

EXHIBIT A

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

GODO KAISHA IP BRIDGE 1,

Plaintiff,

v.

**OMNIVISION TECHNOLOGIES,
INC.,**

Defendant.

Case No. 1:16-cv-00290-JFB-SRF

**PLAINTIFF'S FIRST AMENDED
INFRINGEMENT CONTENTIONS**

Plaintiff Godo Kaisha IP Bridge 1 (“IPB”) provides its First Amended Infringement Contentions relating the accused products to the asserted claims.

IPB expressly reserves the right to its infringement contentions. For example, and without limitation, IPB’s counsel and expert reviewed OmniVision’s materials this week, and have not yet received materials from that review. Further, Henry Pan stated, in an email dated March 14, 2018, that OmniVision is “concerned with IP Bridge’s basis for its accusations for multiple reasons.” In that email, Mr. Pan provided a list of products that “do not belong to any accused product line.” That matter is addressed in these amended contentions. On March 14, 2018, IPB’s counsel sent Mr. Pan an email stating that, other than the identification of products, “if OmniVision has other concerns regarding IPB’s infringement contentions, it should identify those concerns, with specificity, before Dr. Theuwissen’s review of materials next week.” OmniVision has, thus far, failed to provide any detail regarding any remaining objections it may have. Further, to date, OmniVision has refused to provide a substantive response to IPB’s Interrogatory No. 1, which requests information regarding members of each of the product families listed below. For clarity, IPB accuses each member of *each product family listed herein*. IPB further accuses any and all stacked die (i.e. PureCel-S and PureCel Plus-S) products identified as accused products in the case currently pending between the parties in the Northern District of California. IPB intends to amend its contentions and/or its list of accused products once OmniVision provides a substantive response to Interrogatory No. 1.

IPB’s First Amended Infringement Contentions, Case No. 1:16-cv-00290-JFB-SRF

Accordingly, IPB is not currently amending Exhibits 1 through 25 of its infringement contentions, served on January 22, 2018 (“Initial Contentions”) and those charts are incorporated by reference herein. With its Initial Contentions, IPB provided, as Exhibits 1 through 25, at least one chart demonstrating infringement by at least one product per product family accused of infringing each asserted patent. The product families and claims listed and asserted below replaced those provided by IPB in its initial identification of asserted claims for each product family, served on November 3, 2017. For clarity, IPB accuses all members of each of the product families listed below as infringing the patents and claims listed below. Exhibits 1 through 25 are summarized below.

Patent Number	Accused Product Families/Exhibit(s)	Claims Infringed
6,538,324	OmniBSI-2: Exhibit 1 (OV4689*)	1, 5, 9
6,538,324	PureCel: Exhibit 2 (OV8858*)	1, 2, 3, 5, 6, 7, 9
6,709,950	OmniBSI-2: Exhibit 3 (OV4689*)	17-19, 21
6,709,950	PureCel: Exhibit 4 (OV8858*)	12, 13, 15, 17-19, 21
6,794,677	OmniBSI: Exhibit 5 (OV5650*) OmniBSI-2: Exhibit 6 (OV8850*) PureCel: Exhibit 7 (OV8858*)	1, 2, 4, 5
8,084,796	PureCel: Exhibit 8 (OV8858*) PureCel Plus-S: Exhibit 9 (OV16860*), Exhibit 10 (OV16880) PureCel-S: Exhibit 11 (OV23850*)	1-4
8,106,431	OmniBSI: Exhibit 12 (OV5650*) OmniBSI-2: Exhibit 13 (OV8850*)	5
8,106,431	PureCel: Exhibit 14 (OV8858*) PureCel-S: Exhibit 15 (OV16860*) PureCel Plus-S: Exhibit 16 (OV16880) Exhibit 17 (OV23850*)	1, 3, 4, 9, 11, 12
8,378,401	OmniBSI-2: Exhibit 18 (OV8850*)	1, 3, 8, 29
8,378,401	PureCel: Exhibit 19 (OV8858*) PureCel Plus-S: Exhibit 20 (OV16860*), Exhibit 21 (OV16880) PureCel-S: Exhibit 22 (OV23850*)	1-5, 8, 9, 11-13, 29
RE41,867	OmniBSI: Exhibit 23 (OV5650*) OmniBSI-2: Exhibit 24 (OV8850*)	11, 13

* This product was identified as representative by OmniVision. IPB expressly reserves the right to propose other products as representative.

IPB's First Amended Initial Contentions, Case No. 1:16-cv-00290-IPB-SPE

Patent Number	Accused Product Families/Exhibit(s)	Claims Infringed
	PureCel: Exhibit 25 (OV8858*)	

For each of the product families listed above, IPB specifically identifies the following family members as infringing the claims listed above. IPB notes that these members have been updated since IPB's Initial Contentions. IPB further notes that, to date, OmniVision has refused to provide a substantive response requesting information on additional products in response to IPB's Interrogatory No. 1. IPB expects that discovery will show that there are additional members of the accused product families, and IPB intends to accuse those products. IPB further incorporates by reference and specifically accuses all products accused in the Northern District of California case currently pending between the parties. The following identification of specific products is made based on publicly available information.

Product Family	Family Members
OmniBSI	OV2665, OV2720, , OV2722, OV3660, , OV5633, OV5640, OV5642, OV5645, OV5647, OV5648, OV5650, OV5653, OV5656, OV5658, OV5695, OV6946, OV6948, OV7695, OV7699, OV7727, , OV8810, OV8812, OV8820, OV8825, OV9674, OV9724, OV9726, OV9728, OV9740, OV10640, OV10642, OV10650, OV10810, OV12825, OV14810, OV14825, , OX02A10, OX2A10, OX01A10, OX1A10
OMNI BSI-2	OV2718, OV2724, OV2770, OV2775, OV2775-Ards, , OV4682, OV4682 RGB IR, OV4685, OV4688, OV4689, , OV5680, OV5690, OV5693, OV8830, OV8835, OV8850, OV8865, OV9716, OV9760, OV9762, OV9770, OV10823, OV12830, OV16820, OV16825
PureCel	OS02A1Q, OS05A10, OS05A20, OS08A10, OV13853, OV2281, OV2732, OV2740, OV5670, OV5675, OV8856, OV8858, OV9734
PureCel-S	OV13860, OV16850, OV21840, OV23850
PureCel Plus-S	OV12890, OV12895, OV13870, OV13A10, OV13A1Q, OV16860, OV16880, OV16885, OV16885-4C, OV16B10, OV20880, OV20880-4C

Dated: March 23, 2018

Respectfully submitted,

/s/ Ari B. Rafilson

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