UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION

Ocean Semiconductor LLC, Plaintiff v. Silicon Laboratories Inc. ("SILABS"), Defendant.	Civil Action No.: 6:20-cv-1214 JURY TRIAL DEMANDED PATENT CASE

COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff Ocean Semiconductor LLC ("Ocean Semiconductor" or "Plaintiff") files this Complaint against Silicon Laboratories Inc. ("SILABS" or "Defendant"), seeking damages and other relief for patent infringement, and alleges with knowledge to its own acts, and on information and belief as to other matters, as follows:

NATURE OF THE ACTION

1.   This is an action for patent infringement arising under the Patent Laws of the United States, 35 U.S.C. § 1 *et seq*.

THE PARTIES

2.   Plaintiff Ocean Semiconductor is a limited liability company organized and existing under the laws of the State of Delaware, and its registered agent for service of process in Delaware is Rita Carnevale, 717 N. Union Street, Wilmington, DE 19805.

3.   On information and belief, SILABS is a Delaware corporation with a principal place of business at 400 W. Cesar Chavez, Austin, TX 78701. On information and belief, Defendant may be served through its registered agent, The Corporation Trust Company, at 1209 N. Orange St., Wilmington, DE 19801.

4.   On information and belief, Defendant SILABS sells, offers to sell, and/or uses products and services throughout the United States, including in this judicial District, and introduces infringing products and services into the stream of commerce knowing that they would be sold and/or used in this judicial District and elsewhere in the United States.

5.   Plaintiff Ocean Semiconductor is the assignee and owner of the patents at issue in this action: U.S. Patents Nos. 6,660,651, 6,907,305, 6,725,402, 6,968,248, 7,080,330, 6,836,691, and 8,676,538 (collectively, the "Asserted Patents"). Ocean Semiconductor holds all substantial rights, title, and interest in the Asserted Patents, including the exclusive right to sue SILABS for infringement and recover damages, including damages for past infringement.

6.   Plaintiff Ocean Semiconductor seeks monetary damages and prejudgment interest for Defendant's past and ongoing direct and indirect infringement of the Asserted Patents.

7.   Defendant SILABS is a semiconductor company that designs, develops, sells, offers to sell, and imports into the United States semiconductor products in the communications, internet of things, automotive, computer, and consumer electronics industry.

8.   Defendant SILABS, headquartered in Austin, Texas, contracts with third-party semiconductor fabricators or foundries ("SILABS Foundry Partners") that own, operate, or control semiconductor fabrication plants ("fabs") within and/or outside of the United States ("International Facilities") to produce the Accused Products. One such SILABS Foundry Partner is Taiwan Semiconductor Manufacturing Company Ltd. ("TSMC"). TSMC has a contractual

partnership with SILABS to design, develop, or manufacture semiconductor products including integrated circuits for SILABS. *See, e.g.* "Silicon Labs Quality and Operations Overview," at 21, *available at* https://www.silabs.com/documents/public/miscellaneous/Silicon-Labs-Business-Introduction.pdf (last visited Oct. 12, 2020); *see also* ""Process Change Notice #1011021," *available at* https://www.silabs.com/documents/public/pcns/1011021.pdf (last visited Oct. 12, 2020).

9.   On information and belief, Defendant SILABS (directly or through one or more of its Foundry Partners such as TSMC) has a contractual relationship with Applied Materials, Inc. ("Applied Materials") (*see* Applied Materials' job posting for "TSMC F15 E3 project," *available at* http://www.mse.ntu.edu.tw/attachments/article/154/AMT_Summer%20Student%20Program_Job%20Post_2013.pdf (last accessed October 12, 2020) and PDF Solutions Inc. ("PDF Solutions") (*e.g.*, "Taiwan Semiconductor Manufacturing Company adopts PDF Solutions yield improvement technology," *available at* https://www.edn.com/taiwan-semiconductor-manufacturing-company-adopts-pdf-solutions-yield-improvement-technology/ (last accessed Oct. 12, 2020); *see also* "Exensio: Big Data in the Fab," *available at* https://semiwiki.com/eda/4351-exensio-big-data-in-the-fab/ (last accessed Oct. 12, 2020)), and one or more of the SILABS Foundry Partners (e.g., TSMC) employ Applied Materials' semiconductor fabrication or manufacturing equipment, platforms, and/or framework, including Applied Materials' E3 system, including the E3 factory advanced/automation process control ("APC") hardware and/or software (collectively, "E3 system"), PDF Solutions' Exensio hardware and/or software (collectively, "Exensio system"), and/or other in-house or third-party advanced/automation process control system and platform hardware and/or software (e.g., with

similar technical and functional features) to design, develop, and/or manufacture Defendant

SILABS's semiconductor devices, including integrated circuits.

