quinn emanuel trial lawyers | san francisco

50 California Street, 22nd Floor, San Francisco, California 94111-4788 | TEL (415) 875-6600 FAX (415) 875-6700

WRITER'S DIRECT DIAL NO. **(415) 875-6373**

WRITER'S EMAIL ADDRESS seanli@quinnemanuel.com

December 13, 2019

Sharre Lotfollahi Kirkland & Ellis LLP 333 South Hope Street Los Angeles, California 90071

Re: PACT XPP Schweiz AG v. Intel Corporation, Civil Action No. 19-1006- RGA (D. Del.):

PACT's Claim Narrowing and Swapping

Dear Sharre:

I write regarding PACT's claim swapping and narrowing.

As PACT repeatedly pointed out, to date Intel has not produced all its core technical documents pursuant to the Scheduling Order. Intel's failure of its core technical document production makes it impossible for PACT to narrow and swap claims as previously discussed. Nevertheless, while reserving our right to amend infringement contentions once Intel complies with Court Orders, to further anticipated reciprocal good faith, PACT provides the following provisional narrowing. To the extent new claims are swapped in, PACT hereby serves its amended claim charts.

Patent No.	Asserted Claims
7,928,763	1-3, 9-14, 16-22, 24, 26, 30, 31-33, 39-44, 46-52, 54, 56, and 60
8,301,872	2, 4, 6, 10, 12, 14, 15, 16 (depending on 2), 16 (depending on 4), 16 (depending on 6), 16 (depending on 10), and 16 (depending on 12)
8,312,301	3, 6, 7, 8, 9, 10, 12, 13 (depending on 8), 13 (depending on 10), 13 (depending on 11), 14 (depending on 8), 14 (depending on 10), 14 (depending on 11), 16 (depending on 8), 16 (depending on 10), 16 (depending on 11), 16 (depending on 15), 17 (depending on 12), 18, 19, 23, 24, 25, 26, 32, 35, 36, 30 (depending on 13 depending on 8),

quinn emanuel urquhart & sullivan, Ilp

Patent No.	Asserted Claims
	30 (depending on 13 depending on 11), 30 (depending on 13 depending on 10)
8,471,593	1, 2, 4 (depending on 1), 4 (depending on 2), 5 (depending on 1), 6 (depending on 1), 6 (depending on 2), 7 (depending on 2), 8 (depending on 1), 8 (depending on 2), 9 (depending on 8 depending on 1), 9 (depending on 9 depending on 2), 10 (depending on 1), 11 (depending on 1), 14 (depending on 1), 15 (depending on 1), 16, 17 (depending on 16), 21 (depending on 16), 22 (depending on 16), 23 (depending on 16), 24 (depending on 23 depending on 16), 25 (depending on 16), 26 (depending on 16), and 27 (depending on 16).
8,686,549	36, 37, 38, 39, 40, 41, 45, 47, 48, 49, 50, and 52
8,819,505	1, 3, 5, 7, 8, 12-18, and 27
9,037,807	1, 2, 3, 4, 5, 6, 24, 26, 27, 29, 32, 44, 73, and 74
9,075,605	1-6
9,170,812	1-5, 8, 9, 12-18
9,250,908	4 and 5
9,436,631	1-4
9,552,047	1-18, 20-24, 27, 30, 33

Very truly yours,

46

Ziyong "Sean" Li