inverter circuits are then placed into

products, such as LCD panels, notebook computers, LCD televisions and/or LCD monitors, which are sold for importation, imported and/or sold after importation into the United States by numerous companies including BenQ, LG and ASUSTeK.

IV. THE PRODUCTS AT ISSUE

4.1 The products at issue in this investigation are certain CCFL inverter circuits and products containing the same.

4.2 A notebook computer screen or other LCD display requires a white light behind it to display all the colors. This white light is generated by one or more fluorescent tubes, which, unlike regular fluorescent tubes, do not generate much heat and are therefore known as cold cathode fluorescent lamps, or CCFLs. These CCFLs require up to 1200 volts or more of alternating current (AC) to light up (depending upon the geometry of the CCFLs). Changing voltage from a direct current (DC) battery to about 1200 volts or more AC requires a circuit named an inverter. An inverter controller circuit is also known as a DC-to-AC converter circuit. The high voltage delivered by the inverter circuit excites gas inside the lamp, and the energized ions absorbed by the phosphor coating on the lamp emit light.

4.3 O2 Micro designs and develops CCFL inverter circuits that are used in computer notebooks, televisions and LCD monitors. Examples from O2Micro's family of CCFL inverter circuits include the OZ960, OZ964, OZ9RRA, and OZ9936.

4.4 Upon information and belief, Respondents sell for importation, import, and sell after importation certain CCFL inverter circuits and products containing the same that infringe the asserted patents.

V. THE PATENT-IN-SUIT

A. The '382 Patent

1. Identification of the Patent and Ownership by O2 Micro

5.1 U.S. Patent No. 7,417,382 (“the ‘382 patent”) (**Exhibit 1**), entitled “High-Efficiency Adaptive DC/AC Converter,” was issued on August 26, 2008. O2 Micro International Ltd. is the assignee (*see Exhibit 5*) and Yung-Lin Lin is named as the sole inventor.

5.2 Pursuant to Rule 210.12(c) of the Commission’s Rules of Practice and Procedure, this Complaint is accompanied by the following: (1) a certified copy and three additional copies of the prosecution history of the ‘382 patent (bearing bates nos. O2ITC 000001 - O2ITC 015794); and (2) four copies of each reference document mentioned in the prosecution history (bearing bates nos. O2ITC 015795 - O2ITC 034046).

2. Non-Technical Description of the Patented Invention

5.3 The ‘382 patent involves technology for safely providing power to light liquid crystal displays (LCDs) in notebook computers, computer monitors, LCD TVs, portable DVD players, and other consumer electronic products.

5.4 The ‘382 patent provides an improved inverter circuit for controllably delivering power to CCFLs. An inverter circuit receives DC, but CCFLs only work with AC. DC is converted to AC by turning one or more pairs of switches on and off. The switches are coupled to a transformer. When the on-time of two switches (or sets of switches) overlaps, voltage is applied to the transformer. The transformer creates a magnetic field with a pair of wire windings: one winding defines the primary side of the transformer and the other defines the secondary side of the transformer. Due to the characteristics of the windings, when a certain voltage (for example 12V or 20V) is applied to the primary side, a much higher voltage (at times

exceeding 1,000V) exits the secondary side. Because the voltage is stepped up in this manner, the transformer is known as a step-up transformer. The inverter circuit precisely controls the amount of power delivered to the CCFL by selectively turning on and off the switches. The longer that the switches are conducting and thus the transformer is being energized, the more power that is delivered to the CCFL.

5.5 The '382 patent invention also includes protection circuitry. Because a CCFL requires high voltage, a broken or disconnected lamp (known as an "open lamp condition") creates a danger of sparking, equipment damage, or even injury to the user. But in normal use, the voltage also must be high to cause the lamp to light in the first instance (after which the voltage level drops into a normal operating range). As a result, the high voltage during the start-up period could be confused with high voltage resulting from an open lamp condition. To protect the equipment and the user, but allow the CCFL to operate properly in normal conditions, the '382 patent utilizes a capacitor divider to provide a signal representing the voltage across the CCFL. That signal travels down a feedback signal line to a timer circuit, which has a predetermined time-out duration that is triggered when the voltage is above a certain level. If the voltage remains too high after the time-out duration, the protection circuit shuts down the switches and thereby turns off the CCFL.

