

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

GODO KAISHA IP BRIDGE 1,

Plaintiff,

v.

**OMNIVISION TECHNOLOGIES,
INC.**

Defendant.

No. 1:16-cv-00290 (MN)

IP BRIDGE'S NOTICE OF RULE 30(B)(6) DEPOSITION OF OMNIVISION

PLEASE TAKE NOTICE that pursuant to Federal Rule of Civil Procedure 30(b)(6), Godo Kaisha IP Bridge 1 ("IP Bridge"), will take the deposition of OmniVision Technologies, Inc. ("OmniVision"), through one or more of its officers, directors, managing agents, or such other authorized persons who consent to testify on OmniVision's behalf. The deposition will take place on Tuesday, December 18, 2018, beginning at 9:00 a.m. local time, at Wilson Sonsini Goodrich & Rosati, P.C., 601 S. California Ave., Palo Alto, California 94304, or another mutually agreed upon time and location, and will continue until completed.

The deposition will be taken for purposes of discovery needed to perpetuate the testimony of the witness(es) for use at trial and for all other purposes permitted under the Federal Rules of Civil Procedure. The deposition will cover the non-privileged, relevant topics described in the attached "Schedule A" to the full extent such topics are known or reasonably available to OmniVision. The deposition will be taken before an officer authorized by the laws of the United States to administer oaths and will be transcribed by stenographic means and recorded by audiovisual means.

IP BRIDGE'S NOTICE OF RULE 30(B)(6)
DEPOSITION OF OMNIVISION

1

CASE NO. 1:16-cv-00290

Respectfully Submitted,

** Admitted *pro hac vice*

/s/ Stamatios Stamoulis

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on December 5, 2018, the attached document was served, via electronic transmission, upon the following attorneys of record:

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/s/ Stamatios Stamoulis

TOPICS 1-4

1. The name of the pixel architecture, the pixel size, the type of photodetectors (e.g., photogate, photodiode, pinned photodiode, partially pinned photodiode), and the effective number of transistors per pixel employed in each image sensor listed by model number in **Exhibit 4**. The witness should be prepared to confirm the accuracy of the information in the first five columns of **Exhibit 4**, to make any necessary corrections, and to provide any missing information.
2. The differences in the pixel array design of the OmniPixel, OmniPixel2, OmniPixel3, OmniBSI, OmniBSI+, OmniBSI2, PureCel, PureCel-S, and PureCel Plus-S architectures in terms of the type of photodetectors (e.g., photogate, photodiode, pinned photodiode, partially pinned photodiode) and effective number of transistors per pixel employed.
3. From April 22, 2010 to present, OmniVision's importation of image sensors built on an OmniPixel, OmniPixel2, OmniPixel3, OmniBSI, OmniBSI+, OmniBSI2, PureCel, PureCel-S, or PureCel Plus-S architecture. This topic includes the number of units imported, how they were disposed after importation, and any revenues, costs, and profits recorded for such sensors.
4. From April 22, 2010 to November 14, 2023, the actual and projected global sales and profits for image sensors built on an OmniPixel, OmniPixel2, OmniPixel3, OmniBSI, OmniBSI+, OmniBSI2, PureCel, PureCel-S, or PureCel Plus-S architecture. This topic includes units, revenues, costs, and how OmniVision determines a sale is or is not a domestic sale. The witness should also be prepared to provide the approximate date on which OmniVision announced each sensor model identified in **Exhibit 4** and to state OmniVision's position as to whether each such model was sold after April 22, 2010.

TOPICS 5-6

5. OmniVision's domestic and foreign sales cycles.
6. OmniVision's business relationship with each company listed by its trade name in **Exhibit 1**. The witness should be prepared to address (a) whether each company is a buyer of OmniVision image sensors; (b) whether each company is a fabricator of parts that include an OmniVision image sensor; (c) whether each company is an OEM of any application that includes an OmniVision image sensor; (d) the parts or applications subject of subsections (b) and (c); (e) the nature and location of any sales, technical, or warranty support provided by or for OmniVision to each company during the past five years; and (f) the terms of any agreements involving OmniVision and each company.

TOPICS 7-11

7. OmniVision's efforts between February 1, 2003 and April 14, 2006 to design and develop a CMOS image sensor with a pixel array having fewer than three transistors per pixel (effective) and/or a pixel size smaller than 3 μ m. The witness should be prepared to address (a) the sensor model number and architecture of OmniVision's first sensor with sub-3 μ m pixels; (b) the sensor model number and architecture of OmniVision's first sensor with fewer than three transistors per pixel (effective); (c) the names of the core technical personnel involved in designing and developing the following during the above period: OmniPixel architecture, OV2630, OmniPixel2 architecture, OV2640; (d) how each of the following was involved: Howard Rhodes, Sohei Manabe, Keiji Mabuchi, Xinping He, Hongli Yang, Duli Mao, T.J. Dai, Vincent Venezia, Rui Wang, Dyson Tai, Geoffrey Wang; and (e) whether OmniVision filed and/or prosecuted any patent application relating to transistor sharing between pixels in CMOS image sensors and if so, the identity of such patent and applications.
8. The design, performance, and commercial success of the OmniPixel2 architecture announced in or about September 2005, including (a) how OmniVision "significantly improved performance," "improved-fill factor," "increase[d] the sensor's ability to capture light," "improved quantum efficiency," "improve[d] dynamic range," and reduced the pixel size to "less than half the size of the OmniPixel architecture introduced in 2004" (*see* 290-IPB-OVT035404); (b) whether the OmniPixel2 architecture or any sensor built thereon has received any special recognition; (c) whether OmniVision continues to sell the OV2640 or any other sensor built on the OmniPixel2 architecture; (d) whether OmniVision believes or has asserted that a third party has copied its designs; (e) whether OmniVision has licensed any patents or technology related to the improvements introduced by the OmniPixel2 architecture; and (f) whether later announced OmniVision architectures take advantage of the improvements of the OmniPixel2 architecture.
9. From November 2005 to April 21, 2010, the actual and projected global sales and profits for image sensors built on an OmniPixel, OmniPixel2, OmniPixel3, OmniBSI, OmniBSI+, OmniBSI2, PureCel, PureCel-S, or PureCel Plus-S architecture. This topic includes units, revenues, and costs.
10. OmniVision's position as to whether any of the following architectures is patented: OmniPixel, OmniPixel2, OmniPixel3, OmniBSI, OmniBSI+, OmniBSI2, PureCel, PureCel-S, PureCel Plus-S; and the identity of each patent and the specific claims practiced.
11. OmniVision's position as to the benefits, advantages, and importance of, and portion of the realizable profit that should be credited to, employing 4-way and 2-way shared pixel (transistor sharing) architectures in CMOS image sensor arrays, as distinguished from non-patented elements, the manufacturing process, business risks, or significant features or improvements added by or for OmniVision.

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