UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

SENSOR ELECTRONIC TECHNOLOGY, INC., a New York Corporation Plaintiff, v. MOUSER ELECTRONICS, INC. Defendant.	Case No. 3:21-cv-00086-K

SECOND AMENDED COMPLAINT FOR PATENT INFRINGEMENT AND DEMAND FOR JURY TRIAL

Pursuant to the parties' agreement, and consent obtained from Mouser Electronics, Inc. ("Mouser"), Plaintiff Sensor Electronic Technology, Inc. ("SETi" or "Plaintiff") hereby provides its Second Amended Complaint against defendant Mouser Electronics, Inc. ("Mouser") pursuant to Federal Rule of Civil Procedure 15(a)(2), and alleges as follows:

INTRODUCTION

1. SETi brings this patent infringement action to protect its valuable patented technology related to ultraviolet light-emitting diodes ("UV LEDs"). A UV LED is a semiconductor device that converts electrical energy into ultraviolet light. Ultraviolet light has many applications including optical sensors, disinfection, forensics, medical imaging, protein analysis, and polymer curing. UV LEDs have many advantages over conventional UV lamps, including lower energy consumption, longer lifetime, and smaller size.

2. SETi was founded in 1999 at the Rensselaer Polytechnic Institute in New York State and relocated to Columbia, South Carolina in 2002. In 2004,

SETi launched the world first commercially available deep UV LED with emission wavelengths shorter than 365 nm. Today, SETi is the world's leading supplier of deep UV LEDs and has over 300 issued U.S. patents related to this technology.

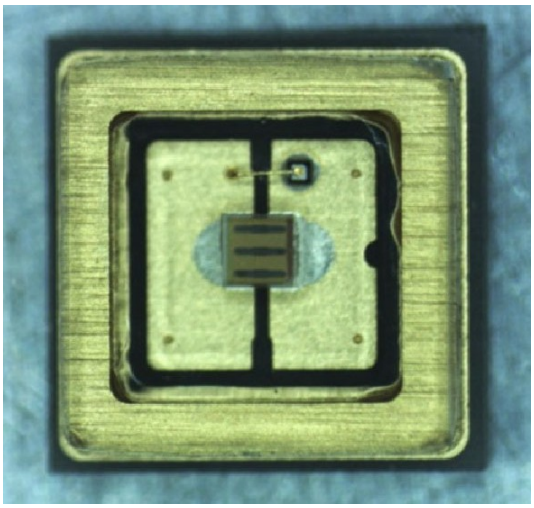
THE PARTIES

3. Plaintiff SETi is a company organized and existing under the laws of the State of New York with its principal place of business at 1195 Atlas Rd., Columbia, South Carolina.

4. On information and belief, defendant Mouser is a company organized and existing under the laws of the State of Delaware with its principal place of business at 1000 North Main Street, Mansfield, Texas.

5. On information and belief, Mouser is in the business of offering for sale, selling, and distributing products that incorporate UV LEDs.

6. Among Mouser's products are the Lite-on LTPL-G35UV275GC-E UV LED. An image of the LTPL-G35UV275GC-E UV LED is reproduced below. Upon information and belief, this product was manufactured and supplied by Lite-on.



JURISDICTION AND VENUE

7. This is an action for patent infringement, under the patent laws of the United States, 35 U.S.C. § 271 *et seq*. This Court has subject matter jurisdiction under 28 U.S.C. §§1496 and 1338(a).

8. This Court has personal jurisdiction over Mouser because, upon information and belief, it maintains a principal place of business in Texas.

9. Venue is proper within this judicial district under 28 U.S.C. §1400(b) because Mouser resides in this judicial district and/or Mouser has committed acts of infringement in this judicial district and has a regular and established place of business within this judicial district.

PATENTS-IN-SUIT

10. On May 3, 2016, the United States Patent and Trademark Office duly and legally issued U.S. Patent No. 9,330,906 ("the '906 Patent"), entitled "Stress Relieving Semiconductor Layer," to Shatalov *et al*. SETi is the owner by assignment of the '906 Patent. A true and correct copy of the '906 Patent is attached hereto as Exhibit 1.

11. On October 29, 2019, the United States Patent and Trademark Office duly and legally issued U.S. Patent No. 10,460,952 ("the '952 Patent"), entitled "Stress Relieving Semiconductor Layer," to Shatalov *et al*. SETi is the owner by assignment of the '952 Patent. A true and correct copy of the '952 Patent is attached hereto as Exhibit 2.

12. On October 8, 2013, the United States Patent and Trademark Office duly and legally issued U.S. Patent No. 8,552,562 ("the '562 Patent"), entitled "Profiled Contact for Semiconductor Device," to Simin *et al*. SETi is the owner by assignment of the '562 Patent. A true and correct copy of the '562 Patent is attached hereto as Exhibit 3.

13. On December 4, 2018, the United States Patent and Trademark Office duly and legally issued U.S. Patent No. 10,147,848 ("the '848 Patent"), entitled "Contact Configuration for Optoelectronic Device," to Gaevski *et al*. SETi is the owner by assignment of the '848 Patent. A true and correct copy of the '848 Patent is attached hereto as Exhibit 4.

14. On December 1, 2020, the United States Patent and Trademark Office duly and legally issued U.S. Patent No. 10,854,785 ("the '785 Patent"), entitled "Contact Configuration for Optoelectronic Device," to Dobrinsky *et al*. SETi is the owner by assignment of the '785 Patent. A true and correct copy of the '785 Patent is attached hereto as Exhibit 5.

15. On May 8, 2018, the United States Patent and Trademark Office duly and legally issued U.S. Patent No. 9,966,496 ("the '496 Patent"), entitled "Light

Emitting Heterostructure with Partially Relaxed Semiconductor layer," to Shatalov *et al*. SETi is the owner by assignment of the '496 Patent. A true and correct copy of the '496 Patent is attached hereto as Exhibit 6.

16. On May 26, 2015, the United States Patent and Trademark Office duly and legally issued U.S. Patent No. 9,042,420 ("the '420 Patent"), entitled "Device with Transparent and Higher Conductive Regions in Lateral Cross Section of Semiconductor Layer," to Shur *et al*. SETi is the owner by assignment of the '420 Patent. A true and correct copy of the '420 Patent is attached hereto as Exhibit 7.