3. Foreign Counterparts Sharing the '382 Patent Written Description

5.6 The following is a list of the foreign patents and applications sharing the same written description as the '382 patent:

Country	Type	Number	Status
China	Patent Application	01102605.7	Published/Rejected
China	Patent Application	200710000473	Published
China	Patent (Utility Model)	0420001507	Granted but held invalid in Reexamination
Taiwan	Patent	152318	Granted; Reexamination Pending
Japan	Patent Application	2001-8143	Abandoned
Korea	Patent Application	2001-1901	Abandoned

5.7 Complainant certifies that there are no other foreign patents or patent applications sharing the same written description as the ‘382 patent that have been issued, abandoned, denied or remain pending.

B. The ‘519 Patent

1. Identification of the Patent and Ownership by O2 Micro

5.8 U.S. Patent No. 6,856,519 (“the ‘519 patent”) (**Exhibit 2**), entitled “Inverter Controller,” was issued on February 15, 2005. O2 Micro International Ltd. is the assignee (*see Exhibit 6*) and Yung-Lin Lin and Da Liu are named as the inventors.

5.9 Pursuant to Rule 210.12(c) of the Commission’s Rules of Practice and Procedure, this Complaint is accompanied by the following: (1) a certified copy and three additional copies of the prosecution history of the ‘519 patent (bearing bates nos. O2ITC 034047-O2ITC 034480); and (2) four copies of each reference document mentioned in the prosecution history (bearing bates nos. O2ITC 034481-O2ITC 036664).

2. Non-Technical Description of the Patented Invention

5.10 The '519 patent involves technology related to a system that includes an inverter circuit that generates an alternating current (AC) signal to power one or more cold cathode fluorescent (CCFL) lamps. CCFLs are used to illuminate liquid crystal displays in notebook computers, computer monitors, LCD TVs, portable DVD players, and other consumer electronic products.

5.11 The '519 patent provides improvements to the inverter controller that controls the operation of the CCFL inverter circuit by providing for at least one input pin that is configured to receive at least two independent input signals. The independent input signals each support an associated function of the controller during its operation.

5.12 The use of one or more multifunctional pins used for CCFL inverters as taught by the '519 patent may, for example, results in a reduction of the number of pins needed for an inverter controller and correspondingly provides a benefit to inverter circuit manufacture by decreasing pin count and cost, while maintaining the same functionality.

3. Foreign Counterparts Sharing the '519 Patent Written Description

5.13 The following is a list of the foreign patents and applications sharing the same written description as the '519 patent:

Country	Type	Number	Status
China	Patent	03104111.6	Granted
Hong Kong	Patent	HK1062503	Granted
Japan	Patent	3803652	Granted
Japan	Patent Application	2006-88813	Published
Korea	Patent Application	2003-28509	Pending
Taiwan	Patent	I256764	Granted

5.14 Complainant certifies that there are no other foreign patents or patent applications sharing the same written description as the '519 patent that have been issued, abandoned, denied or remain pending.

C. The '938 Patent

1. Identification of the Patent and Ownership by O2 Micro

5.15 U.S. Patent No. 6,809,938 ("the '938 patent") (**Exhibit 3**), entitled "Inverter Controller," was issued on October 26, 2004. O2 Micro International Ltd. is the assignee (*see Exhibit 7*) and Yung-Lin Lin and Da Liu are named as the inventors. This patent is a division of Application No. 10/139,169 issued as the '519 patent.

5.16 Pursuant to Rule 210.12(c) of the Commission's Rules of Practice and Procedure, this Complaint is accompanied by the following: (1) a certified copy and three additional copies of the prosecution history of the '938 patent (bearing bates nos. O2ITC 036665-O2ITC 036740); and (2) four copies of each reference document mentioned in the prosecution history (bearing bates nos. O2ITC 036741-O2ITC 036790).

