

**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-MN

**DECLARATION OF DIYANG LIU IN SUPPORT OF OMNIVISION'S
DISCOVERY LETTER IN ADVANCE OF THE
DECEMBER 3, 2018 TELEPHONIC HEARING**

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*Attorneys for Defendant OmniVision
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Dated: November 28, 2018
6013804 / 43303

I, Diyang Liu, declare as follows:

1. I am an attorney at Wilson Sonsini Goodrich & Rosati, counsel for Defendant OmniVision Technologies, Inc. (“OmniVision”) in the above-referenced action. I submit this declaration in support of OmniVision’s Letter Brief in Advance of the December 3, 2018 Telephonic Hearing. The matters set forth herein are based upon my personal knowledge, and, if called as a witness, I could and would competently testify thereto.

2. Attached as **Exhibit A** is a true and correct copy of Exhibit 5 to Plaintiff Godo Kaisha IP Bridge 1’s (“Godo”) Amended Infringement Contentions for United States Patent 6,794,677, OV5650 (OmniBSI), served on November 16, 2018.

3. Attached as **Exhibit B** is a true and correct copy of Godo’s Third Supplemental Objections and Responses to OmniVision’s First Set of Interrogatories (Nos. 1-16), served November 16, 2018.

4. Attached as **Exhibit C** is a true and correct copy of excerpts of the transcript of the November 12, 2018 deposition of Huawei Device USA, including pages 1–5 and 105.

5. Attached as **Exhibit D** is a true and correct copy of Godo’s Objections and Responses to OmniVision’s First Set of Interrogatories (Nos. 1-16), served February 26, 2018. Here, on pages 38 and 39, Godo initially identified twelve Japanese-language documents with Bates ranges 290-IPB-OVT004967-004968, 290-IPB-OVT005413-005414, 290-IPB-OVT007874-007904, 290-IPB-OVT007919-008068.

6. Attached as **Exhibit E** is a true and correct copy of Godo’s Second Amended/Supplemental Objections and Responses to OmniVision’s First Set of Interrogatories (Nos. 1-16), dated May 4, 2018. Here, at page 40, Godo has amended its previous responses to Interrogatory No. 15, including by removing the citation to twelve previously-relied-upon

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documents and adding a citation to a different document, 290-IPB-OVT012949-012995. Godo further states that ‘IP Bridge does not maintain records related to the Asserted Patents by “apparatus, product, device, process, method, act, or other instrumentality that practices at least one asserted claim of any of the Asserted Patents” or “gross revenue...on a quarterly basis.’”

7. Attached as **Exhibit R** is a true and correct copy of Exhibit 5 to Godo’s Initial Infringement Contentions for United States Patent 6,794,677, OV5650 (OmniBSI), served on January 22, 2018.

8. Attached as **Exhibit S** is a true and correct copy of a Friday, November 2, 2018 email from Godo’s Counsel (Chijioke Offor) to OmniVision’s Counsel, including me by virtue of my inclusion in the “WSGR – OVT/IP Bridge” email list. The email is the first notice from Godo of a Huawei deposition, and the first notice that it was scheduled for the following Tuesday, November 6, 2018.

9. Attached as **Exhibit T** is a true and correct copy of email correspondence, including a November 5, 2018 email between Godo’s Counsel (Chijioke Offor) and OmniVision’s Counsel (Lisa Zang) that was forwarded to me by Ms. Zang by virtue of my inclusion in the “WSGR – OVT/IP Bridge” email list. The email relates to the rescheduling of the Huawei deposition.

10. Attached as **Exhibit U** is a true and correct copy of an email chain between OmniVision’s Counsel (including Lisa Zang) and Godo’s Counsel (including Sam Joyner) that I received by virtue of my inclusion in the “WSGR – OVT/IP Bridge” email list. The emails related to OmniVision’s objection to the Huawei deposition, dated between November 6-8, 2018.

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

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Executed at Austin, Texas on November 28, 2018.

/s/ Diyang Liu

Diyang Liu

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