

# EXHIBIT 2

**UNITED STATES INTERNATIONAL TRADE COMMISSION  
WASHINGTON, D.C.**

**Before The Honorable Thomas B. Pender  
Administrative Law Judge**

In the Matter of

CERTAIN COMPUTING OR GRAPHICS  
SYSTEMS, COMPONENTS THEREOF,  
AND VEHICLES CONTAINING SAME

Investigation No. 337-TA-984

**JOINT MOTION TO TERMINATE INVESTIGATION AND STAY THE  
PROCEDURAL SCHEDULE AS TO  
RESPONDENT TEXAS INSTRUMENTS BASED ON SETTLEMENT**

Pursuant to 19 U.S.C. § 1337(c) and Commission Rule 210.21(b), Complainant Advanced Silicon Technologies LLC (“Advanced Silicon”) and Respondent Texas Instruments Incorporated (“TI”) (collectively, the “Settling Parties”), hereby submit this Joint Motion to Terminate Investigation 337-TA-984 and to Stay the Procedural Schedule as to Respondent TI only, in view of a Settlement and License Agreement (“Agreement”) between the Settling Parties.

A true and correct copy of the Agreement, redacted to protect the disclosure of confidential business information, is attached to this submission as Public Exhibit A and an unredacted version in attached as Exhibit B. Contemporaneously with this filing, the Settling Parties are also filing a motion pursuant to Commission Rule 210.21(a)(1), requesting that the ALJ limit service of the unredacted agreement to the Settling Parties and Staff. Also contemporaneously with this filing, the Settling Parties are filing a public version of this motion that will attach Public Exhibit A.

Inv. No. 337-TA-984

The Agreement has been executed by the Settling Parties, and is fully effective as between them. The Agreement contains Confidential Business Information within the meaning of 19 C.F.R. § 201.6(a), including, but not limited to, license and settlement fee amounts, the disclosure of which could impair parties' ability to enter into settlement agreements. The Agreement completely resolves the dispute between the Settling Parties in this Investigation. The Agreement reflects the entire and only agreement between the Settling Parties regarding the subject matter of this Investigation. The Settling Parties represent that there are no other agreements, written or oral, express or implied, between the Settling Parties concerning the subject matter of this Investigation.

The Settling Parties agree that termination of this Investigation on the basis of settlement as to only Respondent TI does not constitute a determination as to the violation of section 337 of the Tariff Act of 1930, including as to the merits of the claims or defenses raised during this Investigation. *See* 19 C.F.R. § 210.21(b)(2).

In view of the Agreement, there no longer exists a basis upon which to continue this Investigation as to TI. Further, termination of this Investigation as to TI at this stage of the proceedings poses no threat to the public interest. Indeed, it is in the interest of the public and administrative economy to grant this motion. Commission policy and the public interest generally favor settlements, which preserve resources for both the Commission and the private parties, and motions to terminate based on settlement are routinely granted. *See, e.g., Certain Communications or Computing Devices and Components Thereof*, Inv. No. 337-TA-925, Order No. 37 (June 5, 2015) (terminating one respondent based on settlement agreement); *Certain Consumer Electronics with Display and Processing Capabilities*, Inv. No. 337-TA-884, Order No. 15 (Aug. 1, 2014) (terminating investigation based on settlement agreements among

Inv. No. 337-TA-984

complainant, certain respondents, and a third party); *Certain Consumer Electronics and Display Devices and Products Containing Same*, Inv. No. 337-TA-836, Order No. 30 at 3 (January 28, 2013) (unreviewed) (terminating investigation based on settlement agreements among complainant, remaining respondents, and a third party); *Certain Portable Communication Devices*, Inv. No. 337-TA-827, Order No. 15 at 2 (May 31, 2012) (unreviewed) (same) (citation omitted).<sup>1</sup>

Moreover, termination of this Investigation as to TI pursuant to the license and settlement Agreement will not have any adverse impact on the public health and welfare and/or competitive conditions in the United States. Accordingly, the Administrative Law Judge is authorized to issue an initial determination terminating this investigation pursuant to 19 C.F.R. § 210.21(b).

Counsel for the Settling Parties have consulted with the other Respondents and with Commission Investigative Staff Attorney regarding this motion. The Commission Investigative Attorney will provide the position of the Office of Unfair Import Investigations after reviewing these papers in more detail. The other Respondents have indicated that they do not oppose.

For the foregoing reasons, the Settling Parties respectfully request that the Administrative Law Judge grant this motion and issue an initial determination terminating this Investigation and staying the Procedural Schedule with respect to TI only based on the accompanying Agreement.

---

<sup>1</sup> See also *Certain Equipment for Telecommunications or Data Communications Networks, Including Routers, Switches, and Hubs, and Components Thereof*, Inv. No. 337-TA-574, Order No. 27 at 4 (May 24, 2007) (“termination of litigation under these circumstances is generally in the public interest as settlement avoids needless litigation and conserves public resources”); *Certain Semiconductor Chips and Products Containing Same*, Inv. No. 337-TA-753, Order No. 62 at 2-3 (February 22, 2012) (granting joint motion to partially terminate investigation on grounds that termination of the investigation based on the settlement agreement would have no adverse impact on the public interest); *Certain Video Analytics Software, Systems, Components Thereof, and Product Containing Same*, Inv. No. 337-TA-795, Order No. 19 at 1-2 (February 23, 2012) (granting joint motion to terminate, and noting that “[t]he Commission has stated that ‘in the absence of extraordinary circumstances, termination of the investigation will be readily granted to a complainant during the prehearing stage of an investigation.’”) (citations omitted).

Dated: July 26, 2016

Respectfully submitted,

By: Andrew H. DeVoogd

James M. Wodarski  
Michael T. Renaud  
Andrew H. DeVoogd  
Adam S. Rizk  
MINTZ, LEVIN, COHN, FERRIS, GLOVSKY  
AND POPEO, P.C.  
One Financial Center  
Boston, MA 02110  
Phone: (617) 542-6000  
Fax: (617) 542-2241

Aarti Shah

MINTZ, LEVIN, COHN, FERRIS, GLOVSKY  
AND POPEO, P.C.  
701 Pennsylvania Avenue NW  
Suite 900  
Washington, DC 20004  
Phone: 202.434.7300  
Fax: 202.434.7400

*Counsel for Complainant Advanced Silicon  
Technologies LLC*

By: Maureen F. Browne

Sturgis M. Sobin (ssobin@cov.com)  
Maureen F. Browne  
(mbrowne@cov.com)  
Ranganath Sudarshan  
(rsudarshan@cov.com)  
Paul J. Wilson (pwilson@cov.com)  
COVINGTON & BURLING LLP  
One CityCenter  
850 Tenth Street, NW  
Washington, DC 20001  
Telephone: (202) 662-5040

Robert T. Haslam (rhaslam@cov.com)  
Anupam Sharma (asharma@cov.com)  
COVINGTON & BURLING LLP  
333 Twin Dolphin Drive, Suite 700  
Redwood Shores, CA 94065  
Telephone: (650) 632-4700

Dale A. Rice (drice@cov.com)  
COVINGTON & BURLING LLP  
One Front Street  
San Francisco, CA 94111  
Telephone: (415) 591-6000

Email: TI-AST@cov.com

*Counsel for Respondent Texas  
Instruments Inc.*

Inv. No. 337-TA-984

# Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

## Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

## Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

## Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

## API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

## LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

## FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

## E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.