2. Non-Technical Description of the Patented Invention

5.17 The '938 patent involves technology related to an inverter circuit for converting a direct current (DC) signal into a stepped-up alternating current (AC) signal. The inverter circuit includes power switches, a step-up transformer, and an inverter controller that work together to perform the conversion. For example, the power switches are used to convert a DC signal to an AC signal, a step-up transformer is used to step-up or boost the signal, and the inverter controller generates signals used to drive the power switches to power a load.

5.18 The '938 patent provides improvements to the inverter controller associated with the stepped-up transformer by providing for at least one input pin that is configured to receive at least two independent input signals. The independent input signals each support an associated function of the controller during its operation.

5.19 The use of one or more multifunctional pins used for inverters associated with step-up transformers, as taught by the '938 patent, may, for example, result in a reduction of the number of pins needed for an inverter controller and correspondingly provide a benefit to inverter circuit manufacture by decreasing pin count and cost while maintaining the same functionality.

3. Foreign Counterparts Sharing the '938 Patent Written Description

5.20 The following is a list of the foreign patents and applications sharing the same written description as the '938 patent:

Country	Type	Number	Status
China	Patent	03104111.6	Granted
Hong Kong	Patent	HK1062503	Granted
Japan	Patent	3803652	Granted
Japan	Patent Application	2006-88813	Published
Korea	Patent Application	2003-28509	Pending
Taiwan	Patent	I256764	Granted

5.21 Complainant certifies that there are no other foreign patents or patent applications sharing the same written description as the '938 patent that have been issued, abandoned, denied or remain pending.

D. The '035 Patent

1. Identification of the Patent and Ownership by O2 Micro

5.22 U.S. Patent No. 7,120,035 (“the ‘035 patent”) (**Exhibit 4**), entitled “Inverter Controller,” was issued on October 10, 2006. O2 Micro International Ltd. is the assignee (*see Exhibit 7*) and Yung-Lin Lin and Da Liu are named as the inventors. This patent is a division of Application No. 10/139,169 issued as the ‘519 patent.

5.23 Pursuant to Rule 210.12(c) of the Commission’s Rules of Practice and Procedure, this Complaint is accompanied by the following: (1) a certified copy and three additional copies of the prosecution history of the ‘035 patent (bearing bates nos. O2ITC 036791-O2ITC 037069); and (2) four copies of each reference document mentioned in the prosecution history (bearing bates nos. O2ITC 037070-O2ITC 037230).

2. Non-Technical Description of the Patented Invention

5.24 The ‘035 patent involves technology related to inverter controller integrated circuits. The ‘035 patent provides improvements to inverter controllers by providing for at least one input pin that is configured to receive at least two independent input signals.

5.25 The ‘035 patent further relates to characteristics of the input signals that might be received, including, for example, when the signals are present. The independent input signals each support an associated function of the controller during its operation.

5.26 The use of inverter controller integrated circuits such as those that are the subject of the ‘035 patent may, for example, result in a reduction of the number of pins needed for an inverter controller and correspondingly provides a benefit to inverter circuit manufacture by decreasing pin count and cost while maintaining the same functionality.

3. Foreign Counterparts Sharing the '035 Patent Written Description

5.27 The following is a list of the foreign patents and applications sharing the same written description as the '035 patent:

Country	Type	Number	Status
China	Patent	03104111.6	Granted
Hong Kong	Patent	HK1062503	Granted
Japan	Patent	3803652	Granted
Japan	Patent Application	2006-88813	Published
Korea	Patent Application	2003-28509	Pending
Taiwan	Patent	I256764	Granted

5.28 Complainant certifies that there are no other foreign patents or patent applications sharing the same written description as the '035 patent that have been issued, abandoned, denied or remain pending.