17. On September 10, 2019, the United States Patent and Trademark Office duly and legally issued U.S. Patent No. 10,411,156 ("the '156 Patent"), entitled "Device with Transparent and Higher Conductive Regions in Lateral Cross Section of Semiconductor Layer," to Shur *et al*. SETi is the owner by assignment of the '156 Patent. A true and correct copy of the '156 Patent is attached hereto as Exhibit 8.

18. On March 20, 2018, the United States Patent and Trademark Office duly and legally issued U.S. Patent No. 9,923,117 ("the '117 Patent"), entitled "Semiconductor Structure with Inhomogeneous Regions," to Shatalov et al. SETi is the owner by assignment of the '117 Patent. A true and correct copy of the '117 Patent is attached hereto as Exhibit 9.

COUNT I

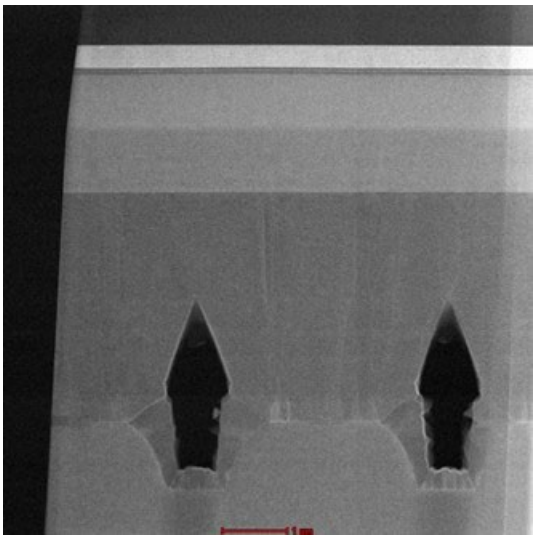
INFRINGEMENT OF THE '906 PATENT

EXAMPLE CLAIM 1

19. Mouser has infringed and continues to infringe one or more claims of the '906 Patent, including but not limited to exemplary claim 1, pursuant to 35 U.S.C. § 271(a) at least by without authority making, using, offering to sell, and/or

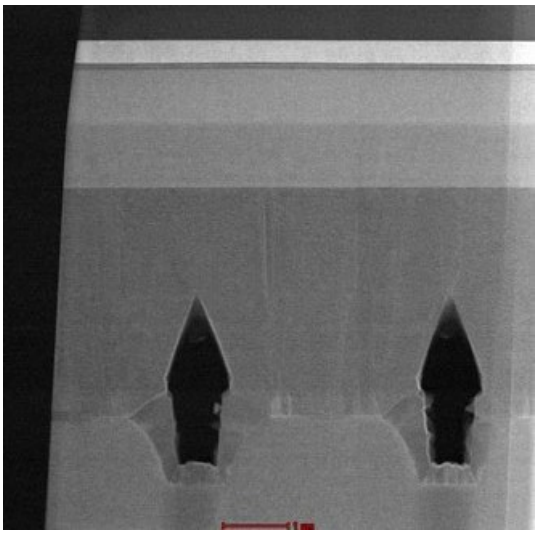
selling the LTPL-G35UV275GC-E UV LED within the United States or importing the LTPL-G35UV275GC-E UV LED into the United States.

20. Below is a Transmission Electron Microscope ("TEM") image showing a cross section of a heterostructure of the LED chip from the LTPL-G35UV275GC-E.



21. The heterostructure in the TEM image shows a substrate and a nucleation layer located on the substrate, wherein the nucleation layer has a thickness of at least one nanometer and contains no large scale cavities, and a cavity containing layer, wherein the cavity containing layer is formed of a semiconductor material, and has a thickness greater than two monolayers.

22. As shown in the magnified TEM images below, a plurality of cavities are in the cavity containing layer, and wherein the plurality of cavities have a characteristic size of at least one nanometer and a characteristic separation of at least five nanometers.



23. Mouser's infringement has caused and is continuing to cause damage and irreparable injury to Plaintiff. Plaintiff will continue to suffer damage and irreparable injury unless and until that infringement is enjoined by this Court, as a remedy at law alone would be inadequate.

24. Plaintiff is entitled to injunctive relief and damages in accordance with 35 U.S.C. §§ 271, 281, 283, and 284.

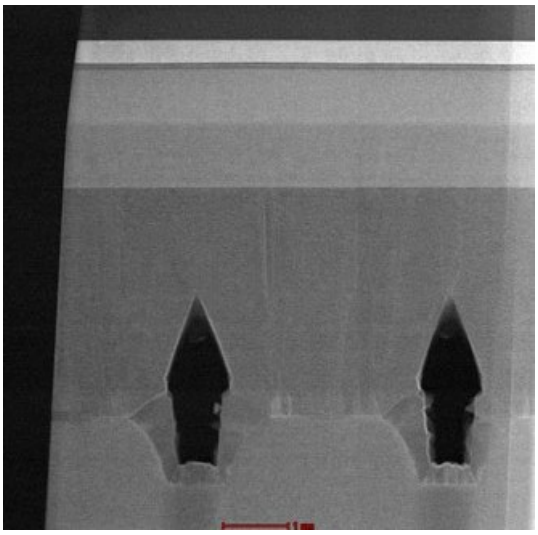
COUNT II

INFRINGEMENT OF THE '952 PATENT

EXAMPLE CLAIM 1

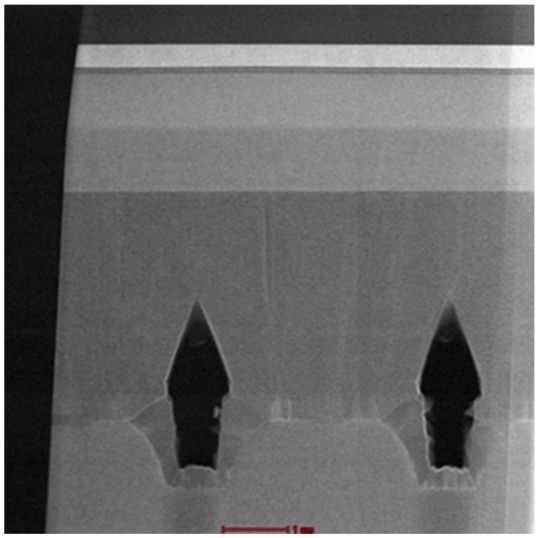
25. Mouser has infringed and continues to infringe one or more claims of the '952 Patent, including but not limited to exemplary claim 1, pursuant to 35 U.S.C. § 271(a), at least by without authority making, using, offering to sell, and/or selling the LTPL-G35UV275GC-E UV LED within the United States or importing the LTPL-G35UV275GC-E UV LED into the United States.

