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15 *Attorneys for Plaintiff Intel Corporation*

16 **UNITED STATES DISTRICT COURT**
17 **NORTHERN DISTRICT OF CALIFORNIA**

18 INTEL CORPORATION,)	CASE NO. 3:21-cv-3398
)	
19 Plaintiff,)	COMPLAINT FOR DECLARATORY
)	JUDGMENT
20 v.)	
)	DEMAND FOR JURY TRIAL
21 TRENCHANT BLADE TECHNOLOGIES,)	
22 LLC AND LONGHORN IP LLC,)	
23 Defendants.)	

1 Plaintiff Intel Corporation (“Intel”), for its Complaint against Defendants Trenchant Blade
2 Technologies, LLC (“Trenchant”) and Longhorn IP LLC (“Longhorn”) (collectively, “Defendants”),
3 alleges as follows. Each allegation in this Complaint either has evidentiary support based on public
4 information available to Intel or disclosures from Defendants, or is likely to have evidentiary support after
5 a reasonable opportunity for further investigation and discovery.

6 **NATURE OF THE ACTION**

7 1. This action arises from Defendants’ efforts at enforcement of United States Patent No.
8 7,056,821 (the “’821 Patent”), U.S. Patent No. 6,720,619 (the “’619 Patent”), U.S. Patent No.
9 7,511,332 (the “’332 Patent”), U.S. Patent No. 7,498,642 (the “’642 Patent”), or U.S. Patent No.
10 7,494,846 (the “’846 Patent”) (collectively, the “Patents-in-Suit”). Intel asserts claims for declaratory
11 judgment of non-infringement of the Patents-in-Suit pursuant to the Declaratory Judgment Act,
12 28 U.S.C. §§ 2201-02, and the Patent Laws of the United States, 35 U.S.C. § 100 *et seq.*, and for such
13 other relief as the Court deems just and proper.

14 **THE PARTIES**

15 2. Intel is a corporation organized and existing under the laws of the State of Delaware
16 having its principal place of business at 2200 Mission College Boulevard, Santa Clara, California
17 95054. Intel does business in the Northern District of California (“District”).

18 3. Upon information and belief, Trenchant is a limited liability company existing under
19 the laws of the state of Texas having its principal place of business at 5204 Bluewater Drive, Frisco,
20 Texas 75034. Upon information and belief, Trenchant is a non-practicing entity, which aims to license
21 its patent portfolio to others.

22 4. Upon information and belief, Longhorn is a limited liability company existing under
23 the laws of the state of Texas having its principal place of business at 8105 Razor Boulevard, Suite 210,
24 Plano, Texas 75024. Upon information and belief, Longhorn is a non-practicing entity, which aims to
25 license its patent portfolio to others.

JURISDICTION AND VENUE

1
2 5. This Court has exclusive subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331,
3 1338(a), 2201, and 2202, and the Patent Laws of the United States, 35 U.S.C. § 1 *et seq.*

4 6. Intel brings this suit based on an actual, substantial, and continuing justiciable
5 controversy existing between Intel and Defendants regarding whether Intel’s products or processes
6 infringe the Patents-in-Suit. As described in more detail below, this controversy arises out of
7 Longhorn’s and Trenchant’s infringement assertions and licensing demands to Intel, in which
8 Longhorn and Trenchant broadly allege that the Patents-in-Suit cover technologies implemented by
9 Intel’s products and processes and that Intel requires a license. Intel accordingly requests a judicial
10 determination of its rights regarding the Patents-in-Suit.

11 7. This Court has personal jurisdiction over Trenchant and Longhorn by virtue of their
12 sufficient minimum contacts with this forum. Upon information and belief, Defendants, directly or
13 through their agents and alter egos, have regularly conducted business activities in California, and this
14 action arises out of and relates to activities that Defendants have purposefully directed at California
15 and this District. Among other things, Defendants purposefully directed allegations of patent
16 infringement to Intel, a resident of this District, by sending a patent assertion letter to Intel (the “Patent
17 Assertion Letter”) alleging that Intel and its affiliates/subsidiaries infringe one or more claims of the
18 Patents-in-Suit. The letter was addressed and directed to Intel’s Santa Clara, California office, which
19 is in this District. A true and correct copy of the Patent Assertion Letter is attached as Exhibit A.

