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

Ocean Semiconductor LLC,
 	
       Plaintiff
 	
v.
 	
NVIDIA Corporation,
 	
       Defendant.
	Civil Action No.: 6:20-cv-1211
	
	JURY TRIAL DEMANDED
	
	PATENT CASE

CASE READINESS STATUS REPORT

Plaintiff Ocean Semiconductor LLC ("Ocean") and Defendant NVIDIA Corporation ("NVIDIA") hereby provide the following status report in advance of the initial Case Management Conference (CMC).

FILING AND EXTENSIONS

Plaintiff's Complaint (Dkt. 1) was filed on December 31, 2020. There has been one extension for a total of forty-five days.

RESPONSE TO THE COMPLAINT

NVIDIA responded to the Complaint with its Rule 12(b)(6) Motion to Dismiss Claims Under the '538, '305, and '248 Patents Because They Are Not Cognizable Under 35 U.S.C. § 271(g) ("Motion to Dismiss") (Dkt. 13) and Answer to Complaint for Patent Infringement (Dkt. 14) on March 12, 2021.

PENDING MOTIONS

Currently pending before this Court are NVIDIA's Motion to Dismiss (Dkt. 13) and Ocean's Motion for Leave to File Sur-Reply In Opposition to NVIDIA Corporation's Motion to Dismiss for Failure to State a Claim (Dkt. 19).

RELATED CASES IN THIS JUDICIAL DISTRICT

1. *Ocean Semiconductor LLC v Mediatek Inc. and Mediatek USA Inc.*, Civil Action No. 6:20-cv-1210-ADA (W.D. Tex.)

2. *Ocean Semiconductor LLC v. NXP Semiconductors N.V., NXP B.V. and NXP USA, Inc.*, Civil Action No.: 6:20-cv-1212-ADA (W.D. Tex.)

3. *Ocean Semiconductor LLC v. Renesas Electronics Corporation and Renesas Electronics America, Inc.*, Civil Action No.: 6:20-cv-1213-ADA (W.D. Tex.)

4. *Ocean Semiconductor LLC v. Silicon Laboratories Inc.*, Civil Action No.: 6:20-cv-1214-ADA (W.D. Tex.)

5. *Ocean Semiconductor LLC v. STMicroelectronics, Inc.*, Civil Action No.: 6:20-cv-1215-ADA (W.D. Tex.)

6. *Ocean Semiconductor LLC v. Western Digital Technologies, Inc.*, Civil Action No.: 6:20-cv-1216-ADA (W.D. Tex.)

IPR, CBM, AND OTHER PGR FILINGS

Defendant Western Digital Technologies ("WDT") in *Ocean Semiconductor LLC v. Western Digital Technologies* (Civil Action No.: 6:20-cv-1216-ADA) has filed an *inter partes review* petition (IPR2021-00864) on April 29, 2021, challenging the validity of one of eight patents asserted against WDT, U.S. Patent No. 6,660,651. That patent has also been asserted in this action.

NUMBER OF ASSERTED PATENTS AND CLAIMS

In the Complaint, Plaintiff has identified nine patents and a total of nine claims as being infringed by NVIDIA. Plaintiff will set forth all asserted patents and claims in its preliminary infringement contentions.

APPOINTMENT OF TECHNICAL ADVISER

The parties do not intend to request, nor anticipate a need for, a technical adviser at this juncture.

MEET AND CONFER STATUS

Plaintiff and Defendant met and conferred.

The parties have no pre-Markman issues to raise at the case management conference other than those already identified in the pending motions (Dkt. 13 and Dkt. 19).

Dated: May 5, 2021

Respectfully Submitted,

/s/ Alex Chan
Timothy Devlin
tdevlin@devlinlawfirm.com
Henrik D. Parker
hparker@devlinlawfirm.com
Alex Chan
State Bar No. 24108051
achan@devlinlawfirm.com
DEVLIN LAW FIRM LLC
1526 Gilpin Avenue
Wilmington, Delaware 19806
Telephone: (302) 449-9010
Facsimile: (302) 353-4251

Attorneys for Plaintiff,
Ocean Semiconductor LLC

/s/ Andrew D. Holmes
Scott L. Cole
Texas Bar No. 00790481
scottcole@quinnemanuel.com
QUINN EMANUEL URQUHART &
SULLIVAN, LLP
5209 Spanish Oaks Club Blvd
Austin, TX 78738
737 667 6100 – Telephone
737 667 6110 – Facsimile

Sean Pak (*pro hac vice*)
seanpak@quinnemanuel.com
Andrew D. Holmes (*pro hac vice*)
drewholmes@quinnemanuel.com
QUINN EMANUEL URQUHART &
SULLIVAN, LLP
50 California Street, 22nd Floor
San Francisco, California 94111
415.875.6600 – Telephone
415.875.6700 – Facsimile

**ATTORNEYS FOR DEFENDANT
NVIDIA CORPORATION**

<u>CERTIFICATE OF SERVICE</u>

I hereby certify that on May 5, 2021, a true and correct copy of the above and foregoing

document has been served on all counsel of record via the Court's CM/ECF system.

/s/ Alex Chan
Alex Chan