

**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 PRELIMINARY INVALIDITY CONTENTIONS

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“invention” as set forth in the specifications of the Asserted Patents (and any specification allegedly incorporated by reference).

Additionally, the Asserted Claims fail the enablement, written description, and/or definiteness requirements in view of at least the following claim terms and phrases:

Asserted Claim(s)	Claim Term/Phrase	Invalidity Under 35 U.S.C. § 112
'945 Patent, Claims 1, 21	<p>“a memory controller on the chip in communication with the at least two graphics pipelines, operative to transfer pixel data between each of a first pipeline and a second pipeline and a memory shared among the at least two graphics pipelines”</p> <p>“a memory controller on the chip, coupled to the at least two graphics pipelines on the chip and operative to transfer pixel data between each of the two graphics pipelines and a memory shared among the at least two graphics pipelines”</p>	<p>The claims are invalid under 35 U.S.C. § 112, ¶ 2 because the claim limitation fails to inform, with reasonable certainty, those skilled in the art about the scope of the invention.</p> <p>The claims are invalid under pre-AIA 35 U.S.C. § 112, ¶ 1 because the specification fails to describe or enable the full breadth of the claims.</p>
'945 Patent, Claim 4	“front end circuitry”	The claim limitation invokes 35 U.S.C. § 112 ¶ 6 and is invalid for failure to disclose adequate corresponding structure linked to the recited claim functionality
'945 Patent, Claim 4	“back end circuitry”	The claim limitation invokes 35 U.S.C. § 112 ¶ 6 and is invalid for failure to disclose adequate corresponding structure linked to the recited claim functionality
'435 Patent, Claim 1	“a power management controller operatively couplable to a video decoder that decodes at least one encoded digital input stream and in response to a determination of encoding description data that describes a scheme used to encode the input stream, varies power consumption of at least one operational portion of the video	<p>The claims are invalid under 35 U.S.C. § 112, ¶ 2 because the claim limitation fails to inform, with reasonable certainty, those skilled in the art about the scope of the invention.</p> <p>The claims are invalid under pre-AIA 35 U.S.C. § 112, ¶ 1 because the specification fails to describe or</p>