

WRITER'S DIRECT DIAL NO.
(202) 538-8104

WRITER'S INTERNET ADDRESS
alexlasher@quinnemanuel.com

DOCKET NUMBER 3235 ----- Office of the Secretary Int'l Trade Commission

July 7, 2017

VIA HAND DELIVERY

The Honorable Lisa R. Barton, Secretary
U.S. International Trade Commission
500 E Street, SW – Room 112
Washington, DC 20436

Re: *Certain Mobile Electronic Devices And Radio Frequency And Processing Components Thereof*

Dear Secretary Barton:

Enclosed for filing, please find documents in support of a request by Qualcomm Incorporated (“Complainant”) that the U.S. International Trade Commission institute an investigation pursuant to Section 337 of the Tariff Act of 1930, as amended, concerning certain mobile electronic devices and radio frequency and processing components thereof. Complainant’s submission includes the following documents:

1. One (1) original and eight (8) paper copies of Complainant’s Verified Complaint, pursuant to Commission Rule 210.8(a)(1)(i).
2. One (1) electronic copy of the public exhibits to the Verified Complaint pursuant to Commission Rules 210.8(a)(1)(i) and 210.12(a)(9), including:
 - a. one (1) electronic certified copy of each of United States Patent Nos. 8,633,936 (“the ’936 patent”), 8,698,558 (“the ’558 patent”), 8,487,658 (“the ’658 patent”), 8,838,949 (“the ’949 patent”), 9,535,490 (“the ’490 patent”), 9,608,675 (“the ’675 patent”), copies of which are respectively included as Exhibits 1, 3, 5, 7, 9, and 11 to the Verified Complaint pursuant to Commission Rule 210.12(a)(9)(i); and

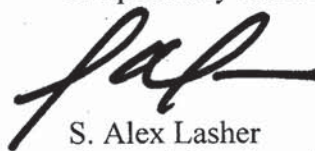
QC 2003, p.1

- b. one (1) electronic copy of the certified assignment records for each of the '936 patent, '558 patent, '658 patent, '949 patent, '490 patent, and '675 patent, copies of which are respectively included as Exhibits 2, 4, 6, 8, 10, and 12 to the Verified Complaint, pursuant to Commission Rule 210.12(a)(9)(ii).
3. One (1) electronic copy of the confidential exhibits to the Verified Complaint, pursuant to Commission Rules 201.6(c) and 210.8(a)(1)(ii).
4. One (1) additional copy of the Verified Complaint and accompanying electronic copies of the public exhibits, for service upon the Proposed Respondent, pursuant to Commission Rules 201.6(c) and 210.8(a)(1)(iii); and one (1) additional copy of electronic copies of the confidential exhibits to the Verified Complaint for service upon the Proposed Respondent's counsel after it has subscribed to the protective order.
5. Four (4) electronic copies each of the certified prosecution history of the '936 patent, '558 patent, '658 patent, '949 patent, '490 patent, and '675 patent, which are respectively identified as Appendices A, C, E, G, I, and K to the Verified Complaint, pursuant to Commission Rule 210.12(c)(1).
6. Four (4) electronic copies each of each patent and applicable pages of each technical reference mentioned in the prosecution history of the '936 patent, '558 patent, '658 patent, '949 patent, '490 patent, and '675 patent, which are respectively identified as Appendices B, D, F, H, J, and L to the Verified Complaint, pursuant to Commission Rule 210.12(c)(2).
7. One physical sample of a representative imported article that is the subject of the complaint (Physical Exhibit P1 to the Verified Complaint).
8. A letter and certification requesting confidential treatment for the information contained in confidential exhibits 14C and 16C-27C to the Verified Complaint, pursuant to Commission Rules 201.6(b) and 210.5(d).
9. A Statement on the Public Interest regarding the remedial orders sought by Complainants in the Verified Complaint, pursuant to Commission Rule 210.8(b).

Please contact me with any questions regarding this filing.

Dated: July 7, 2017

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'S. Alex Lasher', written in a cursive style.

S. Alex Lasher
*Counsel for Complainant Qualcomm
Incorporated*

Enclosures

WRITER'S DIRECT DIAL NO.
(202) 538-8104

WRITER'S INTERNET ADDRESS
alexlasher@quinnemanuel.com

REQUEST FOR CONFIDENTIAL TREATMENT

July 7, 2017

VIA HAND DELIVERY

The Honorable Lisa R. Barton, Secretary
U.S. International Trade Commission
500 E Street, SW – Room 112
Washington, DC 20436

Re: *Certain Mobile Electronic Devices And Radio Frequency And Processing Components Thereof*

Dear Secretary Barton:

Pursuant to Commission Rule 201.6, Complainant Qualcomm Incorporated respectfully requests confidential treatment of certain confidential business information contained in confidential exhibits 14C and 16C-27C to the Verified Complaint.

The information in the exhibits for which Complainant seeks confidential treatment consists of proprietary commercial information, including confidential and proprietary licensing information, technical information related to domestic articles protected by Complainant's asserted patents, technical information related to accused products articles obtained from nonpublic teardowns, and financial data regarding Complainant's domestic investments in plant and equipment and labor and capital related to domestic articles protected by Complainant's asserted patents.

The proprietary information described herein qualifies as confidential business information under Commission Rule 201.6 because substantially-identical information is not available to the public, because the disclosure of this information would cause substantial competitive harm to Complainant, and because the disclosure of this information would likely impede the Commission's efforts and ability to obtain similar information in the future.

QC 2003, p.4

Thank you for your attention. Please contact me with any questions regarding this request for confidential treatment.

Dated: July 7, 2017

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'S. Alex Lasher', with a long horizontal stroke extending to the right.

S. Alex Lasher
*Counsel for Complainant Qualcomm
Incorporated*

Enclosure (Certification)

Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.