

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

MICROCHIP TECHNOLOGY INC.,)	
)	
Plaintiff,)	
)	
v.)	C.A. No. 23-778 (JDW)
)	
APTIV SERVICES US, LLC,)	JURY TRIAL DEMANDED
)	
Defendant.)	

COMPLAINT FOR PATENT INFRINGEMENT

Microchip Technology Inc. (“Microchip”) hereby submits the following Complaint against Aptiv Services US, LLC (“Aptiv Services”), and in support thereof, alleges the following:

NATURE OF THE ACTION

1. Microchip brings this action for infringement of U.S. Patent Nos. 8,041,874 (the “’874 Patent”) (Ex. 1); 7,564,665 (the “’665 Patent”) (Ex. 2); and 9,471,074 (the “’074 Patent”) (Ex. 3) (collectively, the “Asserted Patents”) under the Patent Laws of the United States of America, 35 U.S.C. § 100, *et seq.*

THE PARTIES

2. Microchip is a Delaware corporation with a place of business located at 2355 West Chandler Blvd., Chandler, Arizona 85224-6199. Microchip is the owner of the Asserted Patents.

3. Upon information and belief, Aptiv Services is a Delaware limited liability company with its principal place of business at 5725 Delphi Dr., Troy, Michigan 48098. Upon information and belief, Aptiv Services wholly or partially directs or controls the making, using, selling, offering to sell, and/or importing of the Dual Role Hub.

JURISDICTION AND VENUE

4. This Court has exclusive subject matter jurisdiction over this action pursuant to federal question jurisdiction, 28 U.S.C. §§ 1331 and 1338(a), and the Patent Laws of the United States, 35 U.S.C. § 1, *et seq.*

5. The Court has personal jurisdiction over Aptiv Services because it is a Delaware limited liability company; has continuous and systematic contacts with the State of Delaware, including continuous contacts with, and sales to, customers in Delaware; and has committed acts within Delaware giving rise to this action, directly and through subsidiaries or intermediaries, including distributing, offering for sale, selling, using, importing and/or advertising products and services that infringe the claims of the Asserted Patents in Delaware. Further, Aptiv Services submitted to the personal jurisdiction of this Court in Microchip’s prior litigation against Aptiv Services (*Microchip Technology Inc. v. Aptiv Services US, LLC*, Case No. 17-cv-01194-JDW (D. Del.) (the “2017 Action”)).

6. Venue is proper in this District pursuant to 28 U.S.C. §§ 1391(b)-(c) and 1400(b) because, *inter alia*, Aptiv Services resides in this district by virtue of being formed and organized in Delaware.

FACTUAL BACKGROUND

A. Microchip

7. Microchip is a leading provider of smart, connected, and secure embedded control solutions. Founded in 1987, it has never ceased innovating. With over 30 years of technology leadership, Microchip’s broad product portfolio provides a large portion of the silicon requirements in customers’ applications. In key end markets, such as automotive, aerospace and defense, communications, consumer appliances, data centers, and computing, Microchip’s synergistic product portfolio empowers disruptive growth trends, including 5G, data centers,

artificial intelligence and machine learning, Internet of Things and edge computing, advanced driver-assist systems and autonomous driving, and electric vehicles.

8. Among many products for the automotive industry, Microchip provides USB media hubs for automotive infotainment systems. An automotive infotainment system provides compatibility with personal consumer electronics devices that may be used in vehicles. It also provides drivers with relevant information for safe operation and navigation. Microchip empowers the design and development of infotainment systems that provide intuitive visual, auditory, and tactile interfaces to the vehicle's distributed and networked subsystems.

9. A media hub provides an interface from the vehicle's infotainment system to personal electronic devices such as smartphones and tablets. In addition to providing a data link, the media hub also supplies power to charge the batteries used in these devices. Within Microchip's media hub, its USB Hub Controllers provide port expansion solutions for mixed-speed USB applications. They feature ultra-low power consumption and a small footprint.