26. Below is a TEM image showing a cross section of a heterostructure of the LED chip from the LTPL-G35UV275GC-E.



27. The heterostructure in the TEM image shows a substrate and a nucleation layer located on the substrate. The nucleation layer is formed of a plurality of nucleation islands.

28. As shown in the magnified TEM images below, a cavity containing layer is formed of a semiconductor material, has a thickness greater than two monolayers, and a plurality of cavities are in the cavity containing layer. The plurality of cavities have a characteristic size of at least one nanometer and a characteristic separation of at least five nanometers.



29. Mouser's infringement has caused and is continuing to cause damage and irreparable injury to Plaintiff. Plaintiff will continue to suffer damage and

irreparable injury unless and until that infringement is enjoined by this Court, as a remedy at law alone would be inadequate.

30. Plaintiff is entitled to injunctive relief and damages in accordance with 35 U.S.C. §§ 271, 281, 283, and 284.

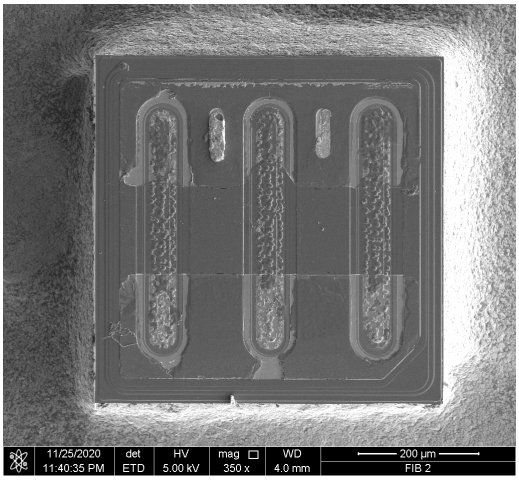
COUNT III

INFRINGEMENT OF THE ’562 PATENT

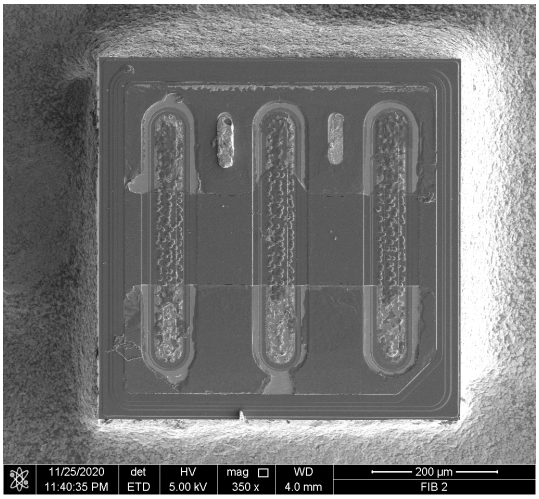
EXAMPLE CLAIM 1

31. Mouser has infringed and continues to infringe one or more claims of the ’562 Patent, including but not limited to exemplary claim 1, pursuant to 35 U.S.C. § 271(a), at least by without authority making, using, offering to sell, and/or selling the LTPL-G35UV275GC-E UV LED within the United States or importing the LTPL-G35UV275GC-E UV LED into the United States.

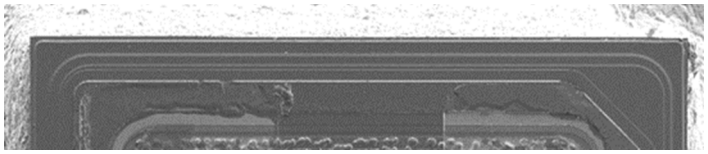
32. The LTPL-G35UV275GC-E UV LED includes a LED package, which includes a light emitting diode chip. A Scanning Electron Microscope (“SEM”) image of a chip from an LTPL-G35UV275GC-E UV LED is reproduced below.



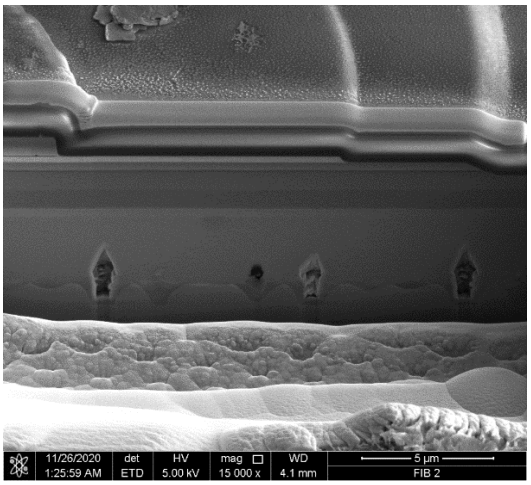
33. Two metallic contacts are deposited on the surface of the UV LED's semiconductor structure, as shown in the SEM image below. One of these contacts in the LTPL-G35UV275GC-E UV LED comprises at least two corners.



34. With respect to the semiconductor structure surface, these two corners have a substantially lateral direction along the surface of the semiconductor structure. Along this lateral direction, the contact corners have a profiled shape. Specifically, instead of forming a sharp corner where the edges of the contact meet, the corner has a rounded profiled shape that provides a gradual transition between the two edges, as shown in the magnified SEM image of one of the contact corners below.



35. The contact corners also have depth perpendicular to the semiconductor structure surface. Along this perpendicular direction, the corners have an edge with a profiled shape perpendicular to the semiconductor surface. The perpendicular profiled shape of the contact corners provides a non-planar transition from the semiconductor structure surface to the top surface of the contact, as shown in the Focused Ion Beam ("FIB")-SEM image below.



36. Defendant's infringement has caused and is continuing to cause damage and irreparable injury to SETi. SETi will continue to suffer damage and irreparable injury unless and until that infringement is enjoined by this Court, as a remedy at law alone would be inadequate.

