

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

GODO KAISHA IP BRIDGE 1,	§	
	§	
Plaintiff,	§	
	§	CIVIL ACTION NO. 1:16-cv-00290-SLR
v.	§	
	§	JURY TRIAL DEMANDED
OMNIVISION TECHNOLOGIES, INC.,	§	
	§	
Defendant.	§	

**PLAINTIFF’S RESPONSE TO DEFENDANT OMNIVISION
TECHNOLOGIES, INC.’S STATEMENT PURSUANT TO FED. R. CIV. P. 7.1**

The disclosure statement filed by Defendant OmniVision Technologies, Inc. (“OmniVision”) does not comply with Federal Rule of Civil Procedure 7.1 because it fails to “identif[y] **any** parent corporation ... owning 10% or more of its stock” (emphasis added).

Defendant OmniVision’s Rule 7.1. disclosure identifies only “that it is a wholly-owned subsidiary of Seagull International Limited.” D.I. 9.

Defendant OmniVision does not disclose ownership by Hua Capital Management Co., Ltd. (“Hua Capital”), CITIC Capital Holdings Limited (“CITIC”), and Goldstone Investment Co., Ltd. (“Goldstone”). In a press release, Defendant OmniVision stated that Hua Capital, CITIC, and Goldstone had completed their acquisition of all publicly traded OmniVision stock as of January 28, 2016. *See Exhibit A.* Defendant OmniVision’s admission is corroborated by similar press releases by Hua Capital and CITIC. *See Exhibits B and C.*

Moreover, Defendant OmniVision does not disclose ownership by Shanghai Pudong Science & Technology Investment Co., Ltd. (“Shanghai Pudong”), a Chinese government-owned enterprise that exercises its investment in OmniVision through Hua Capital. *See Exhibits D and E.*

Thus OmniVision's Rule 7.1 disclosure should have identified Hua Capital, CITIC, Goldstone, and Shanghai Pudong as corporate parents and should have revealed Seagull International Limited as merely the shell holding company through which the corporate parents own OmniVision.

Dated: May 26, 2016

STAMOULIS & WEINBLATT LLC

/s/ Stamatios Stamoulis

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Attorneys for Plaintiff Godo Kaisha IP Bridge I

CERTIFICATE OF SERVICE

I hereby certify that on May 26, 2016, I electronically filed the foregoing document with the Clerk of Court using the CM/ECF system which will send notification of such filing via electronic mail to all counsel of record.

/s/ Stamatios Stamoulis

Stamatios Stamoulis #4606