10. Microchip's leadership position in USB media hubs comes from its early involvement with car makers to develop solutions and product roadmaps. Microchip's extensive knowledge of both the consumer and automotive markets allows it to understand trends that enable it to develop products with differentiated features.

B. Microchip's Innovations

11. Microchip's USB products are known for their versatility, simplicity, and convenience. For example, Microchip's compact USB to Ethernet Hub products merge the flexibility provided by USB-based and Ethernet-based networks. They feature fully-integrated high-speed USB 2.0 hubs and ethernet controllers, providing a high-performance and cost-

effective USB to Ethernet connectivity solution. Microchip disclosed and claimed the USB to Ethernet Hub in the '874 Patent, titled "USB and Ethernet Controller Combination Device."

12. As further detailed below, Aptiv Services' Dual Role Hub infringes at least claim 25 of the '874 Patent.

13. Further, Microchip invented a robust structure to overcome electrostatic discharge ("ESD") issues in, among other things, USB products. In particular, USB products contain integrated circuits that, in recent years, are increasingly designed to have a higher density of internal components and lower operating power supply voltage levels. As a result, integrated circuits are becoming more sensitive to the effects of ESD. ESD often originates from build-up of static charge near the integrated circuit or on a human handling it, leading to high current discharge for a short duration that may disable the integrated circuits. ESD thus poses a serious problem for USB hubs.

14. Microchip's innovative structure includes electrical pads (*e.g.*, digital I/O pads) that can absorb the energy of an ESD event and reduce the peak voltage experienced by the integrated circuit in a USB hub. Microchip disclosed and claimed this invention in the '665 Patent, titled "Pad ESD Spreading Technique."

15. As further detailed below, Aptiv Services' Dual Role Hub product infringes at least claim 14 of the '665 Patent.

16. Microchip also supports its USB products with innovative power management solutions. Power management is vital in USB devices that require efficient power consumption and precision. One such power management tool is a linear low-dropout voltage regulator. In simple terms, voltage regulators provide a stable output voltage independent of load, input-voltage

variations, temperature, and time. “Low-dropout” voltage regulators can maintain such regulation even where the difference between supply voltage and load voltage is small.

17. Low-dropout voltage regulators often rely on feedback loops, including a large external “compensating” capacitor to stabilize the operation of the circuit. However, the operation of such circuits is further dependent on the equivalent series resistance (“ESR”) attributable to the compensating capacitor, which can vary significantly depending on the characteristics of the capacitor, manufacturing variances, and the topology of the circuit connecting the capacitor.

18. To address this issue, Microchip invented a low-dropout voltage regulator design that permits the use of significantly smaller compensating capacitors and allows for a wider range of ESR, increasing circuit board layout efficiency and allowing greater flexibility in the range of suitable compensating capacitors. Microchip disclosed and claimed this invention in the ’074 Patent, titled “USB Regulator with Current Buffer to Reduce Compensation Capacitor Size and Provide for Wide Range of ESR Values of External Capacitor.”

19. As further detailed below, Aptiv Services’ Dual Role Hub product infringes at least claim 1 of the ’074 Patent.

C. Aptiv Services’ Knowledge of the Asserted Patents

20. Upon information and belief, Aptiv Services routinely evaluates IP risks associated with launching products. For example, in or around 2012, Aptiv Services conducted a search for patents relating to USB hub technology as part of an effort to evaluate the “IP risk” associated with its initial launch of the Dual Role Hub. During that search, Aptiv Services specifically targeted patents belonging to Standard Microsystems Corporation (later acquired by Microchip) and reviewed those patents in detail. The ’665 and ’874 Patents were both Standard Microsystems

Corporation patents that involved USB hub technologies and that issued before 2012. Upon information and belief, Aptiv Services thus knew of the '665 and '874 Patents as early as 2012.