37. SETi is entitled to injunctive relief and damages in accordance with 35 U.S.C. §§ 271, 281, 283, and 284.

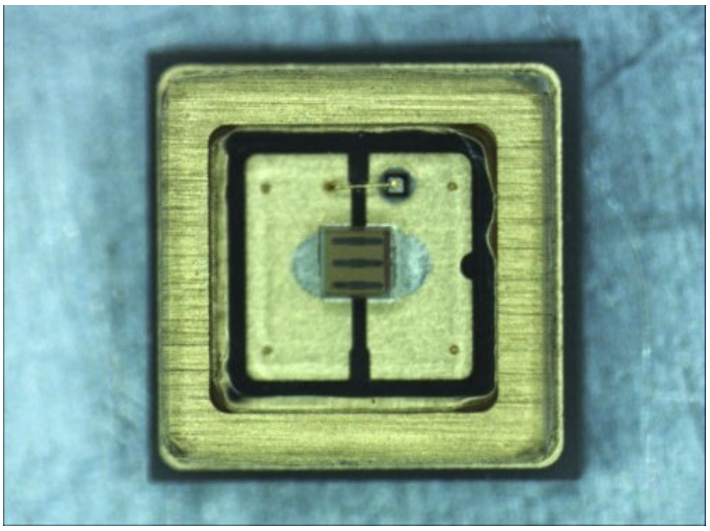
COUNT IV

INFRINGEMENT OF THE '848 PATENT

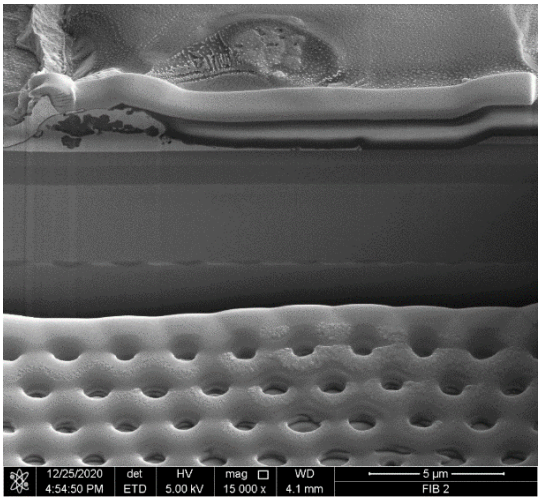
EXAMPLE CLAIM 1

38. Mouser has infringed and continues to infringe one or more claims of the '848 Patent, including but not limited to exemplary claim 1, pursuant to 35 U.S.C. § 271(a), at least by without authority making, using, offering to sell, and/or selling the LTPL-G35UV275GC-E UV LED within the United States or importing the LTPL-G35UV275GC-E UV LED into the United States.

39. The LTPL-G35UV275GC-E UV LED includes an optoelectronic device. An optical microscope image of the top of the optoelectronic device from an LTPL-G35UV275GC-E UV LED is reproduced below.



40. Below is a SEM image taken after a hole was milled into the LED chip using a FIB.



41. The composite image above shows an n-type semiconductor layer having a surface, and a mesa located over a first portion of the surface of the n-type semiconductor layer, a first n-type metallic contact layer located over at least a portion of the n-type contact region in proximity of the mesa boundary and a second n-type metallic contact layer located over a second portion of the n-type contact region. The n-type contact region is at least partially defined by the mesa boundary. The first n-type metallic contact layer forms an ohmic contact with the n-type semiconductor layer.

42. The above FIB-SEM image shows a second n-type metallic contact layer located over a second portion of the n-type contact region, and it is formed of a reflective metallic material distinct from a metallic material used to form the first n-type metallic contact layer.

43. Mouser's infringement has caused and is continuing to cause damage and irreparable injury to Plaintiff. Plaintiff will continue to suffer damage and irreparable injury unless and until that infringement is enjoined by this Court, as a remedy at law alone would be inadequate.

44. Plaintiff is entitled to injunctive relief and damages in accordance with 35 U.S.C. §§ 271, 281, 283, and 284.

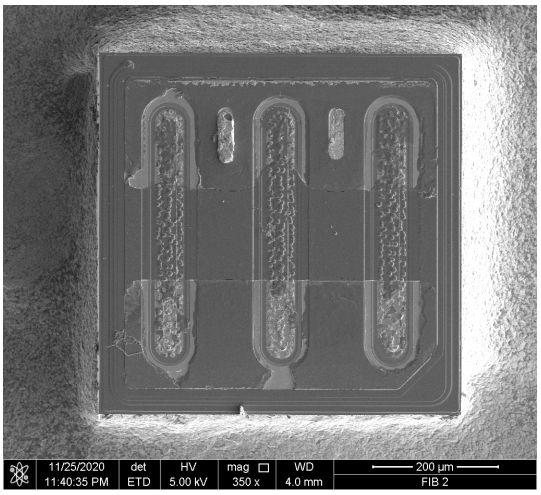
COUNT V

INFRINGEMENT OF THE '785 PATENT

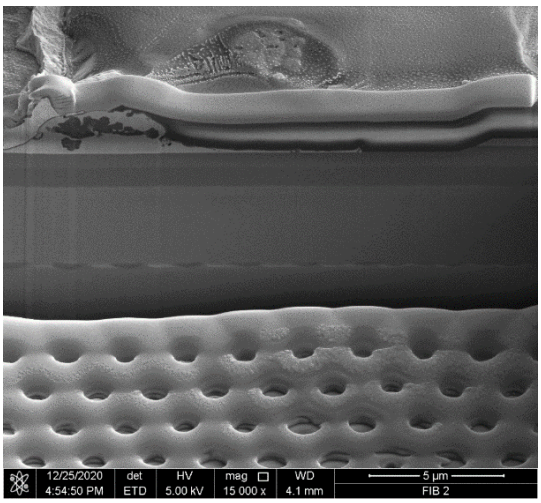
EXAMPLE CLAIM 1

45. Mouser has infringed and continues to infringe one or more claims of the '785 Patent, including but not limited to exemplary claim 1, pursuant to 35 U.S.C. § 271(a) at least by without authority making, using, offering to sell, and/or selling the LTPL-G35UV275GC-E UV LED within the United States or importing the LTPL-G35UV275GC-E UV LED into the United States.

46. The LTPL-G35UV275GC-E UV LED includes an optoelectronic device. A SEM image of a chip from an LTPL-G35UV275GC-E UV LED is reproduced below.



