

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

GODO KAISHA IP BRIDGE 1,	)	
	)	
Plaintiff,	)	
	)	
v.	)	C.A. No. 16-290 (MN)
	)	
OMNIVISION TECHNOLOGIES, INC.	)	
	)	
Defendant.	)	

**DECLARATION OF CHIJOKE E. OFFOR**

I, Chijioke E. Offor, make this declaration and certify as follows:

1. My name is Chijioke E. Offor. I am more than twenty-one years old, of sound mind, and fully capable of making this declaration. I am a graduate of the University of Michigan, College of Engineering at Ann Arbor, Michigan and the University of Wisconsin Law School at Madison, Wisconsin, and I received my law license from the State Bar of Texas in November 2008. I am a partner at the law firm of Shore Chan DePumpo LLP in Dallas, Texas, and I am one of the attorneys representing plaintiff Godo Kaisha IP Bridge 1 in the action styled *Godo Kaisha IP Bridge 1 v. OmniVision Technologies, LLC*, No. 1:16-cv-00290 (MN), in the United States District Court for the District of Delaware. I have personal knowledge of the facts set forth in this declaration and am competent to testify thereto.

2. A true and correct copy of each of the documents identified in the table below is attached hereto (in Exhibits 1-8).

Exhibit 1	A summary, prepared by IP Bridge’s counsel, of OmniVision’s responses to IP Bridge Interrogatory Nos. 1 and 13 and RFP Nos. 44, 48-52, 74, 76, and 78, excluding OmniVision’s objections and boilerplate reservations of rights.
Exhibit 2	A summary, prepared by IP Bridge’s counsel, of OmniVision’s responses to IP Bridge Interrogatory Nos. 11-12 and RFP Nos. 53-73, excluding OmniVision’s objections and boilerplate reservations of rights.

Exhibit 3	A summary, prepared by IP Bridge's counsel, of OmniVision's responses to IP Bridge RFP Nos. 45-47, excluding OmniVision's objections and boilerplate reservations of rights.
Exhibit 4	A summary, prepared by IP Bridge's counsel, of OmniVision's responses to IP Bridge RFP Nos. 13-40, excluding OmniVision's objections and boilerplate reservations of rights.
Exhibit 5	Mori et al., A 1/4in 2M pixel CMOS image sensor with 1.75 transistor/pixel, 2004 IEEE Int'l Solid-State Circuits Conf., San Francisco, CA, 2004, pp. 110-111 Vol. 1 (Conf. Date: 15-19 Feb. 2004)
Exhibit 6	EXCERPTS from H. Rhodes et. al., CMOS imager technology shrinks and image performance, 2004 IEEE Workshop on Microelec. and Electron Devices, Boise, ID, USA, 2004, pp. 7-18 (Conf. Date: 16 April 2004)
Exhibit 7	EXCERPTS from "CMOS Image Sensor Pixel Design and Optimization," a keynote presentation by OmniVision's Chief Technology Officer Boyd Fowler, dated February 1, 2017, available at <a href="http://www.image-sensors.org/2017.php">http://www.image-sensors.org/2017.php</a> (last visited Nov. 28, 2018 at 2:56 p.m. CST)
Exhibit 8	EXCERPTS from OmniVision Technologies, Inc., H. Rhodes, D. Tai, Y. Qian, D. Mao, V. Venezia et al., "The Mass Production of BSI CMOS Image sensors," available at <a href="http://imagesensors.org/2009-papers/">http://imagesensors.org/2009-papers/</a> (last visited Nov. 28, 2018 at 3:02 p.m. CST)

I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 the foregoing is true and correct to the best of my knowledge. Executed on November 28, 2018 in Dallas, Texas.




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Chijioke E. Offor

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

GODO KAISHA IP BRIDGE 1,	)	
	)	
Plaintiff,	)	
	)	
v.	)	C.A. No. 16-290 (MN)
	)	
OMNIVISION TECHNOLOGIES, INC.	)	
	)	
Defendant.	)	