VI. UNFAIR ACTS OF THE RESPONDENTS

6.1 Upon information and belief, Respondents' CCFL inverter circuits and products containing the same (the "Accused Products") that infringe at least claims 1, 2, 4, 6, 8, 9, 11 and 13 of the '382 patent have been imported, sold for importation and/or sold after importation into the United States by Respondents. In addition, MPS and ASUSTeK accused products also infringe claims 7 and 14 of the '382 patent. Furthermore, MPS and BenQ's accused products infringe claim 7 of the '519 patent, claims 1, 2, 3, and 6 of the '938 patent and claim 4 of the '035 patent.

6.2 Upon information and belief, the Accused Products are imported, sold for importation and/or sold after importation into the United States by Respondents. Respondents' activities constitute acts of direct and contributory infringement, as well as active inducement to infringe, with respect to at least those claims of the asserted patents identified in paragraph 6.1 above. If continued, such activities will further constitute infringing acts, directly, contributorily and as active inducement to infringe. The Accused Products are especially adapted for, and have

no substantial use other than, infringing the asserted patents. They constitute a material part of the patented inventions, and their sale and promotion actively induces infringement of the patent claims at issue by third parties, including end users. Respondents had notice of the asserted patent since at least the filing of this complaint. Additionally, on information and belief, Respondents had actual knowledge of the asserted patents; for example, with respect to the '519, '938, and '035 patents, MPS filed a declaratory judgment action regarding those patents on or about October 2008 (**Exhibit 30**), which required it to have actual notice at the time. On information and belief, Respondents, including MPS, ASUSTeK, and Microsemi have been in patent litigation with O2Micro before regarding patents in the same family as the '382 patent, and monitor patent activity with respect to O2Micro's patent portfolio. Also on information and belief, O2Micro has notified Respondents in the past about its patent portfolio generally as well as about its ongoing efforts to secure new patents.

6.3 Upon information and belief, MPS and Microsemi supply reference designs for inverter circuits that infringe the '382 patent to other parties who are unknown to O2Micro at this time, and their customers substantially follow the reference designs and therefore infringe claims 1, 2, 4, 6, 8, 9, 11 and 13 of the '382 patent. Upon information and belief, inverter circuits that substantially follow the MPS and Microsemi reference designs are imported, sold for importation and/or sold after importation into the United States, the activities of parties using these reference designs constitute acts of direct and contributory infringement, as well as active inducement to infringe, with respect to at least those claims of the asserted patents identified in this paragraph. If continued, such activities will further constitute infringing acts, directly, contributorily and as active inducement to infringe. These inverter circuits are especially adapted for, and have no substantial use other than, infringing the asserted patents. They constitute a material part of the

patented inventions, and their sale and promotion actively induces infringement of the patent claims at issue by third parties, including end users.

6.4 Upon information and belief, MPS supplies reference designs for inverter circuits that infringe the '519, '938 and '035 patents to other parties who are unknown to O2Micro at this time, and MPS customers substantially follow the reference designs and therefore infringe claim 7 of the '519 patent, claims 1, 2, 3, and 6 of the '938 patent and claim 4 of the '035 patent. Upon information and belief, inverter circuits that substantially follow this MPS reference design are imported, sold for importation and/or sold after importation into the United States, the activities of parties using this reference design constitute acts of direct and contributory infringement, as well as active inducement to infringe, with respect to at least those claims of the asserted patents identified in this paragraph. If continued, such activities will further constitute infringing acts, directly, contributorily and as active inducement to infringe. These inverter circuits are especially adapted for, and have no substantial use other than, infringing the asserted patents. They constitute a material part of the patented inventions, and their sale and promotion actively induces infringement of the patent claims at issue by third parties, including end users.

