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

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

**PLAINTIFF OCEAN SEMICONDUCTOR LLC'S OPPOSITION
TO DEFENDANT SILICON LABORATORIES INC.'S MOTION
<u>TO DISMISS FOR FAILURE TO STATE A CLAIM</u>**

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TABLE OF CONTENTS

TABLE OF AUTHORITIES

Cases

Rules

Statutes

Other Authorities

I.   INTRODUCTION

Defendant Silicon Laboratories Inc.'s ("Silicon Labs") Motion to Dismiss (Dkt. 14) is a hodgepodge of conclusory assertions about the adequacy of Ocean Semiconductor LLC's ("Ocean") Complaint (Dkt. 1) that both: (a) confuse the pleading standards and Rule 12(b)(6) law while citing to non-precedential and inapplicable case law; and (b) ignore the extensive evidentiary presentation (including citation to Silicon Labs' website, presentations at trade shows, and Silicon Labs' online Discussion Forum and Expert's Corner) in that Complaint. While purporting to apply a "plausibility" standard, Silicon Labs actually argues for a much higher, and legally improper, pleading standard that would require Ocean to know, and lay out in the Complaint, substantially more than is required under the *Iqbal*/*Twombly* Supreme Court standard. This misapplication of legal standards runs throughout Silicon Labs' Motion.

Indeed, despite having specified in the Complaint at least one foundry, identified five manufacturing tools, and described more than 165 accused products manufactured by the foundry using the tools, Silicon Labs wants more—it seeks to require Ocean to identify *every* foundry and *every* tool that might be found to infringe. That is not the law. Ocean need only plead facts sufficient to place Silicon Labs on notice as to what it must defend—and Ocean did.

Similarly, in support of its inducement claims, Ocean has provided evidence and factual allegations—allegations that the Court must accept as true—that would allow an inference that Silicon Labs knew about the manufacturing processes and equipment used to manufacture its own products by virtue of its contractual relationships with its foundries. Already exceeding what is typically required under the *Iqbal*/*Twombly* pleading standard, Ocean's Complaint also offered three specific classes of information that Ocean expects discovery will reveal and that would lend credence to Ocean's inducement allegations. If this information is insufficient to meet the *Iqbal*/*Twombly* pleading standard, it is difficult to imagine what would.

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