10.   Upon information and belief, TSMC employs Applied Materials' and/or PDF

Solutions' semiconductor fabrication or manufacturing equipment, platforms, and/or framework

(e.g., Applied Materials' E3 system and/or PDF Solutions' Exensio system) at its manufacturing

facilities. Applied Materials has received supplier awards and recognition from TSMC. *See,*

e.g., "TSMC Recognizes Outstanding Suppliers at Supply Chain Management Forum," *available*

at https://pr.tsmc.com/english/news/1873 (last accessed October 12, 2020). On information and

belief, TSMC also employs PDF Solutions' Exensio system at TSMC's manufacturing facilities.

11.   On information and belief, Defendant SILABS (directly or through its SILABS

Foundry Partners such as TSMC) employs Applied Materials' E3 system and/or PDF Solutions'

Exensio system to develop or manufacture one or more systems, products, and/or devices for

importation into the United States for use, sale, and/or offer for sale in this District and

throughout the United States, including, but not limited to, semiconductor products and devices,

such as wireless products (e.g., EFR32XG2X family), internet of things products (e.g.,

EFM8BB10F8G-QFN20, EFM8BB10F2A-QFN20, EFM8BB10F2G-QFN20, EFM8BB10F2I-

QFN20, EFM8BB10F4A-QFN20, EFM8BB10F4G-QFN20, EFM8BB10F4I-QFN20,

EFM8BB10F8A-QFN20, EFM8BB10F8G-QSOP24, EFM8BB10F8G-SOIC16, EFM8BB10F8I-

QFN20, EFM8BB10F8I-QSOP24, EFM8BB10F8I-SOIC16, EFM8BB21F16A-QFN20,

EFM8BB21F16G-QFN20, EFM8BB21F16G-QSOP24, EFM8BB21F16I-QFN20,

EFM8BB21F16I-QSOP24, EFM8BB22F16A-QFN28, EFM8BB22F16G-QFN28,

EFM8BB22F16I-QFN28, EFM8BB31F16A-4QFN24, EFM8BB31F16A-5QFN32,

EFM8BB31F16G-QFN24, EFM8BB31F16G-QFN32, EFM8BB31F16G-QFP32,

EFM8BB31F16G-QSOP24, EFM8BB31F16I-4QFN24, EFM8BB31F16I-5QFN32, EFM8BB31F16I-QFN24, EFM8BB31F16I-QFN32, EFM8BB31F16I-QFP32, EFM8BB31F16I-QSOP24, EFM8BB31F32A-4QFN24, EFM8BB31F32A-5QFN32, EFM8BB31F32G-QFN24, EFM8BB31F32G-QFN32, EFM8BB31F32G-QFP32, EFM8BB31F32G-QSOP24, EFM8BB31F32I-4QFN24, EFM8BB31F32I-5QFN32, EFM8BB31F32I-QFN24, EFM8BB31F32I-QFN32, EFM8BB31F32I-QFP32, EFM8BB31F32I-QSOP24, EFM8BB31F64A-4QFN24, EFM8BB31F64A-5QFN32, EFM8BB31F64G-QFN24, EFM8BB31F64G-QFN32, EFM8BB31F64G-QFP32, EFM8BB31F64G-QSOP24, EFM8BB31F64I-4QFN24, EFM8BB31F64I-5QFN32, EFM8BB31F64I-QFN24, EFM8BB31F64I-QFN32, EFM8BB31F64I-QFP32, EFM8BB31F64I-QSOP24), infrastructure products (e.g., Si5332A-GM1, Si5332A-GM2, Si5332A-GM3, Si5332B-GM1, Si5332B-GM2, Si5332B-GM3, Si5332C-GM1, Si5332C-GM2, Si5332C-GM3, Si5332D-GM1, Si5332D-GM2, Si5332D-GM3, Si5332E-GM1, Si5332E-GM2, Si5332E-GM3, Si5332F-GM1, Si5332F-GM2, Si5332F-GM3, Si5332G-GM1, Si5332G-GM2, Si5332G-GM3, Si5332H-GM1, Si5332H-GM2, Si5332H-GM3, Si5332A-GM1, Si5332A-GM2, Si5332A-GM3, Si5332B-GM1, Si5332B-GM2, Si5332B-GM3, Si5332C-GM1, Si5332C-GM2, Si5332C-GM3, Si5332D-GM1, Si5332D-GM2, Si5332D-GM3, Si5332E-GM1, Si5332E-GM2, Si5332E-GM3, Si5332F-GM1, Si5332F-GM2, Si5332F-GM3, Si5332G-GM1, Si5332G-GM2, Si5332G-GM3, Si5332H-GM1, Si5332H-GM2, Si5332H-GM3), broadcast products (e.g., Si2160, Si2162, Si2164, Si2180, Si2181, Si2182, Si2183), access products (e.g., Si3000, Si3402-GM, Si3404-GM, Si3406-GM, Si34062-GM, Si3462-GM, Si3471A-IM, microcontrollers (e.g., Tiny Gecko series, EFM8 Busy Bee), buffers (e.g., Si5330x), oscillators (e.g., Si54x), clock generators (e.g., Si534x), jitter attenuators (e.g., Si539x), synchronous ethernet (e.g., Si5383/48/88), isolation products (e.g., Si86xx, Si87xx,

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