20 8. Defendants subsequently met with Intel representatives who are based in this District
21 and attended the meeting from this District to discuss Defendants’ infringement assertions. Additional
22 discussions relating to Defendants’ infringement allegations continued and included Intel
23 representatives who are based in this District and attended from this District.

24 9. The Intel products and activities that Defendants accuse of infringing the Patents-in-
25 Suit were developed and/or performed by Intel, including development and sales activities taking place
26 in this District.

1 10. Upon information and belief, Longhorn’s associated entities, including Trenchant,
2 Katana Silicon Technologies, LLC (“KST”), Lone Star Silicon Innovations LLC (“Lone Star”), and
3 others, are alter egos of Longhorn. Upon information and belief, Longhorn dominates and controls
4 the actions of its associated entities and, specifically, directs and controls their patent enforcement
5 activities. Longhorn’s associated entities do not appear to have separate websites, and are identified
6 on Longhorn’s website, longhornip.com, as mere “Portfolio” entities holding IP assets for the benefit
7 of Longhorn.

8 11. Upon information and belief, Longhorn’s associated entities, under the control of
9 Longhorn President and CEO Khaled Fekih-Romdhane, have accused several companies residing in
10 this District of patent infringement. For example, KST brought an action for patent infringement
11 against Taiwan Semiconductor Manufacturing Company, Ltd. and two of its California subsidiaries
12 residing in this District (collectively, “TSMC”), in the Western District of Texas (Case No. 6:19-cv-
13 00695). Upon information and belief, Defendants obtained the Patents-in-Suit in a settlement of that
14 lawsuit. In particular, upon information and belief, Mr. Fekih-Romdhane caused Trenchant to be
15 created in January 2020 and caused TSMC to assign Trenchant the Patents-in-Suit.

16 12. Further, Longhorn, by and through its subsidiary, Lone Star, filed lawsuits in this
17 District in 2017 against STMicroelectronics, Inc. (“STM”) (Case No. 3:17-cv-07206) and in 2018
18 against Micron Technology, Inc. (“Micron”) (Case No. 3:18-cv-01680). Further, Lone Star consented
19 to transfer of cases to this District from the Eastern District of Texas on several occasions. *See Lone*
20 *Star Silicon Innovations LLC v. Renesas Electronics Corporation et al.*, Case No. 3:17-cv-03981 (N.D.
21 Cal.) (Dkt. No. 43); *Lone Star Silicon Innovations LLC v. Semiconductor Manufacturing International*
22 *Corporation et al.*, Case No. 3:17-cv-03980 (N.D. Cal.) (Dkt. No. 33); *Lone Star Silicon Innovations*
23 *LLC v. United Microelectronics Corporation et al.*, Case No. 3:17-cv-04033 (N.D. Cal.) (Dkt. No.
24 28); *Lone Star Silicon Innovations LLC v. Toshiba Corporation et al.*, Case No. 3:17-cv-04034 (N.D.
25 Cal.) (Dkt. No. 153); *Lone Star Silicon Innovations LLC v. Nanya Technology Corporation et al.*, Case
26 No. 3:17-cv-04032 (N.D. Cal.) (Dkt. No. 28). Upon information and belief, Longhorn representatives
27 traveled to California for these matters in furtherance of their patent licensing business.

1 13. Upon information and belief, Longhorn and its associated entities engage in licensing,
2 patent acquisition, and litigation activities in this District, which activities Longhorn announces and
3 advertises on Longhorn’s website, www.longhornip.com/news.

