

**SMART EXHIBIT 1015**

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2  
3 UNITED STATES DISTRICT COURT  
4 FOR THE SOUTHERN DISTRICT OF TEXAS  
5 HOUSTON DIVISION  
6

7 JAMES B. GOODMAN,

8 Plaintiff,

9 vs.

10 SMART MODULAR TECHNOLOGIES INC.

11 Defendant.  
12

Civil Action No. 4:14-CV-01380 GHM

13 Before U.S. District Court Judge  
14 GRAY H. MILLER

15 JURY TRIAL DEMANDED  
16

17 **DISCLOSURE OF ASSERTED CLAIMS AND**  
18 **PRELIMINARY INFRINGEMENT CONTENTIONS**  
19 **IN ACCORDANCE WITH P.R. 3-2 AND**  
20 **DOCUMENT PRODUCTION UNDER P. R. 3-2**  
21

22 The following is Plaintiff's Disclosure of Asserted Claims and Preliminary Contentions  
23 in accordance with P.R. 3-2:  
24

- 25 (a) Only Claim 1 of the patent-in-suit is being asserted at this time; however, Plaintiff  
26 reserves the right to asserted additional claims.  
27 (b) Claim 1 of the patent-in-suit is infringed by at least the products identified by the  
28 Defendant as DDR2, DDR3, and DDR4.  
(c) A chart showing the relationship between Claim 1 of the patent-in-suit and the  
infringing products identified above in item (b) is on disk A accompanying this  
document.  
(d) Based on the technical information available, the identified products infringe  
under the doctrine of equivalents with respect to having at least two memory  
devices by exhibiting at least two banks of memory.  
(e) No priority to an earlier application or priority date is being asserted.

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1 (f) Item P.R. 3-2 (f) does not apply.

2 The following is the Document Production under P.R. 3-2:

3 (1) There are no documents pursuant to P.R. 3-2 (a)(1).

4 (2) There are no documents pursuant to P.R. 3-2 (a)(2).

5 (3) The file history of the patent-in-suit is provided on the disk A accompanying this  
6 document.

7 (4) Copies of license agreements for the patent-in-suit are provided on the disk A  
8 accompanying this document

9 Respectfully submitted,

10  
11 /s/ David Fink  
12 David Fink  
13 Fink & Johnson  
14 7519 Apache Plume  
15 Houston, TX 77071  
16 Admission No. 299869  
17 Tel. 713 729-4991  
18 Fax: 713 729-4951  
19 Email: [texascowboy6@gmail.com](mailto:texascowboy6@gmail.com)  
20 Attorney in Charge for the Plaintiff

21 Enclosure: Disk A  
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1 **CERTIFICATE OF SERVICE**

2 I hereby certify that a true and correct copy of the foregoing Notice has been sent by  
3 prepaid First Class U.S. Mail on October 22, 2014 to the attorney for the Defendant at the  
4 following address:

5 Anup M. Shah  
6 King & Spalding  
7 100 North Tryon Street, Suite 3900  
8 Charlotte, NC 28202

9 /s/ David Fink  
10 David Fink  
11 Attorney in Charge for the Plaintiff  
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