6.5 A claim chart demonstrating how independent claims 1 and 8 of the '382 patent apply to the ASUSTeK F5AL-B2 notebook containing the CCFL inverter circuit with MPS 1010BEP is attached as **Exhibit 22**. Documents referenced in this claim chart are attached hereto as **Exhibits 22A-D**. O2Micro took the photographs of the ASUSTeK F5AL-B2 attached hereto as **Exhibit 22A**, drew the schematic of the inverter circuit found in that product attached hereto as **Exhibit 22C**, and printed test data for the product attached here to as **Exhibit 22D**. **Exhibit 22B** is a publicly available datasheet of the MPS 1010B. Upon information and belief, MPS customers utilize MPS' inverter circuit reference design in substantially the same manner as

shown regarding ASUSTeK F5AL-B2 notebook containing the CCFL inverter circuit with MPS model number 1010BEP.

6.6 A claim chart demonstrating how independent claims 1 and 8 of the '382 patent apply to the LG 32BL9D 32" LCD television containing the CCFL inverter circuit with Microsemi model number LX1691a is attached as **Exhibit 23**. Documents referenced in this claim chart are attached hereto as **Exhibits 23A-D**. O2Micro took the photographs of the LG 32BL9D attached hereto as **Exhibit 23A**, drew the schematic of the inverter circuit found in that product attached hereto as **Exhibit 23C**, and printed test data for the product attached here to as **Exhibit 23D**. **Exhibit 22B** is a publicly available datasheet of the Microsemi LX1691. Upon information and belief, Microsemi customers utilize Microsemi's inverter circuit reference design in substantially the same manner as shown regarding the LG 32BL9D 32" LCD television containing the CCFL inverter circuit with Microsemi model number LX1691a.

6.7 A claim chart demonstrating how claim 7 of the '519 patent applies to the BenQ E2200HD LCD monitor containing the CCFL inverter circuit with MPS model number MP1009 is attached as **Exhibit 24**. Documents referenced in this claim chart are attached hereto as **Exhibits 24, 27-30**. O2Micro took the photographs of the BenQ E2200HD attached hereto as **Exhibit 27**, drew the schematic of the inverter circuit found in that product attached hereto as **Exhibit 28**, and printed test data for the product attached here to as **Exhibit 29**. Upon information and belief, MPS customers utilize MPS' inverter circuit reference design in substantially the same manner as shown regarding the BenQ E2200HD LCD monitor containing the CCFL inverter circuit with MPS model number MP1009.

6.9 A claim chart demonstrating how independent claim 1 of the '938 patent applies to the BenQ E2200HD LCD monitor containing the CCFL inverter circuit with MPS model

number MP1009 is attached as **Exhibit 25**. Documents referenced in this claim chart are attached hereto as **Exhibits 25, 27-30**. Upon information and belief, MPS customers utilize MPS' inverter circuit reference design in substantially the same manner as shown regarding the BenQ E2200HD LCD monitor containing the CCFL inverter circuit with MPS model number MP1009.

6.8 A claim chart demonstrating how independent claim 4 of the '035 patent applies to the BenQ E2200HD LCD monitor containing the CCFL inverter circuit with MPS model number MP1009 is attached as **Exhibit 26**. Documents referenced in this claim chart are attached hereto as **Exhibits 26-30**. Upon information and belief, MPS customers utilize MPS' inverter circuit reference design in substantially the same manner as shown regarding the BenQ E2200HD LCD monitor containing the CCFL inverter circuit with MPS model number MP1009.

VII. SPECIFIC INSTANCES OF UNFAIR IMPORTATION AND SALE

7.1 Upon information and belief, Respondents' CCFL inverter circuits and products containing the same are sold for importation into the United States, imported into the United States or sold after importation into the United States.

7.2 Attached as **Exhibit 31** is a copy of a receipt reflecting the sale of a CCFL inverter circuit and ASUSTeK notebook computer in the United States. **Exhibit 14** includes photographs of the ASUSTeK notebook Model No. F5AL-B2. As can be seen in these photographs, the packaging for the ASUSTeK F5AL-B2 and the notebook itself are labeled "MADE IN CHINA" In addition, **Exhibit 14** includes photographs of the panel of the ASUSTeK F5AL-B2 notebook computer on which a CCFL inverter with MPS model No. 1010BEP, is mounted.