4 14. Upon information and belief, Mr. Fekih-Romdhane is the common representative of
5 Longhorn’s associated entities, and he acts and negotiates on their collective behalf. For example,
6 Mr. Fekih-Romdhane uses Longhorn IP letterhead and his Longhorn IP email address when
7 communicating on behalf of Longhorn’s alter ego entities, including Trenchant. Mr. Fekih-Romdhane
8 is also Trenchant’s sole manager. On information and belief, Trenchant has no employees of its own,
9 and its registered place of business is Mr. Fekih-Romdhane’s home address. Trenchant executed a
10 licensing service agreement with Longhorn to act as Trenchant’s agent and monetize its patents.

11 15. Upon information and belief, Mr. Fekih-Romdhane and Longhorn create entities for
12 the purpose of assigning intellectual property rights, widely licensing such rights, and bringing
13 infringement suits by and through its associated entities. Upon information and belief, Longhorn has
14 created its associated entities to allow its alter egos to assert infringement claims nationally or globally
15 while attempting to limit or insulate itself and its associated entities from being subject to personal
16 jurisdiction outside of Texas.

17 16. Upon information and belief, Defendants and their agents and alter egos have sent, or
18 caused to be sent, other patent assertion and/or licensing demand letters to other persons and/or
19 companies in this District as part of its patent licensing business. Upon information and belief,
20 Defendants and their agents and alter egos have charged infringement and threatened litigation against
21 numerous companies residing and conducting business in this District.

22 17. For example, in the patent assertion letter directed to Intel giving rise to this matter,
23 Defendants stated their intent to negotiate and enter into license agreements for the Patents-in-Suit
24 with companies either resident in this District or with operations and/or subsidiaries located in this
25 District, including “Samsung, Micron, SK hynix, Global Foundries, UMC, and SMIC.”

26 18. Upon information and belief, Defendants sent such a patent assertion letter to at least
27 Samsung alleging that Samsung infringes the Trenchant patent portfolio, including at least the ’846,

1 '821, and '619 patents at issue in this action. As a result, Samsung filed a declaratory judgment action
2 in this District. *See Samsung Electronics Co. Ltd. et al v. Trenchant Blade Technologies, LLC et al*,
3 Case No. 3:20-cv-08205 (N.D. Cal. Nov. 20, 2020), ECF No. 1. In that complaint, Samsung alleged
4 that, prior to Samsung filing its complaint, Samsung and Defendants engaged in licensing negotiations
5 that included Samsung representatives participating from this District.

6 19. Venue is proper in this judicial district pursuant to 28 U.S.C. § 1391.

7 **INTRADISTRICT ASSIGNMENT**

8 20. This case is an Intellectual Property Action under Civil Local Rule 3-2(c) and, pursuant
9 to Civil Local Rule 3-5(b), shall be assigned on a district-wide basis.

10 **FACTUAL ALLEGATIONS**
11 **PATENTS-IN-SUIT**

12 21. The '821 Patent states on its cover that it was issued on June 6, 2006, and names as
13 inventors Chin-Tien Yang of Hsinchu, Taiwan; Juan-Jann Jou of Tainan Hsien, Taiwan; Yu-Hua Lee
14 of Hsinchu, Taiwan; and Chia-Hung Lai of Hsinchu, Taiwan. The '821 Patent also states that the initial
15 assignee of the '821 Patent was Taiwan Semiconductor Manufacturing Company, Ltd. of Hsin-Chu,
16 Taiwan. On information and belief, Trenchant purports to own by assignment the '821 Patent. A
17 copy of the '821 patent is attached hereto as Exhibit B.

18 22. The '619 Patent states on its cover that it was issued on April 13, 2004, and names as
19 inventors Hao-Yu Chen, of Kaoshiung, Taiwan; Yee-Chia Yeo of Albany, CA; Fu-Liang Yang of
20 Hsin-Chu, Taiwan; and Chenming Hu of Hsin-Chu, Taiwan. The '619 Patent also states that the initial
21 assignee of the '619 Patent was Taiwan Semiconductor Manufacturing Company, Ltd. of Hsin-Chu,
22 Taiwan. On information and belief, Trenchant purports to own by assignment the '619 Patent. A
23 copy of the '619 patent is attached hereto as Exhibit C.