47. Below is a SEM image taken after a hole was milled into the LED chip using a FIB.



48. The composite image above shows an n-type semiconductor layer having a surface, and a mesa located over a first portion of the surface of the n-type semiconductor layer, a first n-type metallic contact layer located over at least a portion of the n-type contact region in proximity of the mesa boundary and a second n-type metallic contact layer located over a second portion of the n-type contact region. The n-type contact region is at least partially defined by the mesa boundary. The first n-type metallic contact layer forms an ohmic contact with the n-type semiconductor layer.

49. The above FIB-SEM image shows a second n-type metallic contact layer located over a second portion of the n-type contact region, and it is formed of a reflective metallic material distinct from a metallic material used to form the first n-type metallic contact layer, and at least one-scattering element is arranged in the n-type semiconductor layer.

50. Mouser's infringement has caused and is continuing to cause damage and irreparable injury to Plaintiff. Plaintiff will continue to suffer damage and irreparable injury unless and until that infringement is enjoined by this Court, as a remedy at law alone would be inadequate.

51. Plaintiff is entitled to injunctive relief and damages in accordance with 35 U.S.C. §§ 271, 281, 283, and 284.

COUNT VI

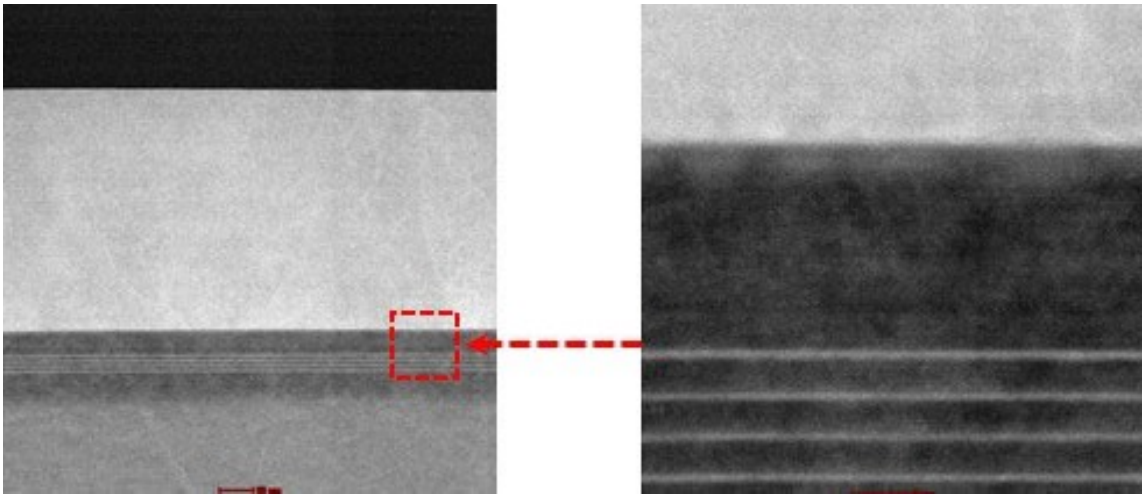
INFRINGEMENT OF THE '496 PATENT

EXAMPLE CLAIM 1

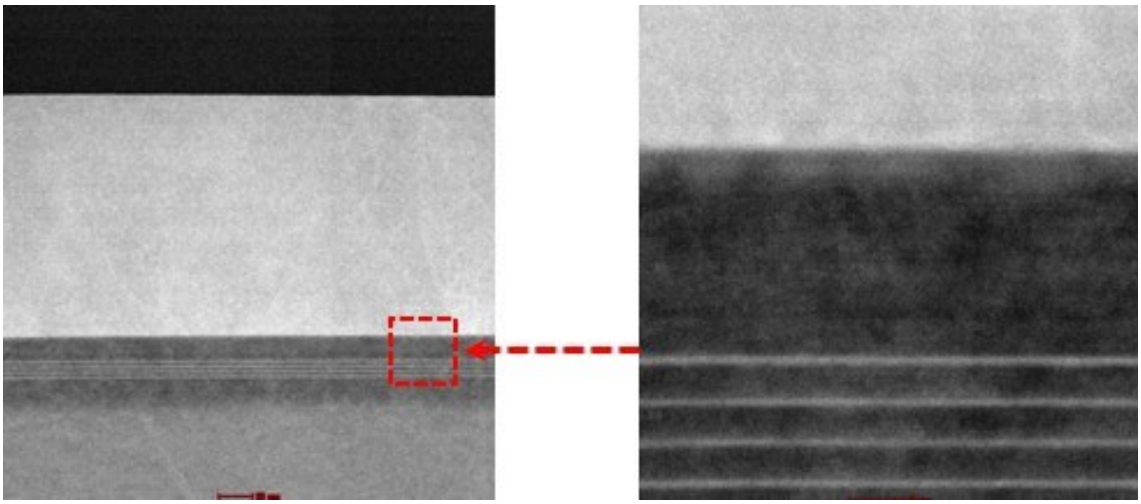
52. Mouser has infringed and continues to infringe one or more claims of the '496 Patent, including but not limited to claim 1, pursuant to 35 U.S.C. § 271(a) at least by without authority making, using, offering to sell, and/or selling the LTPL-G35UV275GC-E UV LED within the United States or importing the LTPL-G35UV275GC-E UV LED into the United States.

53. The LTPL-G35UV275GC-E infringes each element of exemplary claim 1 of the '496 patent. The LTPL-G35UV275GC-E includes a UV LED chip, which contains a semiconductor heterostructure comprised of different layers. The TEM image below left shows a cross section of a UV LED chip from the LTPL-G35UV275GC-E. The stacked layers of the semiconductor heterostructure have different shades depending on their material composition. The heterostructure in the TEM image shows (1) a UV-transparent sapphire substrate as the bottom, base layer, (2) a buffer layer adjacent to the substrate, (3) a light generating structure (an active layer) near the top of the heterostructure having top and bottom sides (in the magnified TEM image), (4) an n-type contact semiconductor layer located on the

bottom side of the active layer between the active layer and the buffer layer, and (5) a p-type contact semiconductor layer located on the top side of the active layer (in the magnified TEM image).



54. As shown in the magnified TEM images below, the p-type contact semiconductor layer also includes an embedded partially relaxed sublayer, which is darker because of the increased aluminum content. Below that sublayer, the p-type contact semiconductor layer includes a dislocation blocking structure above the active layer consisting of a lattice of alternating sublayers. The TEM image below right also shows that the dislocation blocking structure includes a graded composition that changes from the relatively light top side of the structure to the relatively dark bottom side.