7.3 Attached as **Exhibit 32** is a copy of a receipt reflecting the sale of a LG 32BL9D 32” LCD television in the United States. **Exhibit 15** includes photographs of the packaging for the LG 32BL9D 32” LCD television and the television itself. As can be seen in these photographs, the packaging for the LG 32BL9D 32” LCD television and the television itself are labeled “MADE IN KOREA” and “Assembled in Mexico.” In addition, **Exhibit 15** includes photographs of the board for the LG 32BL9D 32” LCD television showing the CCFL inverter circuit with Microsemi model number LX1691a.

7.4 Attached as **Exhibit 33** is a copy of a receipt reflecting the sale in the United States of a BenQ E2200HD Series LCD Monitor. **Exhibit 21** includes photographs of the packaging for the BenQ E2200HD Series LCD Monitor and the monitor itself. As can be seen in these photographs, the packaging for the BenQ E2200HD Series LCD Monitor and the monitor itself are labeled “MADE IN CHINA.” In addition, **Exhibit 21** includes photographs of the board for the BenQ E2200HD Series LCD Monitor showing the CCFL inverter circuit with MPS model number MP1009.

VIII. CLASSIFICATION OF THE INFRINGING PRODUCTS UNDER THE HARMONIZED TARIFF SCHEDULE OF THE UNITED STATES

8.1 Upon information and belief, Respondents’ infringing products may be classified under at least the following headings of the Harmonized Tariff Schedule of the United States: 8542.39.00; 8528.59.30.50; and 8528.72.72.50.

IX. LICENSEES

9.1 O2 Micro has licensed the ‘382, ‘519, ‘938 and ‘035 patents. **Confidential Exhibit 34** is a list of O2 Micro’s licensees under the asserted patents.

X. THE DOMESTIC INDUSTRY

10.1. A domestic industry as defined by section 337(a)(2) and (3) exists in connection with O2 Micro's activities related to CCFL inverter products covered by the '382, '519, '938 and '035 patents. This industry includes O2 Micro's significant investment in plant, equipment, labor and capital in the United States relating to O2 Micros' activities, including the design, development, fabrication, manufacturing, testing of and engineering support for O2 Micro's entire product line of CCFL inverter products covered by the patents at issue.

A. O2 Micro's Exploitation of the Asserted Patent

10.2 For purposes of establishing domestic industry, O2 Micro states that it conducts activities in the United States relating to at least the OZ960 and OZ964 CCFL inverter circuits, which are covered by at least claim 1 of the '382 patent, and at least the OZ9RRA and OZ9936 CCFL inverter circuits, which are covered by at least claim 1 of the '519 patent, claim 1 of the '938 patent and claim 4 of the '035 patent. These four products are merely representative of O2 Micro's family of CCFL inverter products that utilize the patented inventions. These products practice the asserted claims when used by O2 Micro's domestic customers.

10.3 A claim chart applying claim 1 of the '382 patent to O2 Micro's OZ960 is attached as **Confidential Exhibit 35**. Documents referenced in this claim chart are attached hereto as **Confidential Exhibit 35A**. This chart demonstrates O2 Micro's practice of the '382 patent by a CCFL inverter circuit with its OZ960.

10.4 A claim chart applying claim 1 of the '382 patent to O2 Micro's OZ964 is attached as **Confidential Exhibit 36**. Documents referenced in this claim chart are attached

hereto as **Confidential Exhibit 36A-B**. This chart demonstrates O2 Micro's practice of the '382 patent by a CCFL inverter circuit with its OZ964.

10.5 A claim chart applying claim 1 of the '519 patent to O2 Micro's OZ9RRA is attached as **Confidential Exhibit 37**. Documents referenced in this claim chart are attached hereto as **Confidential Exhibit 37A**. This chart demonstrates O2 Micro's practice of the '519 patent by a CCFL inverter circuit with its OZ9RRA.