24 23. The '332 Patent states on its cover that it was issued on March 31, 2009, and names as
25 inventor Shih-I Yang of Taipei, Taiwan. The '332 Patent also states that the initial assignee of the '332
26 Patent was Taiwan Semiconductor Manufacturing Company, Ltd. of Hsinchu, Taiwan. On information
27

1 and belief, Trenchant purports to own by assignment the '332 Patent. A copy of the '332 patent is
2 attached hereto as Exhibit D.

3 24. The '642 Patent states on its cover that it was issued on March 3, 2009, and names as
4 inventors Chien-Hao Chen of Chuangwei Township, Taiwan; Chun-Feng Nieh of Baoshan Township,
5 Taiwan; Karen Mai of Jhonghe, Taiwan; and Tze-Liang Lee of Hsinchu, Taiwan. The '642 Patent also
6 states that the initial assignee of the '642 Patent was Taiwan Semiconductor Manufacturing Company,
7 Ltd. of Hsin-Chu, Taiwan. On information and belief, Trenchant purports to own by assignment the
8 '642 Patent. A copy of the '642 patent is attached hereto as Exhibit E.

9 25. The '846 Patent states on its cover that it was issued on February 24, 2009, and names
10 as inventors Chao-Shun Hsu of San-Shin, Taiwan; Louis Liu of Hsin-Chu, Taiwan; Clinton Chao of
11 Hsin-Chu, Taiwan; and Mark Shane Peng of Hsin-Chu, Taiwan. The '846 Patent also states that the
12 initial assignee of the '846 Patent was Taiwan Semiconductor Manufacturing Company, Ltd. of Hsin-
13 Chu, Taiwan. On information and belief, Trenchant purports to own by assignment the '846 Patent.
14 A copy of the '846 patent is attached hereto as Exhibit F.

15 **DISPUTE BETWEEN INTEL AND DEFENDANTS**

16 26. On April 19, 2020, Mr. Fekih-Romdhane, as President and CEO of Longhorn, sent the
17 Patent Assertion Letter to Intel alleging infringement of the Trenchant patent portfolio and contending
18 Longhorn was authorized by Trenchant to negotiate a license for Intel to that portfolio.

19 27. The Patent Assertion Letter defines Intel to include its “subsidiaries/affiliates” and
20 specifically accuses Intel of importing into the United States, and selling and offering to sell in the
21 United States “integrated circuit devices that infringe one or more of the [Trenchant] patents.” It
22 further accuses Intel of “induc[ing] other companies, such as distributors, resellers and end-users, to
23 perform one or more of these infringing acts in the United States.”

24 28. The Patent Assertion Letter further discusses Longhorn’s intent to license the patent
25 portfolio to other companies, including Samsung, Micron, SK hynix, Global Foundries, UMC and
26 SMIC.

1 35. A judicial declaration is necessary and appropriate so that Intel may ascertain its rights
2 regarding the '821 Patent.

3 36. Intel is entitled to a judicial declaration that it has not infringed and does not infringe
4 the '821 Patent.

5 **COUNT II**
6 **DECLARATORY JUDGMENT OF NON-INFRINGEMENT OF U.S. PATENT NO. 6,720,619**

7 37. Intel repeats and realleges the allegations in paragraphs 1–36 of its Complaint.

8 38. Defendants have asserted and continue to assert that Intel and its subsidiaries/affiliates
9 infringe one or more claims of the '619 Patent by importing into, and selling and offering for sale, in
10 the United States certain products and that Intel and its subsidiaries/affiliates induce others to infringe
11 one or more claims of the '619 Patent. In particular, Defendants alleged that “all integrated circuit
12 devices made using the Intel 10 nm and 14 nm advanced node FinFet transistors process, as shown,
13 for example, in Intel i3-812U Cannon using Intel’s 10 nm node FinFet high-k metal gate (HKMG)
14 CMOS process and Intel Broadwell SR217 Core M-5Y10 Microprocessor using 14 nm node FinFet
15 transistor manufacturing process” (collectively, “'619 Patent Accused Products”) infringe at least
16 claims 1, 3, 4, 5, 6, 7, 10, 13, 14, and 15 of the '619 Patent.

