
EXHIBIT 1

Will Ellerman

From: Villarreal, Jose <jvillarreal@wsgr.com>
Sent: Friday, January 19, 2018 2:07 PM
To: Will Ellerman; Ari Rafilson
Cc: Bindu Palapura; Erik Carlson; Stamatios Stamoulis; Henry Pan
Subject: RE: IP Bridge v. OmniVision (D. Del).

Will,
4 pm eastern works for us. Please send us a dial-in.

As we continue to seek a path forward, we respectfully restate that it is premature to involve the court at this time. Instead, IP-Bridge could serve its amended contentions after its expert has performed the GDS inspection and reviewed other documents. At that time OmniVision will have the amended contentions in hand, and will be able to make a determination as to whether it opposes the amendment or not. OmniVision will not be unreasonable in its determination. If the parties disagree, that would be the time to seek judicial assistance. Of course, the other options we propose in this email string remain on the table.

Thank you
Jose

From: Will Ellerman [mailto:wellerman@ShoreChan.com]
Sent: Friday, January 19, 2018 1:53 PM
To: Villarreal, Jose; Ari Rafilson
Cc: Bindu Palapura; Carlson, Erik; Stamatios Stamoulis; Pan, Henry
Subject: RE: IP Bridge v. OmniVision (D. Del).

How about 4:00? Or perhaps a little after, because I know Stam has a conflict until 4:00.

From: Villarreal, Jose [mailto:jvillarreal@wsgr.com]
Sent: Friday, January 19, 2018 1:15 PM
To: Will Ellerman <wellerman@ShoreChan.com>; Ari Rafilson <arafilson@ShoreChan.com>
Cc: Bindu Palapura <bpalapura@potteranderson.com>; Erik Carlson <ecarlson@wsgr.com>; Stamatios Stamoulis <stamoulis@swdelaw.com>; Henry Pan <hpan@wsgr.com>
Subject: RE: IP Bridge v. OmniVision (D. Del).

Will
Our Delaware counsel is available to join us to further meet and confer at 3:30 Eastern. Do this work for IP-Bridge?

From: Will Ellerman [mailto:wellerman@ShoreChan.com]
Sent: Friday, January 19, 2018 1:02 PM
To: Villarreal, Jose; Ari Rafilson
Cc: Bindu Palapura; Carlson, Erik; Stamatios Stamoulis; Pan, Henry
Subject: RE: IP Bridge v. OmniVision (D. Del).

Jose,
Our request was simply for clarification. We will serve our initial contentions Monday as described. They will need to be amended upon expert review of OmniVision's GDS files, which has not happened because of the protective order issue that was just heard two days ago. This is not a difficult issue, and certainly does not warrant an agreement that OmniVision does not have to serve its contentions until April.

Your 5 week option is not a solution. No protective order has been entered, and you insisted on including provisions in that order that we will need to comply with once it is entered.

Please see my earlier email regarding a motion conference.

Will

From: Villarreal, Jose [mailto:jvillarreal@wsgr.com]

Sent: Friday, January 19, 2018 12:28 PM

To: Ari Rafilson <arafilson@ShoreChan.com>

Cc: Bindu Palapura <bpalapura@potteranderson.com>; Erik Carlson <ecarlson@wsgr.com>; Will Ellerman <wellerman@ShoreChan.com>; Stamatios Stamoulis <stamoulis@swdelaw.com>; Henry Pan <hpan@wsgr.com>

Subject: RE: IP Bridge v. OmniVision (D. Del).

Ari

Thanks for your call stating that this proposal is unacceptable as IP-Bridge wants no qualifications on its proposed amendment. I told you this would be difficult to accept as your amendment may turn out to be unreasonable (e.g., adding not accused products to the infringement accusations).

I offered the alternative of a 5 week extension to serve initial infringement contentions and a reciprocal 5 week extension to the invalidity contentions. You declined this option also.

If you have any proposed wording to modify either of Omnivision's proposal's please let me know.

Thanks

Jose

From: Villarreal, Jose

Sent: Friday, January 19, 2018 11:34 AM

To: 'Ari Rafilson'

Cc: Bindu Palapura; Carlson, Erik; Will Ellerman; Stamatios Stamoulis; Pan, Henry

Subject: RE: IP Bridge v. OmniVision (D. Del).

Ari,

Thank you for being available yesterday to discuss your discovery proposal. We believe a motion to the Court regarding unknown amendments to infringement contentions would be premature and speculative. However, we understand your concerns related to the fact that your expert has yet to review the GDS files made available for inspection by Omnivision, and that IP Bridge has not yet agreed to the representative products that Omnivision has proposed. Regardless, we will try to address your concerns and are hopeful we can resolve this issue without involving the Court. It is our view that meaningful contentions exchanged early in the case will benefit both parties. While we can't agree to either of your proposals as drafted, below is a counterproposal.

We propose that IP Bridge serve its infringement contentions on 1/22 and amend its infringement contentions on 3/5 (six weeks after initially serving them) to include information based on your expert's review of OmniVision's core technical document production. Since we have not seen either the initial contentions or the amendment we cannot agree to give IP Bridge the right to amend its infringement contentions in any way it desires to do so. However, we can agree not to move to strike the amended infringement contentions served by the proposed date on the sole basis that the amendment includes additional content from your expert's review of OmniVision's core technical documents discovery. We reserve the right to move to strike if the amendment fundamentally changes IP Bridge's infringement theories or otherwise unfairly prejudices OmniVision. We will not exercise this right unreasonably.