10.6 A claim chart applying claim 1 of the '519 patent to O2 Micro's OZ9936 is attached as **Confidential Exhibit 38**. Documents referenced in this claim chart are attached hereto as **Confidential Exhibit 38A**. This chart demonstrates O2 Micro's practice of the '519 patent by a CCFL inverter circuit with its OZ9936.

10.7 A claim chart applying claim 1 of the '938 patent to O2 Micro's OZ9RRA is attached as **Confidential Exhibit 39**. Documents referenced in this claim chart are attached hereto as **Confidential Exhibit 39A**. This chart demonstrates O2 Micro's practice of the '938 patent by a CCFL inverter circuit with its OZ9RRA.

10.8 A claim chart applying claim 1 of the '938 patent to O2 Micro's OZ9936 is attached as **Confidential Exhibit 40**. Documents referenced in this claim chart are attached hereto as **Confidential Exhibit 40A**. This chart demonstrates O2 Micro's practice of the '938 patent by a CCFL inverter circuit with its OZ9936.

10.9 A claim chart applying claim 4 of the '035 patent to O2 Micro's OZ9RRA is attached as **Confidential Exhibit 41**. Documents referenced in this claim chart are attached hereto as **Confidential Exhibit 41A**. This chart demonstrates O2 Micro's practice of the '035 patent by a CCFL inverter circuit with its OZ9RRA.

10.10 A claim chart applying claim 4 of the '035 patent to O2 Micro's OZ9936 is attached as **Confidential Exhibit 42**. Documents referenced in this claim chart are attached hereto as **Confidential Exhibits 42A**. This chart demonstrates O2 Micro's practice of the '035 patent by a CCFL inverter circuit with its OZ9936.

B. O2 Micro has Significant U.S. Investment in Plant Equipment, Labor and Capital

10.11 O2 Micro has made significant investments in plant, equipment, labor and capital in the United States relating to O2 Micro CCFL inverter circuits that practice the asserted patents, specifically the OZ960, OZ964, OZ9RRA and OZ9936 CCFL inverter circuits. Since their introductions, O2 Micro's sales of these products have been significant. *See Confidential Exhibit 43*. O2 Micro's activities in connection with the '382, '519, '938 and '035 patents, for purposes of the domestic industry requirement of Section 337, in this investigation occur in O2 Micro's facility in Santa Clara, California and at the fabrication facility in Texas utilized by O2 Micro¹.

10.12 O2 Micro has substantially invested in its facility in Santa Clara, California where the CCFL inverter products are designed, developed, tested and supported. **Confidential Exhibit 45** sets forth the square footage and value of O2 Micro's Santa Clara facility.

10.13 O2 Micro's significant investment also includes significant investment in equipment and other capital expenditures such as, salaries, software, creation of prototypes, improvements to the Santa Clara facility and other non-reoccurring engineering costs relating to O2 Micro's efforts associated the OZ960, OZ964, OZ9RRA and OZ9936 CCFL inverter circuits

¹ **Confidential Exhibit 44** is the Supply Agreement between O2 Micro and its fabrication partner.

that practice the '382, '519, '938 and '035 patents. These costs are reflected in **Confidential Exhibit 46**. In addition, O2 Micro has invested significant capital in the Texas fabrication facility used for the fabrication of the OZ964, OZ9RRA and OZ9936 CCFL inverter products. This investment is set forth in **Confidential Exhibit 47**.

10.14 O2 Micro has also invested significant resources of labor in its efforts associated with the OZ960, OZ964, OZ9RRA and OZ9936 CCFL inverter products. See **Confidential Exhibit 48**. This investment includes the man-hours spent in designing, developing, testing, and supporting the OZ960, OZ964, OZ9RRA and OZ9936 inverter products.