17 39. Intel and Intel’s subsidiaries/affiliates have not and do not directly or indirectly
18 infringe any claim of the '619 Patent, either literally or under the doctrine of equivalents, through the
19 importation, manufacture, use, sale, and/or offer for sale of the '619 Patent Accused Products. Intel
20 and Intel’s subsidiaries/affiliates do not indirectly infringe any claim of the '619 Patent at least because
21 there is no direct infringement.

22 40. For example, the '619 Patent Accused Products do not use semiconductor-on-insulator
23 (SOI) substrates, as required by all claims of the '619 Patent.

24 41. As a result of the acts described in the foregoing paragraphs, there exists a substantial
25 controversy of sufficient immediacy and reality to warrant the issuance of a declaratory judgment.

26 42. A judicial declaration is necessary and appropriate so that Intel may ascertain its rights
27 regarding the '619 Patent.

1 43. Intel is entitled to a judicial declaration that it has not infringed and does not infringe
2 the '619 Patent.

3 **COUNT III**
4 **DECLARATORY JUDGMENT OF NON-INFRINGEMENT OF U.S. PATENT NO. 7,511,332**

5 44. Intel repeats and realleges the allegations in paragraphs 1–43 of its Complaint.

6 45. Defendants have asserted and continue to assert that Intel and its subsidiaries/affiliates
7 infringe one or more claims of the '332 Patent by importing into, and selling and offering for sale, in
8 the United States certain products and that Intel and its subsidiaries/affiliates induce others to infringe
9 one or more claims of the '332 Patent. In particular, Defendants alleged that “all integrated circuit
10 devices made using the vertical array of flash memory cells, as shown, for example, in the Intel B17A
11 512Gb using Intel’s 20 nm 64L 3D2 NAND triple-level cell (TLC) CMOS process in which the
12 vertical NAND flash memory cells are manufactured to provide a stackable flash memory array to
13 increase storage capacity” (collectively, “’332 Patent Accused Products”) infringe at least claims 1, 4,
14 and 5 of the '332 Patent.

15 46. Intel and Intel’s subsidiaries/affiliates have not and do not directly or indirectly
16 infringe any claim of the '332 Patent, either literally or under the doctrine of equivalents, through the
17 importation, manufacture, use, sale, and/or offer for sale of the '332 Patent Accused Products. Intel
18 and Intel’s subsidiaries/affiliates do not indirectly infringe any claim of the '332 Patent at least because
19 there is no direct infringement.

20 47. For example, the '332 Patent Accused Products products do not include a “source line”
21 or “a plurality of source-lines” as required by all claims of the '332 Patent.

22 48. As a result of the acts described in the foregoing paragraphs, there exists a substantial
23 controversy of sufficient immediacy and reality to warrant the issuance of a declaratory judgment.

24 49. A judicial declaration is necessary and appropriate so that Intel may ascertain its rights
25 regarding the '332 Patent.

26 50. Intel is entitled to a judicial declaration that it has not infringed and does not infringe
27 the '332 Patent.

1 **COUNT IV**
2 **DECLARATORY JUDGMENT OF NON-INFRINGEMENT OF U.S. PATENT NO. 7,498,642**

3 51. Intel repeats and realleges the allegations in paragraphs 1–50 of its Complaint.