55. Mouser's infringement has caused and is continuing to cause damage

and irreparable injury to Plaintiff. Plaintiff will continue to suffer damage and irreparable injury unless and until that infringement is enjoined by this Court, as a remedy at law alone would be inadequate.

56. Plaintiff is entitled to injunctive relief and damages in accordance with 35 U.S.C. §§ 271, 281, 283, and 284.

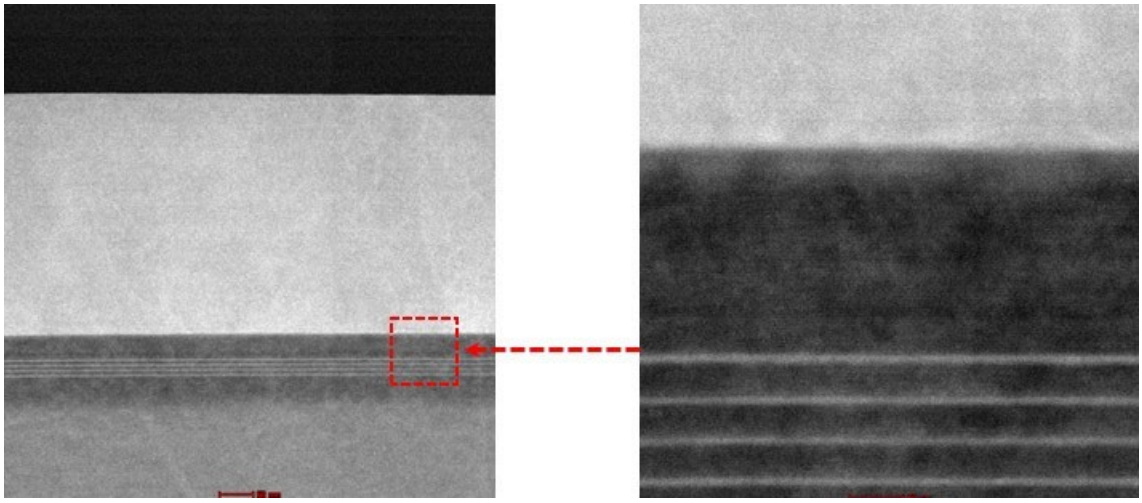
COUNT VII

INFRINGEMENT OF THE '420 PATENT

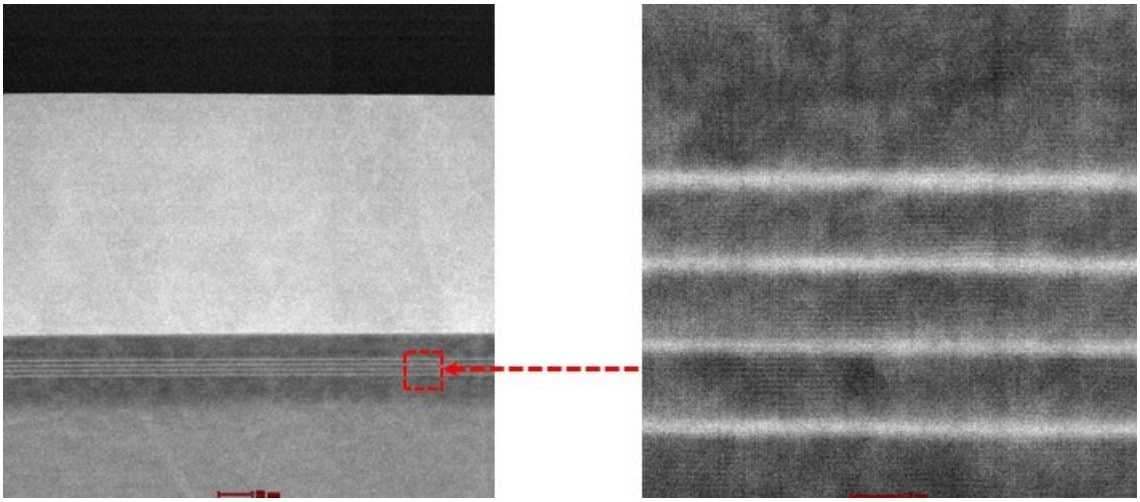
EXAMPLE CLAIM 1

57. Mouser has infringed and continues to infringe one or more claims of the '420 Patent, including but not limited to exemplary claim 1, pursuant to 35 U.S.C. § 271(a) at least by without authority making, using, offering to sell, and/or selling the LTPL-G35UV275GC-E UV LED within the United States or importing the LTPL-G35UV275GC-E UV LED into the United States.

58. The LTPL-G35UV275GC-E infringes each element of exemplary claim 1 of the '420 patent. The LTPL-G35UV275GC-E includes a UV LED chip that acts as an optoelectronic device. As shown in the TEM image below, the LTPL-G35UV275GC-E UV LED chip has an active layer which acts as a Short Period Superlattice ("SPSL") semiconductor layer.



59. The SPSL comprises barriers that are predominantly aluminum gallium nitride. The barriers' material composition varies laterally across the plane of the barriers, as shown in the TEM images below. The darker regions of the barriers represent a relatively high aluminum concentration; the lighter regions, a relatively low aluminum concentration. Thus, lateral inhomogeneities in the composition of the barriers forms the barriers' different regions.



60. The barriers' darker, high-aluminum regions necessarily have a characteristic band gap (i.e., a "first characteristic band gap") that differs from the characteristic band gap of the lighter, low-aluminum regions (i.e., a "second characteristic band gap"). The high aluminum regions are more transparent to the UV-C light generated by the LTPL-G35UV275GC-E UV LED chip than the low-aluminum regions. Thus, the high-aluminum regions form a set of transparent regions in the barriers. These transparent regions are at least ten percent of the area of the lateral cross section of at least one of the SPSL barriers.

61. The barriers' low-aluminum regions are more conductive to current flow than the high-aluminum regions. Thus, the low-aluminum regions form a set of conductive regions in the barriers. These conductive regions are at least two percent of the area of the lateral cross section of at least one of the SPSL barriers.

62. Mouser's infringement has caused and is continuing to cause damage and irreparable injury to Plaintiff. Plaintiff will continue to suffer damage and irreparable injury unless and until that infringement is enjoined by this Court, as a remedy at law alone would be inadequate.