In return, OmniVision seeks a reciprocal six week extension to serve invalidity contentions. The new deadline would be will be due on 4/16.

Please let us know if this is acceptable.

Thank you

Jose

Jose C. Villarreal – Partner IP Litigation | Wilson Sonsini Goodrich & Rosati | 900 South Capital of Texas Highway, Las Cimas IV, Fifth Floor | Austin, TX 78746 | Main: 512.338.5400 | Direct: 512.338.5424 | Facsimile: 512.338.5499 | Mobile: 512.694.7061 | Email jvillarreal@wsgr.com |

From: Ari Rafilson [<mailto:arafilson@ShoreChan.com>]

Sent: Thursday, January 18, 2018 10:02 AM

To: Villarreal, Jose

Cc: Bindu Palapura; Carlson, Erik; Will Ellerman; Carlson, Erik; Stamatios Stamoulis

Subject: RE: IP Bridge v. OmniVision (D. Del).

Jose,

Let's use the following dial-in number for our call at 10 am PST (noon CST):

Dial-in number: 218-936-8679

Access code: 180700#

Best Regards,

Ari

From: Villarreal, Jose [<mailto:jvillarreal@wsgr.com>]

Sent: Thursday, January 18, 2018 9:02 AM

To: Ari Rafilson <arafilson@ShoreChan.com>

Cc: Bindu Palapura <bpalapura@potteranderson.com>; Erik Carlson <ecarlson@wsgr.com>; Will Ellerman <wellerman@ShoreChan.com>; Erik Carlson <ecarlson@wsgr.com>

Subject: RE: IP Bridge v. OmniVision (D. Del).

Ari

We can discuss at 10 am pacific. I may not have an answer to your proposal by that time however although I will try. Please send a dial-in.

Thanks

Jose

From: Ari Rafilson [<mailto:arafilson@ShoreChan.com>]

Sent: Wednesday, January 17, 2018 4:50 PM

To: Villarreal, Jose

Cc: Bindu Palapura; Carlson, Erik; Will Ellerman; Carlson, Erik

Subject: RE: IP Bridge v. OmniVision (D. Del).

Yes. Let's talk tomorrow at 10. I'm assuming that you are proposing 10 am PST which is noon our time.

As a preview, we noted in our briefing on the protective order issue that our preliminary infringement contentions are due on Monday. Because we have not had the opportunity to have an expert review OmniVision's GDS files, we are unable at this time to agree that OmniVision's proposed "representative" products are truly representative and further

will not be able to provide a claim chart for each and every representative product identified by OmniVision for each asserted patent. What we can do by Monday's deadline is provide at least one chart demonstrating infringement by at least one accused product per product family (i.e. OmniBSI, Omni BSI-2, PureCel, ...). Often, but not always, these charts will be for products identified by OmniVision as representative. If we had had the ability to have our expert review OmniVision's GDS files we could have provided more charts and provided more detail in the charts we are able to provide.

According to the scheduling order, IPB's infringement contentions are "initial." This implies that IPB is free to amend its contentions. Nevertheless, IPB seeks OmniVision's explicit agreement to one of the following options:

1. IPB may freely amend its contentions within 2 months after its expert has reviewed OmniVision's GDS files. In exchange IPB would agree that OmniVision can freely amend its invalidity contentions within 2 months after receiving any such amendment; or
2. The parties could propose a change to the scheduling order for infringement and invalidity contentions that would build in time for the above review to occur.

We prefer option 1 because it has less impact on the schedule and leaves claim construction proceedings on the currently-scheduled dates. Nevertheless, we are open to either option. If we cannot come to an agreement, we intend to file a motion on or before Monday, the day our contentions are due.

We look forward to discussing these matters with you.

Ari

From: Villarreal, Jose [<mailto:jvillarreal@wsgr.com>]
Sent: Wednesday, January 17, 2018 4:23 PM
To: Ari Rafilson <arafilson@ShoreChan.com>
Cc: Bindu Palapura <bpalapura@potteranderson.com>; Erik Carlson <ecarlson@wsgr.com>; Will Ellerman <wellerman@ShoreChan.com>; Erik Carlson <ecarlson@wsgr.com>
Subject: RE: IP Bridge v. OmniVision (D. Del).

Ari,

I am tied up this afternoon but can be available tomorrow morning between 10 and 12 noon or 1-2 pm. Can you please generally outline what you want to propose ahead of the call?

Thanks

Jose

Jose C. Villarreal – Partner IP Litigation | Wilson Sonsini Goodrich & Rosati | 900 South Capital of Texas Highway, Las Cimas IV, Fifth Floor | Austin, TX 78746 | Main: 512.338.5400 | Direct: 512.338.5424 | Facsimile: 512.338.5499 | Mobile: 512.694.7061 | Email jvillarreal@wsgr.com |

From: Ari Rafilson [<mailto:arafilson@ShoreChan.com>]
Sent: Wednesday, January 17, 2018 4:09 PM
To: Villarreal, Jose
Cc: Bindu Palapura; Carlson, Erik; Will Ellerman
Subject: IP Bridge v. OmniVision (D. Del).
Importance: High

Jose, We wanted to run something by you following our call with the Court earlier today. Please call me today if possible, or advise regarding your availability tomorrow morning.

Best Regards,

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