4 52. Defendants have asserted and continue to assert that Intel and its subsidiaries/affiliates
5 infringe one or more claims of the '642 Patent by importing into, and selling and offering for sale, in
6 the United States certain products and that Intel and its subsidiaries/affiliates induce others to infringe
7 one or more claims of the '642 Patent. For example, the Patent Assertion Letter asserts that Trenchant
8 owns a portfolio of patents and that “[w]e believe that products of Intel Corporation and its
9 subsidiaries/affiliates (‘Intel’) infringe [Trenchant’s] patented semiconductor technologies and are
10 made using infringing fabrication methods, and thus require a license” and in particular that Intel’s
11 “integrated circuit devices ... infringe one or more of the [Trenchant] patents.” Trenchant’s portfolio
12 includes the '642 Patent. Further, during the parties’ post-Patent Assertion Letter discussions,
13 Defendants alleged that Intel infringes at least claim 11 of the '642 Patent.

14 53. Intel and Intel’s subsidiaries/affiliates have not and do not directly or indirectly infringe
15 any claim of the '642 Patent, either literally or under the doctrine of equivalents, through the
16 importation, manufacture, use, sale, and/or offer for sale of Intel’s integrated circuit devices. Intel and
17 Intel’s subsidiaries/affiliates do not indirectly infringe any claim of the '642 Patent at least because
18 there is no direct infringement.

19 54. For example, Intel’s accused products do not use a “diffusion-retarding region that
20 comprises fluorine,” as required by all claims of the '642 Patent.

21 55. As a result of the acts described in the foregoing paragraphs, there exists a substantial
22 controversy of sufficient immediacy and reality to warrant the issuance of a declaratory judgment.

23 56. A judicial declaration is necessary and appropriate so that Intel may ascertain its rights
24 regarding the '642 Patent.

25 57. Intel is entitled to a judicial declaration that it has not infringed and does not infringe
26 the '642 Patent.

1 **COUNT V**
2 **DECLARATORY JUDGMENT OF NON-INFRINGEMENT OF U.S. PATENT NO. 7,494,846**

3 58. Intel repeats and realleges the allegations in paragraphs 1–57 of its Complaint.

4 59. Defendants have asserted and continue to assert that Intel and its subsidiaries/affiliates
5 infringe one or more claims of the '846 Patent by importing into, and selling and offering for sale, in
6 the United States certain products and that Intel and its subsidiaries/affiliates induce others to infringe
7 one or more claims of the '846 Patent. For example, the Patent Assertion Letter asserts that Trenchant
8 owns a portfolio of patents and that “[w]e believe that products of Intel Corporation and its
9 subsidiaries/affiliates (‘Intel’) infringe [Trenchant’s] patented semiconductor technologies and are
10 made using infringing fabrication methods, and thus require a license” and in particular that Intel’s
11 “integrated circuit devices ... infringe one or more of the [Trenchant] patents.” Trenchant’s portfolio,
12 which on information and belief only includes five patents, also includes the '846 Patent.

13 60. Intel and Intel’s subsidiaries/affiliates have not and do not directly or indirectly infringe
14 any claim of the '846 Patent, either literally or under the doctrine of equivalents, through the
15 importation, manufacture, use, sale, and/or offer for sale of Intel’s integrated circuit devices. Intel and
16 Intel’s subsidiaries/affiliates do not indirectly infringe any claim of the '846 Patent at least because
17 there is no direct infringement.

18 61. For example, one of the two independent claims of the '846 Patent, claim 1, requires
19 “a first semiconductor die and a second semiconductor die [that are both] identical [and] ... vertically
20 aligned.” The independent claims of the '846 Patent, claim 12, requires “a first memory die and a
21 second memory die identical to the first memory die,” wherein “the first memory die and the second
22 semiconductor dies are vertically aligned.” Intel’s accused products do not have first and second
23 semiconductor/memory die that are “identical” and “vertically aligned,” as required by all the claims
24 of the '846 Patent.

25 62. As a result of the acts described in the foregoing paragraphs, there exists a substantial
26 controversy of sufficient immediacy and reality to warrant the issuance of a declaratory judgment.

1 DATED: May 6, 2021

Respectfully submitted,

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