63. Plaintiff is entitled to injunctive relief and damages in accordance with 35 U.S.C. §§ 271, 281, 283, and 284.

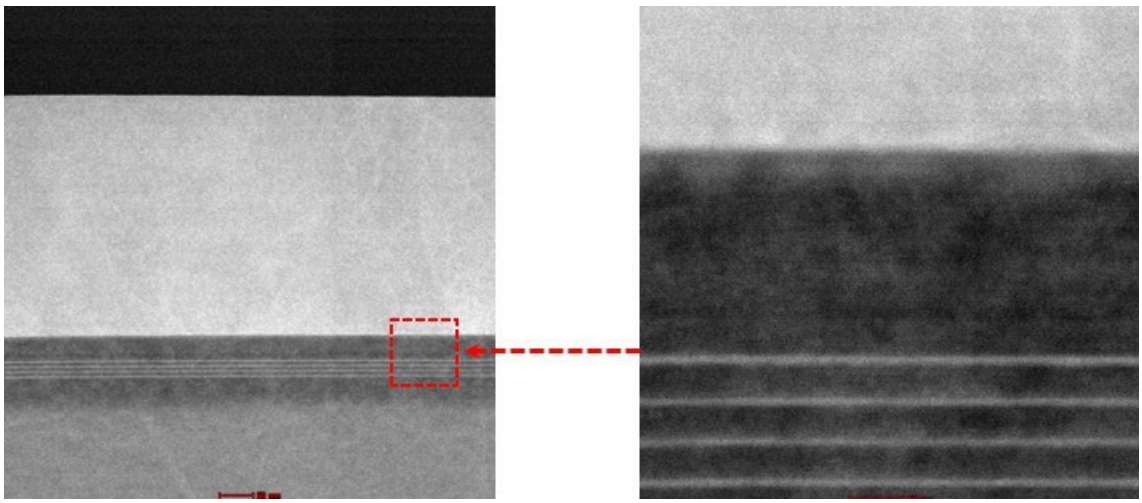
COUNT VIII

INFRINGEMENT OF THE '156 PATENT

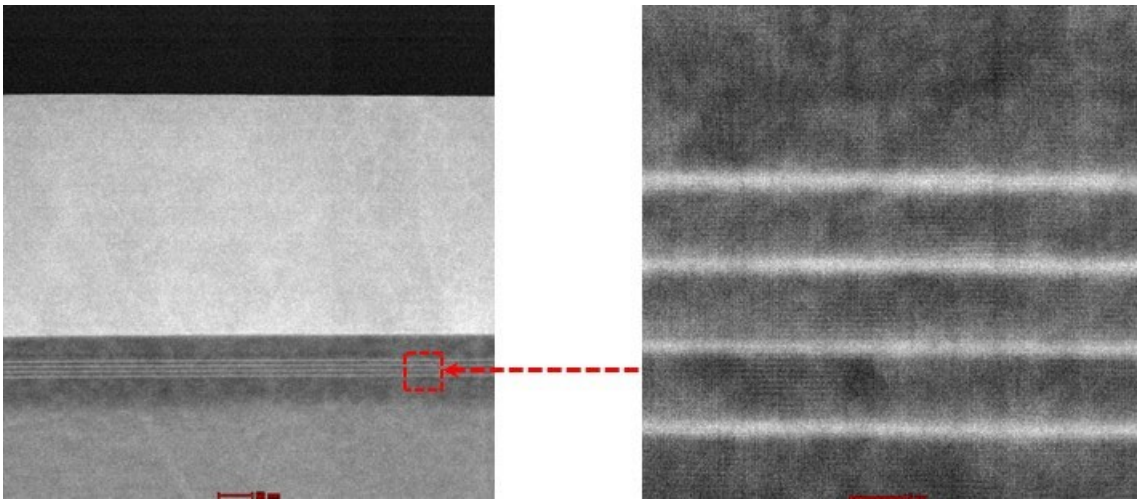
EXAMPLE CLAIM 1

64. Mouser has infringed and continues to infringe one or more claims of the '156 Patent, including but not limited to exemplary claim 1, pursuant to 35 U.S.C. § 271(a) at least by without authority making, using, offering to sell, and/or selling the LTPL-G35UV275GC-E UV LED within the United States or importing the LTPL-G35UV275GC-E UV LED into the United States.

65. The LTPL-G35UV275GC-E infringes each element of exemplary claim 1 of the '420 patent. The LTPL-G35UV275GC-E includes a UV LED chip that acts as a device. As shown in the TEM image below, the LTPL-G35UV275GC-E UV LED chip has a set of group III nitride layers.



66. The TEM image shows an active layer, which comprises barriers that are predominantly aluminum gallium nitride. The barriers' material composition varies laterally across the plane of the barriers, as shown in the TEM images below. The darker regions of the barriers represent a relatively high aluminum concentration; the lighter regions, a relatively low aluminum concentration. Thus, lateral inhomogeneities in the composition of the barriers forms the barriers' different regions.



67. The barriers' darker, high-aluminum regions necessarily have a characteristic band gap (i.e., a "first characteristic band gap") that differs from the characteristic band gap of the lighter, low-aluminum regions (i.e., a "second characteristic band gap"). The high aluminum regions are more transparent to the UV-C light generated by the LTPL-G35UV275GC-E UV LED chip than the low-aluminum regions. Thus, the high-aluminum regions form a set of transparent regions in the barriers. These transparent regions are at least ten percent of the area of the lateral cross section of at least one of the barriers.

68. The barriers' low-aluminum regions are more conductive to current flow than the high-aluminum regions. Thus, the low-aluminum regions form a set of conductive regions in the barriers. These conductive regions are at least two percent of the area of the lateral cross section of at least one of the barriers.

69. An aluminum nitride molar fraction in the set of transparent regions in at least one of the barriers is higher than an aluminum nitride molar fraction in the set of conductive regions therein.

70. Plaintiff is entitled to injunctive relief and damages in accordance with 35 U.S.C. §§ 271, 281, 283, and 284.

71. Mouser's infringement has caused and is continuing to cause damage and irreparable injury to Plaintiff. Plaintiff will continue to suffer damage and irreparable injury unless and until that infringement is enjoined by this Court, as a remedy at law alone would be inadequate.

