

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

ADVANCED SILICON  
TECHNOLOGIES LLC,

*Plaintiff,*

v.

NXP SEMICONDUCTORS N.V.,  
NXP B.V., and  
NXP USA, INC.,

*Defendants.*

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Case. No. 6:22-CV-0466-ADA-DTG

**DEFENDANT NXP USA, INC.'S  
OPPOSED MOTION FOR INTRA-DISTRICT TRANSFER  
TO THE AUSTIN DIVISION OF THE WESTERN DISTRICT OF TEXAS**

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Pursuant to 28 U.S.C. § 1404(a), NXP USA, Inc. (“NXP”) moves the Court to transfer this case from the Waco Division to the Austin Division of the Western District of Texas.

## **I. INTRODUCTION**

Advanced Silicon Technologies LLC (“AST”) filed this case in the Waco Division of the Western District of Texas accusing NXP of patent infringement. Dkt. 1 (“Compl.”) ¶ 4. Neither AST nor NXP has offices in this division. NXP is headquartered in Austin, and AST does not appear to have a physical presence in Texas. *See id.* ¶¶ 7, 4. The Austin Division is clearly a more convenient forum for this lawsuit. The Austin Division is more convenient in terms of likely witnesses, and Austin itself has a strong local interest in the resolution of this dispute. The Waco Division, in contrast, appears to have no connection to this lawsuit, including no related places of business, no likely witnesses, and no local interest.

This case belongs in Austin, and NXP respectfully requests that the Court transfer it there pursuant to 28 U.S.C. § 1404(a).

## **II. FACTUAL BACKGROUND**

AST asserts that NXP infringes two patents by importing, using, selling, and/or offering for sale integrated circuits that are manufactured by NXP. Compl. ¶¶ 13, 17. AST accuses the i.MX family of microprocessors (“Accused Products”) of infringing the Asserted Patents.<sup>1</sup> Ex. 1 (Ex. A to AST’s Infringement Contentions) at 1; Ex. 2 (Ex. B to AST’s Infringement Contentions) at 1.

NXP is headquartered in Austin, TX (Compl. ¶ 7) and has approximately 4,000 Austin-based employees (Ex. 3). The worldwide engineering team responsible for the design and

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<sup>1</sup> AST alleges infringement of U.S. Patent Nos. 7,804,435 and 8,933,945 (collectively, “Asserted Patents”).

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