

EXHIBIT 23

EXHIBIT H

**Analysis of Infringement of U.S. Patent No. 6,660,651 by Western Digital Corporation
(Based on Public Information Only)**

Plaintiff Ocean Semiconductor LLC (“Ocean Semiconductor”), provides this preliminary and exemplary infringing analysis of U.S. Patent No. 6,660,651, entitled “ADJUSTABLE WAFER STAGE, AND A METHOD AND SYSTEM FOR PROCESS OPERATIONS USING SAME” (the “’651 patent”) by Western Digital Corporation (“WD”). The following is an exemplary analysis regarding infringement by Defendant WD’s semiconductor products, systems, devices, components, and sub-components containing such circuits, fabricated or manufactured using ASML’s semiconductor fabrication or manufacturing equipment (e.g., ASML’s TWINSCAN system). Such products include, without limitation, automotive products (e.g., iNAND® AT EM122, iNAND® AT EM132, Automotive AT LD332, AT 132 (e.g., grades 2 and 3), AT 122 (e.g., grades 2 and 3), Industrial QD332, Industrial Ext Temp IX QD332, Industrial Ext Temp IX QD334, Industrial Wide Temp IX QD342, Commercial PC SN520), connected home products (e.g., iNAND® CH EM123/133, CH LD313, CH LD513, CH QD313, CH QD513, Commercial AV-25, WD AV-GP 1000, CL SN720, CL SN520, PC SA530), industrial and IoT products (e.g., iNAND® IX EM132, iNAND® IX EU312, Industrial IX LD342, Industrial IX LD332, Industrial IX QD342, Industrial IX QD332, Industrial SN720, Commercial CL SN520, Commercial PC SN730, Commercial X600, Commercial PC SA530), mobile products (e.g., EU511, MC EU311d, MC EM131/c, MC EM121/b, MC EM111/a, Commercial CL QD501, Commercial CL QD301, Commercial surveillance products (e.g. CL EM132/122, IX EM122 Wide Temp, IX EM122 Extended Temp, WD Purple™ SC QD301 microSD™ Card), flash memory (e.g., 3D flash and NAND flash), RISC-V SweRVCore Family (e.g., EH1 and EH2), and other products, devices, and integrated circuits (“’651 Infringing Instrumentalities”).

The analysis set forth below is based only upon information from publicly available resources regarding the ’651 patent as WD has not yet provided any non-public information.

Unless otherwise noted, Ocean Semiconductor contends that WD directly infringes the ’651 patent in violation of 35 U.S.C. § 271(a) by using, selling, and/or offering to sell in the United States, and/or importing into the United States, the ’651 Infringing Instrumentalities. The following exemplary analysis demonstrates that infringement. Unless otherwise noted, Ocean Semiconductor further contends that the analysis below supports a finding of indirect infringement under 35 U.S.C. § 271(b) in conjunction with other evidence of liability.

Unless otherwise noted, Ocean Semiconductor believes and contends that each element of each claim asserted by the ’651 patent is met by WD’s provision or importation of the ’651 Infringing Instrumentalities. However, to the extent that WD attempts to allege that an element is not literally met, Ocean Semiconductor believes and contends that such elements are met under the doctrine of equivalents. Specifically, in its investigation and analysis of the ’651 Infringing Instrumentalities, Ocean Semiconductor did not identify any differences between the elements of the patent claims and the corresponding features of the ’651 Infringing Instrumentalities.

each instance, the identified feature of the '651 Infringing Instrumentalities performs at least substantially the same function in the same way to achieve substantially the same result as the corresponding claim element.

Ocean Semiconductor notes that the present claim chart and analysis are necessarily preliminary in that Ocean Semiconductor has not yet obtained substantial discovery from WD nor has WD disclosed any detailed analysis for its non-infringement position, and Ocean Semiconductor does not have the benefit of claim construction or expert discovery. Ocean Semiconductor reserves the right to amend the positions taken in this preliminary and exemplary infringement analysis, including with respect to literal infringement and under the doctrine of equivalents, if and when warranted by further information obtained by Ocean Semiconductor, including information adduced through information exchanges between the parties, fact discovery, claim construction, expert discovery, and other proceedings.

USP No. 6,660,651	Infringement by the '651 Accused Instrumentalities
<p>19. A method, comprising: providing a process chamber comprised of a wafer stage, said wafer stage having a surface that is adjustable;</p>	<p>ASML's TWINSCAN system provides a process chamber comprised of a wafer stage, t surface that is adjustable.</p> <p>For example, the TWINSCAN system performs the method of providing a process chan</p>  <p>The image shows an ASML TWINSCAN NXT1980Di lithography system. It is a large, industrial-grade machine with a white and blue color scheme. The front panel features the ASML logo and the model name 'TWINSCAN NXT1980Di'. The machine is open, revealing a complex internal structure with various components, including a wafer stage and a lens system. The machine is mounted on a dark blue base.</p> <p>See ASML DUV Lithography Systems, available at https://www.asml.com/en/products/systems/twinscan-nxt1980di (last visited Apr. 30 2019).</p> <p>The process chamber can be used for wafer exposure during lithography:</p>

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