72. Plaintiff is entitled to injunctive relief and damages in accordance with 35 U.S.C. §§ 271, 281, 283, and 284.

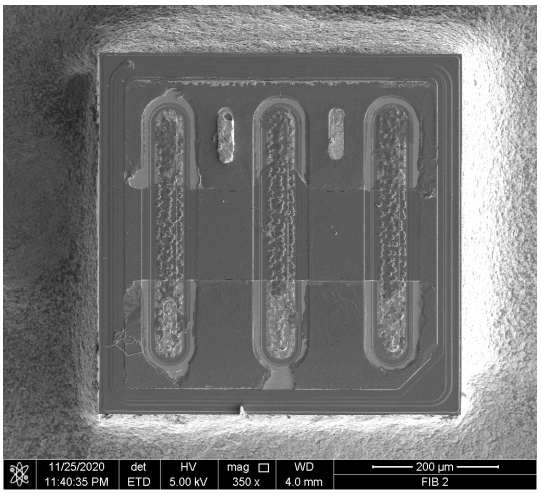
COUNT IX

INFRINGEMENT OF THE '117 PATENT

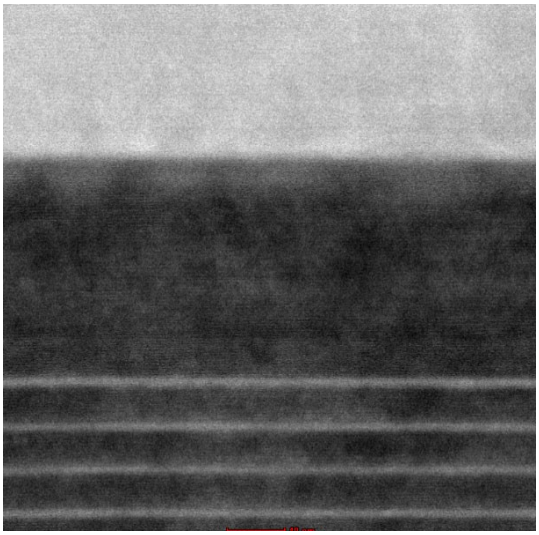
EXAMPLE CLAIM 1

73. Mouser has infringed and continues to infringe one or more claims of the '117 Patent, including but not limited to exemplary claim 1, pursuant to 35 U.S.C. § 271(a), at least by without authority making, using, offering to sell, and/or selling the LTPL-G35UV275GC-E UV LED within the United States or importing the LTPL-G35UV275GC-E UV LED into the United States.

74. The LTPL-G35UV275GC-E UV LED includes a light emitting diode. A scanning electron microscope image of a chip from an LTPL-G35UV275GC-E UV LED is reproduced below. The image shows a metallic contact.



75. A TEM image depicting the cross section of the epitaxial layers of the LED chip from the LTPL-G35UV275GC-E UV LED shows a semiconductor heterostructure.



76. As shown in the magnified TEM images above, the semiconductor heterostructure includes an active region, and a group III nitride semiconductor layer located between the active region, and the semiconductor layer including a plurality of inhomogeneous regions.

77. The TEM image above shows a first and second level of the semiconductor layer. The darker, high-aluminum regions has a plurality of inhomogeneous regions arranged within multiple levels of the semiconductor layer

along a height direction of the semiconductor layer, The high-aluminum regions form a set of transparent regions.

78. As shown in the TEM image above, some of the inhomogeneous regions in a first level of the semiconductor layer are vertically offset from inhomogeneous regions in a second level of the semiconductor layer. Each of the inhomogeneous regions having a set of attributes differing from a group III nitride material forming the semiconductor layer.

79. Mouser's infringement has caused and is continuing to cause damage and irreparable injury to Plaintiff. Plaintiff will continue to suffer damage and irreparable injury unless and until that infringement is enjoined by this Court, as a remedy at law alone would be inadequate.

80. Plaintiff is entitled to injunctive relief and damages in accordance with 35 U.S.C. §§ 271, 281, 283, and 284.

WILLFULNESS

81. Mouser became aware of the existence of the '952 Patent, '562 Patent, '496 Patent, '420 Patent, and '156 Patent no later than on or about December 17, 2020, when those patents and Mouser's infringement were identified by letter to Mouser's CEO Glenn Smith.

82. Upon information and belief, since receiving notice, Mouser has continued to perform acts of infringement including selling and offering for sale infringing products. Upon information and belief, the continuing infringement has been performed with knowledge and intent.

83. For at least the foregoing reasons, Plaintiff is entitled to enhancement of damages up to three times its actual damages amount, in accordance with 35 U.S.C. § 284.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests that this Court enter judgment in its favor and against Mouser as follows:

A. A declaration that Mouser has infringed the '906 Patent, '952 Patent, '562 Patent, '848 Patent, '785 Patent, '496 Patent, '420 Patent, '156 Patent, and '117 Patent under 35 U.S.C. § 271, and a final judgment incorporating the same;

B. A permanent injunction, enjoining Mouser and its officers, agents, servants, employees, representatives, successors, and assigns, and all others acting in concert or participation with them from continued infringement under 35 U.S.C. § 271 of the '906 Patent, '952 Patent, '562 Patent, '848 Patent, '785 Patent, '496 Patent, '420 Patent, '156 Patent, and '117 Patent;

C. An award of damages adequate to compensate Plaintiff for Mouser's infringement the '906 Patent, '952 Patent, '562 Patent, '848 Patent, '785 Patent, '496 Patent, '420 Patent, '156 Patent, and '117 Patent, together with prejudgment and post-judgment interest and costs pursuant to 35 U.S.C. § 284;

D. Enhancement of damages for Mouser's infringement of at least the '952 Patent, '562 Patent, '496 Patent, '420 Patent, and '156 Patent up to treble the amount of actual damages pursuant to 35 U.S.C. § 284;

E. An accounting of all infringing sales and other infringing acts by Mouser, and an order compelling an accounting for infringing acts not presented at trial and an award by the Court of additional damages for such acts; and

F. Any other relief to which Plaintiff is entitled or that the Court seems just and proper.

JURY DEMAND

Pursuant to Rule 38(b) of the Federal Rules of Civil Procedure, Plaintiff hereby demands trial by jury of all issues so triable.

DATED: May 25, 2021

Respectfully submitted,

STEPTOE & JOHNSON LLP

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