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

HD SILICON SOLUTIONS LLC,	
Plaintiff,	Civil Action No. 6:20-cv-01092-ADA
v.	**PATENT CASE**
MICROCHIP TECHNOLOGY INC.,	**JURY TRIAL DEMANDED**
Defendant.	

PLAINTIFF HD SILICON SOLUTIONS LLC'S
<u>PRELIMINARY INFRINGEMENT CONTENTIONS AND RELATED DISCLOSURES</u>

Plaintiff HD Silicon Solutions LLC ("HDSS") hereby provides its preliminary infringement contentions and related disclosures. HDSS's disclosures are based on publicly available materials regarding the accused infringing products of defendant Microchip Technology Inc. ("MTI") that describe or discuss aspects of the operation of such products. HDSS has not had access to any discovery of defendant's materials at this point, and certain information is not yet available to HDSS that may be relevant to its infringement claims. HDSS reserves the right to supplement or alter its disclosures herein based on additional information obtained concerning defendant's products.

I.   Preliminary Infringement Contentions

A.   <u>Infringed Claims</u>

The following table identifies the patents-in-suit and summarizes each claim of those patents that is alleged to be infringed by MTI.

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Patent	Infringed Claims
7,260,731	1, 4, 6, 8
7,870,404	1, 3, 5, 6, 11, 14, 15, 16, 18, 19, 21
7,810,002	1, 2, 3, 4, 5, 6, 8, 9, 11, 12, 15, 16, 17, 18, 19
6,748,577	1–38
7,154,299	1–16, 18, 19, 23, 24, 25
7,302,619	1, 2, 3, 6, 10, 11, 12, 13, 14, 17, 21 22, 24, 26, 27, 28, 29, 30, 31
6,774,033	1, 2, 5, 8, 10, 13, 17

HDSS reserves the right to augment and supplement its identification of asserted claims based upon additional information obtained through discovery.

B. Infringing Instrumentalities

Based upon information presently available to it, HDSS asserts infringement by the instrumentalities set forth in the table below.

Patent	Infringing Instrumentalities
7,260,731 7,870,404	MTI microcontroller unit families/products: • PIC32MM0064GPL036 • PIC32MM0256GPM064 • PIC32MX1XX/2XX • PIC24FJ128GC010 • PIC24FJ64GB202 • PIC24FJ128GB202 • PIC24FJ64GB204 • PIC24FJ128GB204 • PIC24FJ512GU410 • PIC24FJ512GU410

Patent	Infringing Instrumentalities
	• PIC24FJ128GL306 • PIC24FJ64GP205/GU205 • PIC24FJ256GA412/GB412 • PIC24FJ128GA204 • PIC24FJ128GA310 • PIC24FJ256GA412/GB412 • PIC24FJ1024GA610/GB610 • PIC24FJ256GA705 • PIC24FV16KM204 • PIC24FV32KA304 • PIC24F16KA102 • PIC18F06/16Q41 • PIC18F27/47/57Q43 • PIC18F26/45/46Q10 • PIC16LF1554/1559 • PIC16LF1566/1567 • PIC16LF1902/3 • PIC16LF1904/6/7 • PIC16(L)F18855/75 • PIC18(L)F67K40 • PIC16(L)F1717/8/9 • Any other microcontrollers described as including XLP Technology
7,810,002	MTI microcontroller unit families/products: • SAM L11, including but not limited to ATSAML11D14A, ATSAML11D15A, ATSAML11D15A, and ATSAML11E15A
6,748,577	MTI field-programmable gate array families/products: • AT40K05 • AT40K10 • AT40K20

Patent	Infringing Instrumentalities
	• AT40K40 • AT40K10AL • AT40K20AL • AT40K40AL
7,154,299	MTI field-programmable gate array families/products: • PolarFire FPGAs, including but not limited to Mid-Range FPGAs, PolarFire SOC FPGAs, and RT PolarFire Radiation-Tolerant FPGAs • SmartFusion2 SoC FPGA • IGLOO2 FPGA
7,302,619	MTI microcontroller unit families/products: • PIC32MZ EF family • PIC32MZ DAK/DAL/DAR/DAS family • PIC32MK (GPG/MCJ) family • PIC32MK (GPK/MCM) family
6,774,033	MTI products containing static RAM produced by foundries, including but not limited to TSMC, UMC, and SMIC, using foundry processes from 90 nm to 10 nm, including but not limited to: • 90 nm • 65 nm • 40 nm • 28 nm • 16 nm • 12 nm • 10 nm Examples of such products include, but are not limited to, the '299 Accused Chips.

More complete information about MTI's products and methods is in the possession of

MTI and is expected to be obtained through discovery. HDSS reserves the right to augment and

supplement its preliminary identification of infringing products based upon additional information obtained through discovery.

C.   Claim Charts for Literal Infringement

HDSS's preliminary infringement charts are provided as attached Exhibits A1–A7. The "Accused Chips" referenced in each chart are the Infringing Instrumentalities identified above for that patent. In each claim chart, the discussion for dependent claims should be read as incorporating by reference the discussion corresponding to the claims on which they depend. In addition, the discussion for each row in the chart should be read within the context of the discussion for the entire claim to which that row pertains. Where the charts incorporate excerpts of a document, the excerpt is exemplary and should be read within the context of the entire document.

HDSS reserves the right to augment and supplement its preliminary claim charts based upon additional information obtained through discovery.

D.   Doctrine of Equivalents

Unless otherwise noted in the claim charts, HDSS alleges that defendants infringe literally all claims identified above. To the extent any differences are alleged to exist between the above-identified claims and MTI's infringing conduct, such differences are insubstantial and MTI's products and processes perform substantially the same function, in substantially the same way, to yield substantially the same result, and therefore MTI infringes under the doctrine of equivalents.

MTI reserves the right to augment and supplement its disclosure concerning the doctrine of equivalents based upon additional information obtained through discovery or based upon the Court's claim construction.

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