

SENSOR ELECTRONIC TECHNOLOGY,
INC.,

Case No. 6:21-cv-00322-ADA

JURY TRIAL DEMANDED

Defendants.

In accordance with this Court's Order Governing Proceedings in Patent Cases, these infringement contentions are preliminary. Plaintiff's investigation is on-going, and discovery has yet to commence. These disclosures are based on information available to Plaintiff at this time. Plaintiff reserves the right to supplement these disclosures as information becomes available.

Plaintiff reserves the right to assert additional claims of the Asserted Patents, accuse different products, or find alternative literal and/or equivalent infringement elements in the accused products.

**I. DISCLOSURE OF PRELIMINARY INFRINGEMENT CONTENTIONS
PURSUANT TO THE ORDER GOVERNING PROCEEDINGS IN PATENT
CASES**

**A. IDENTIFICATION OF ACCUSED PRODUCTS MEETING EACH
ELEMENT OF THE ASSERTED CLAIMS**

Defendants infringe the following claims of the Asserted Patents:

- '562 Patent: claims 1, 4, 7, 9, and 10
- '420 Patent: claims 1, 2, 4, 5, and 12-14
- '906 Patent: claims 1-4
- '117 Patent: claim 1
- '496 Patent: claims 1, 3, 4, 16, and 17
- '848 Patent: claims 1, 2, 4, 10-12, 15, and 16
- '156 Patent: claims 1 and 7
- '952 Patent: claims 1-5, 7, and 11-14
- '785 Patent: claims 1, 2, 4, 7, 10-12, 15, and 16

Defendants have infringed and continue to infringe the above claims of the Asserted Patents literally and under the doctrine of equivalents by making, using, offering to sell, selling, and/or importing into the United States at least the following Accused Devices: LTPL-G35UV275GC-E; LTPL-G35UV275GR-E; LTPL-C034UVH365; LTPL-C034UVH385.

Charts identifying a location of every element of every Asserted Patent are attached hereto as Exhibits 1-17. Based on Plaintiff's good faith belief, the citations in the claim charts are representative of the Accused Devices. Where Plaintiff cites to sections representing a certain

Accused Device, that citation is representative for all other Lite-On devices that include the same or substantially similar semiconductor structures, layers, and devices as detailed in Exhibits 1-17 including all prior and future versions unless otherwise noted. Plaintiff reserves the right to amend these claim charts, as well as other information contained in this document and exhibits hereto, to incorporate new information learned during the course of discovery.

B. PRIORITY DATE OF EACH ASSERTED CLAIM

Each of the asserted claims of the Accused Patents are entitled to a priority date at least as early as identified below. Plaintiff reserves the right to establish an earlier date of invention based upon actions relating to conception and reduction to practice of the claimed inventions for those patents subject to pre-AIA treatment.

Patent	Claims	Accused Product	Priority Date
8,552,562	1, 4, 7, 9, and 10	LTPL-G35UV275GC-E LTPL-G35UV275GR-E	6/1/2009
9,042,420	1, 2, 4, 5, and 12-14	LTPL-G35UV275GC-E LTPL-G35UV275GR-E	8/11/2011
9,330,906	1-4	LTPL-G35UV275GC-E	5/1/2013
9,923,117	1	LTPL-G35UV275GC-E LTPL-G35UV275GR-E LTPL-C034UVH365 LTPL-C034UVH385	2/25/2013
9,966,496	1, 3, 4, 16, and 17	LTPL-G35UV275GC-E LTPL-G35UV275GR-E	1/9/2013
10,147,848	1, 2, 4, 10-12, 15, and 16	LTPL-G35UV275GC-E LTPL-G35UV275GR-E	10/1/2015
10,411,156	1 and 7	LTPL-G35UV275GC-E LTPL-G35UV275GR-E	8/11/2011
10,460,952	1-5, 7, and 11-14	LTPL-G35UV275GC-E	5/1/2013
10,854,785	1, 2, 4, 7, 10-12, 15, and 16	LTPL-G35UV275GC-E	10/1/2015

C. DOCUMENTS EVIDENCING CONCEPTION AND REDUCTION TO PRACTICE AND FILE HISTORIES FOR THE ASSERTED PATENTS

Plaintiff has conducted, and is continuing, its search for non-privileged documents that relate to the conception and/or reduction to practice of the Asserted Patents and will produce such documents if found. The Asserted Patents and their file histories are being produced at SETI-LITEON_00000001-4531. Privileged documents related to conception and/or the reduction of practice will be logged at a time mutually agreed to by the parties for privilege log exchanges. Plaintiff is continuing its investigation, and reserves the right to amend and/or supplement its production as those documents are located.

Dated: July 27, 2021

Respectfully submitted,

/s/Kevin S. Kudlac

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CERTIFICATE OF SERVICE

A true and correct copy of the foregoing instrument was served or delivered electronically via email to all counsel of record on this 27th day of July 2021.

/s/ Kevin S. Kudlac
Kevin S. Kudlac