XI. RELATED LITIGATION

11.1 The foreign patents that are counterparts sharing the '382 patent specification, which is the subject of this Complaint, are the subject of litigation in the following actions:

- *O2Micro International Limited v. Beyond Innovation Technology Co., Ltd., & Samsung Electronics Co., Ltd.*, Taipei District Court, (92) Chih-tzu No. 21 and (95) Chih-tzu No. 38: O2 Micro sued Samsung and Beyond Innovation Technology for infringement of Taiwan Patent No. 152318. The litigations have been settled and the actions were dismissed.
- *O2Micro International Limited v. Monolithic Power Systems, Inc. & ASUSTeK Computer Inc.*, Taipei District Court, (93) Chih-tzu No. 33: O2 Micro sued MPS and ASUSTeK for infringement of Taiwan Patent No. 152318. This case has been sent to assessment intuition for an opinion on several matters including infringement and invalidity.
- *O2Micro International Limited v. CLEVO Co.*, Banciao District Court, (94) Chung-Chih-tsu No. 14: O2 Micro sued Clevo for infringement of Taiwan Patent No. 152318. The litigation has been settled and the action was dismissed.

11.2 The '519, '938 and '035 patents are the subject of the following litigation:

- *Monolithic Power Systems, Inc. v. O2 Micro International Limited*, C-08-4567 (N.D. Cal.): On October 1, 2008, MPS filed a complaint seeking a declaratory judgment of non-infringement and invalidity against O2 Micro of the '519, '938 and '035 patents and U.S. Patent No. 6,900,993. Although a complaint has been filed, this lawsuit has not yet been served on O2Micro.

11.3 Pursuant to Commission Rule 210.12(a)(5), there are no other court or agency litigation, foreign or domestic, involving the unfair acts or the subject matter of this Complaint.

XII. RELIEF REQUESTED

12.1 WHEREFORE, by reason of the foregoing, Complainant O2 Micro requests that the United States International Trade Commission:

- (a) institute an immediate investigation pursuant to 19 U.S.C. § 1337(a)(1)(B)(i) and (b)(1) into the violations of that section based on Respondents' unlawful importation into the United States, sale for importation into the United States, and/or sale in the United States after importation of certain CCFL inverter Circuits and products containing the same that infringe one or more of the claims of U.S. Patent No. 7,417,382, U.S. Patent No. 6,856,519, U.S. Patent No. 6,809,938 and U.S. Patent No. 7,120,035;
- (b) issue orders pursuant to 19 U.S.C. § 1337(d), excluding from entry into the United States all imported Respondents' CCFL inverter circuits and all products, including notebook computers, LCD panels and LCD televisions, containing Respondents' infringing CCFL inverter circuits, that infringe one or more of the claims of U.S. Patent No. 7,417,382, U.S.

Patent No. 6,856,519, U.S Patent No. 6,809,938 and U.S. Patent No.
7,120,035;

- (c) issue permanent orders pursuant to 19 U.S.C. § 1337(f) directing Respondents to cease and desist from importing, marketing, advertising, demonstrating, warehousing of inventory for distribution, sale and use of CCFL inverter circuits and products containing the same that infringe one or more claims of the patent at issue; and
- (d) grant such other and further relief as the Commission deems appropriate and just under the law, based on the facts complained of herein and determined by the investigation.

Respectfully submitted,



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O2 Micro Inc.*

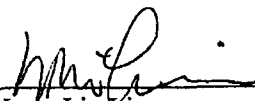
Dated: December 15, 2008

VERIFICATION OF COMPLAINT

I, Yung-Lin Lin, declare, in accordance with 19 C.F.R. 210.4 and 210.12(a), under penalty of perjury, that the following statements are true:

1. I am the Executive Vice-President of Intelligent Lighting Group of O2 Micro, Inc., and I am duly authorized to sign this Complaint on behalf of all of the Complainants;
2. I have read the foregoing Complaint;
3. To the best of my knowledge, information, and belief, based upon reasonable inquiry, the foregoing Complaint is well-founded in fact and is 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;
4. 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; and
5. The foregoing Complaint is not being filed for an improper purpose, such as to harass or cause unnecessary delay or needless increase in the cost of litigation.

Executed this 15th day of December, 2008.



Yung-Lin Lin
Executive Vice-President of
Intelligent Lighting Group
O2 Micro, Inc.