# **EXHIBIT** A

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

Ocean Semiconductor LLC, Plaintiff v. MediaTek Inc. and MediaTek USA Inc. ("MediaTek"), Defendants.	Civil Action No.: 6:20-cv-1210-ADA JURY TRIAL DEMANDED PATENT CASE
Ocean Semiconductor LLC, Plaintiff v. NVIDIA Corporation, Defendant.	Civil Action No.: 6:20-cv-01211-ADA JURY TRIAL DEMANDED PATENT CASE
Ocean Semiconductor LLC, Plaintiff v. NXP USA, Inc. Defendants.	Civil Action No.: 6:20-cv-1212-ADA JURY TRIAL DEMANDED PATENT CASE

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### Case 6:20-cv-01214-ADA Document 55-2 Filed 02/16/22 Page 3 of 43

Ocean Semiconductor LLC,

Plaintiff

v.

Renesas Electronics Corporation and Renesas Electronics America, Inc.,

Defendants.

Ocean Semiconductor LLC,

Plaintiff

v.

Silicon Laboratories Inc.,

Defendant.

Ocean Semiconductor LLC,

Plaintiff

v.

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STMicroelectronics, Inc.,

Defendant.

Civil Action No.: 6:20-cv-1213-ADA JURY TRIAL DEMANDED PATENT CASE

Civil Action No.: 6:20-cv-1214-ADA JURY TRIAL DEMANDED PATENT CASE

Civil Action No.: 6:20-cv-1215-ADA

JURY TRIAL DEMANDED

PATENT CASE

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Ocean Semiconductor LLC,

Plaintiff

v.

Western Digital Technologies, Inc.

Defendant.

Civil Action No.: 6:20-cv-1216-ADA JURY TRIAL DEMANDED PATENT CASE

## TO THE APPROPRIATE JUDICIAL AUTHORITY OF TAIWAN:

The United States District Court for the Western District of Texas presents its

compliments to the Appropriate Judicial Authority of Taiwan, and requests judicial assistance to

obtain evidence to be used in a civil proceeding before this Court in the above-captioned matters.

The Court requests the assistance described herein as necessary in the interests of justice.

# I. REQUEST

The Court requests that the Appropriate Judicial Authority of Taiwan compel production

of documents and testimony of a representative or representatives from the following corporate

entity:

United Microelectronics Corporation (UMC) United Tower, 3 Li-Hsin 2nd Rd., Hsinchu Science Park, Hsinchu, Taiwan 30078

United Microelectronics Corporation is represented by:

Robert G. Litts CANDESCENT LAW GROUP 1350 Old Bayshore Hwy, Ste. 520 Burlingame, CA 94010 Telephone: (925) 644-1102 robert.litts@candescentlaw.com

### Case 6:20-cv-01214-ADA Document 55-2 Filed 02/16/22 Page 5 of 43

Specifically, the Court requests that United Microelectronics Corporation ("UMC") produce the documents and things set forth in **Attachment A** to this Request and thereafter produce a witness or witnesses to testify regarding the deposition topics set forth in **Attachment A**. The Court requests that the witness be placed under oath, subject to questioning by counsel for the parties to the above-captioned matters, and that a verbatim transcript of the testimony be taken.

The Court understands that the documents and information requested may be of a confidential nature. As such, there is a Protective Order in this case to protect the confidentiality of any documents produced. A copy of the Protective Order is appended to **Attachment A**.

If service cannot be effected at the address indicated above, this Court respectfully requests judicial assistance to effect service by any means permitted under Taiwanese law.

This Court further requests that the executed Letters Rogatory and any evidence produced in response be sent directly to counsel for the Requesting Party, Ocean Semiconductor LLC ("Ocean Semiconductor"), at the following address:

Alex Chan Devlin Law Firm LLC 1526 Gilpin Avenue Wilmington, DE 19806

#### **II. FACTS**

Plaintiff Ocean Semiconductor filed lawsuits against Defendants Mediatek Inc. and Mediatek USA Inc. ("Mediatek"), NVIDIA Corporation ("NVIDIA"), NXP USA, Inc. ("NXP"), Renesas Electronics Corporation and Renesas Electronics America, Inc. ("Renesas"), Silicon Laboratories Inc. ("Silicon Labs"), STMicroelectronics, Inc. ("STMicro"), and Western Digital Technologies, Inc. ("WD") (collectively "Defendants") in the United States District Court for the Western District of Texas. Ocean seeks a judgment that Defendants infringe U.S. Patent Nos.

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