**IP BRIDGE’S SUMMARY OF OMNIVISION’S RESPONSES TO  
ROG NOS. 1 AND 13 AND RPF NOS. 44, 48-52, 74, 76, AND 78**

IP Bridge Discovery Requests	OmniVision Response <sup>1</sup>
<p><b><u>INTERROGATORY NO. 1:</u></b> Provide a spreadsheet or listing showing every OmniVision Product made or sold by you or at your direction since 2010, and for each product identify: (1) OmniVision’s position as to whether each product is sold in the United States, (2) OmniVision’s categorization of said product (i.e. OmniBSI, OmniBSI-2, PureCel, PureCel-S, and PureCel Plus-S), (3) all internal part numbers used for said product, and (4) all third-party devices of which OmniVision is aware that include said product.</p>	<p><b><u>3/5/2018 OmniVision Response:</u></b> OmniVision is willing to meet and confer regarding the scope of this request.</p> <p><b><u>10/25/2018 OmniVision Response:</u></b> Pursuant to Fed. R. Civ. P. 33(d), OmniVision identifies the following documents in which information responsive to this interrogatory may be ascertained: IPB1-OMNI 00033164.</p>
<p><b><u>INTERROGATORY NO. 13:</u></b> Identify each individual unit of each OMNIVISION PART manufactured or supplied with OmniVision’s authorization since April 22, 2008 by stating for each such unit: (a) the unique identifier(s) for the unit; (b) the part identifier; (c) the mask identifier; (d) the date and country of manufacture; (e) the purchase order number; (f) the name and address of the entity that issued the purchase order; (g) the name and address of each entity identified in or on the purchase order; (h) the internal order number; (i) the internal order date; (j) the unit price; (k) the unit cost; (l) the actual shipment date; (m) the shipment tracking number; (n) the name and address of the entity to which the unit has been shipped; (o) the name and address of each entity to which notice of shipment was given; (p) the rebate number; (q) the name and address of each known END CUSTOMER of such unit; and (r) any internal identifier for each such END CUSTOMER.</p>	<p><b><u>10/26/2018 OmniVision Response:</u></b> Pursuant to Fed. R. Civ. P. 33(d), OmniVision identifies the following document from which information responsive to this interrogatory may be ascertained: IPB1-OMNI 00033164.</p> <div data-bbox="1089 1570 1406 1751" style="text-align: right; border: 2px solid black; padding: 5px; margin-top: 20px;"> <p style="text-align: center; font-weight: bold;">PLAINTIFF’S EXHIBIT</p> <p style="text-align: center; font-size: 2em; font-weight: bold;">1</p> </div>

<sup>1</sup> OmniVision’s purported objections and boilerplate reservations of rights are not reproduced.

IP Bridge Discovery Requests	OmniVision Response <sup>1</sup>
<p><b><u>RFP NO. 44:</u></b> Documents sufficient to show the sales, revenue, cost, and profits for each Accused Product from April 22, 2010 to present.</p>	<p><b><u>10/19/2018 OmniVision Response:</u></b> OmniVision has already produced documents sufficient to show the U.S. sales, revenue, cost, and profits for each Accused Product from April 2010 to present in its custody, possession, and control. OmniVision will not be producing additional documents in response to this Request.</p>
<p><b><u>RFP NO. 48:</u></b> For the TIME FRAME, all agreements concerning the actual or contemplated purchase of an OMNIVISION PART.</p>	<p><b><u>10/22/2018 OmniVision Response:</u></b> OmniVision has already produced agreements relating to U.S. sales of the accused products in its custody, possession, and control. OmniVision will not be producing additional documents in response to this Request.</p>
<p><b><u>RFP NO. 49:</u></b> For the TIME FRAME, all agreements concerning the actual or contemplated price of an OMNIVISION PART.</p>	<p><b><u>10/22/2018 OmniVision Response:</u></b> OmniVision will not be producing any documents in response to this Request.</p>
<p><b><u>RFP NO. 50:</u></b> For the TIME FRAME, all agreements concerning the actual or contemplated supply of an OMNIVISION PART.</p>	<p><b><u>10/22/2018 OmniVision Response:</u></b> OmniVision has already produced agreements relating to U.S. sales of the accused products in its custody, possession, and control. OmniVision will not be producing additional documents in response to this Request.</p>
<p><b><u>RFP NO. 51:</u></b> For the TIME FRAME, all agreements concerning an actual or contemplated rebate related to an OMNIVISION PART.</p>	<p><b><u>10/22/2018 OmniVision Response:</u></b> OmniVision has already produced agreements relating to U.S. sales of the accused products in its custody, possession, and control. OmniVision will not be producing additional documents in response to this Request.</p>
<p><b><u>RFP NO. 52:</u></b> For the TIME FRAME, all agreements concerning the actual or contemplated manufacture of an OMNIVISION PART.</p>	<p><b><u>10/22/2018 OmniVision Response:</u></b> OmniVision has already produced agreements relating to U.S. sales of the accused products in its custody, possession, and control. OmniVision will not be producing additional documents in response to this Request.</p>
<p><b><u>RFP NO. 74:</u></b> Documents sufficient to show the total number of units of each OMNIVISION PART that have been manufactured since April 22, 2010.</p>	<p><b><u>10/22/2018 OmniVision Response:</u></b> OmniVision has already produced documents sufficient to show the total number of units of each OMNIVISION PART that have been manufactured and relate to U.S. sales since April 22, 2010. OmniVision will not be producing additional documents in response to this Request.</p>

IP Bridge Discovery Requests	OmniVision Response <sup>1</sup>
<p><b><u>RFP NO. 76:</u></b> Documents sufficient to show the total number of units of each OMNIVISION PART that have been supplied to a third party since April 22, 2010.</p>	<p><b><u>10/22/2018 OmniVision Response:</u></b> OmniVision has already produced documents sufficient to show the total number of units of each OMNIVISION PART that have been supplied to a third party and relate to U.S. sales since April 22, 2010. OmniVision will not be producing additional documents in response to this Request.</p>
<p><b><u>RFP NO. 78:</u></b> Documents sufficient to show the revenue, cost, and profit for each unit of each OMNIVISION PART that has been supplied to a third party since April 22, 2010.</p>	<p><b><u>10/22/2018 OmniVision Response:</u></b> OmniVision has already produced documents sufficient to show the revenue, cost, and profit for each unit of each OMNIVISION PART that has been supplied to a third party in the U.S. since April 22, 2010. OmniVision will not be producing additional documents in response to this Request.</p>

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