**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*.	§ § § § § § § § § § §	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	"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" "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"	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. 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.
'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	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. The claims are invalid under pre-AIA 35 U.S.C. § 112, ¶ 1 because the specification fails to describe or