21. Since the initial release of the Dual Role Hub, Aptiv Services has launched new generations of the product and/or the Boston chip within it. Upon information and belief, Aptiv Services has continued to conduct patent searches and detailed reviews of patents in anticipation of the launch of those new generations. Such searches would have revealed Microchip's '074 Patent, which claims technology used in USB hubs and issued on October 18, 2016. Upon information and belief, Aptiv Services was aware of the '074 Patent since its issuance in 2016.

22. Further, Aptiv Technologies Limited ("Aptiv Technologies") filed a Complaint in the District of Delaware on March 20, 2023 (*Aptiv Technologies Limited v. Microchip Technology Inc.*, No. 1-23-cv-00307-JDW (D. Del.) (the "Related Action"), accusing Microchip of infringement. In the Related Action, Microchip filed its Answer and Counterclaims on May 11, 2023, including a counterclaim against Aptiv Services for infringement of the '074 Patent. Aptiv Services' counsel accepted service on May 12, 2023. Thus, at minimum, Aptiv Services has known of the '074 Patent since Microchip filed its Answer and Counterclaims on May 11, 2023.

23. During the June 8, 2023 scheduling conference for the Related Action, Microchip informed Aptiv Services that Microchip intended to assert the '665 and '874 Patents against Aptiv Services. Microchip filed its Amended Answer and Counterclaims on July 14, 2023, including counterclaims against Aptiv Services for infringement of the '665 and '874 Patents. Thus, at minimum, Aptiv Services has known of the '665 and '874 Patents since the June 8, 2023 scheduling conference in the Related Action, and no later than the July 14, 2023 filing of Microchip's Amended Counterclaims.

24. Upon information and belief, as a result of its detailed review of the Asserted Patents, Aptiv Services knew that its Dual Role Hub infringed the '665 and '874 Patents as early as 2012 and the '074 Patent as early as 2016—and at minimum no later than June 8, 2023.

FIRST CAUSE OF ACTION

(INFRINGEMENT BY APTIV SERVICES)

U.S. Patent No. 8,041,874

25. Microchip repeats and incorporates by reference Paragraphs 1 through 24 above as though fully set forth herein.

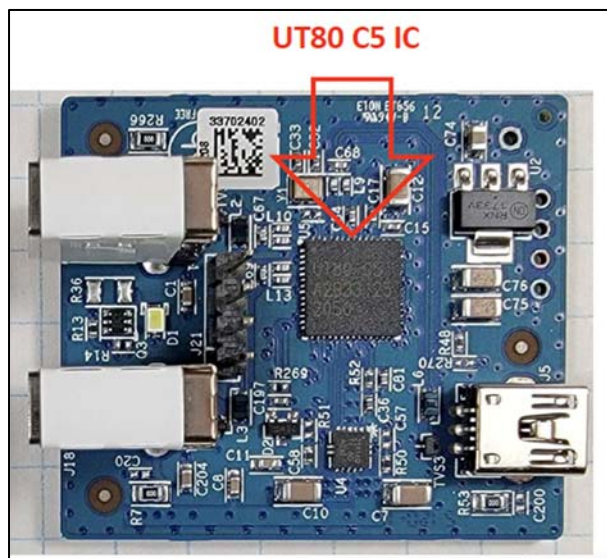
26. Aptiv Services has directly infringed and continues to directly infringe the '874 Patent at least by making, using, testing, offering to sell, selling, and/or importing into the United States products, such as Aptiv's Dual Role Hub, that contain Boston-2 chips, prototypes of the same, as well as earlier and later generations of the same (collectively, the "Accused Products"), or by directing or controlling others to make, use, test, offer to sell, sell, and/or import into the United States those products.

27. The Accused Products infringe at least claim 25 of the '874 Patent. For example, the Accused Products use an on-chip Ethernet controller permanently coupled to a USB hub circuit to facilitate bridging between two USB hosts (*e.g.*, a vehicle head unit and an iPhone). For at least the reasons detailed below—based on publicly available information, a teardown of the Boston-2 chip, and a USB traffic analysis performed on Aptiv's Dual Role Hub in a vehicle using a USB traffic analyzer—the Boston-2 chip practices each limitation of claim 25.

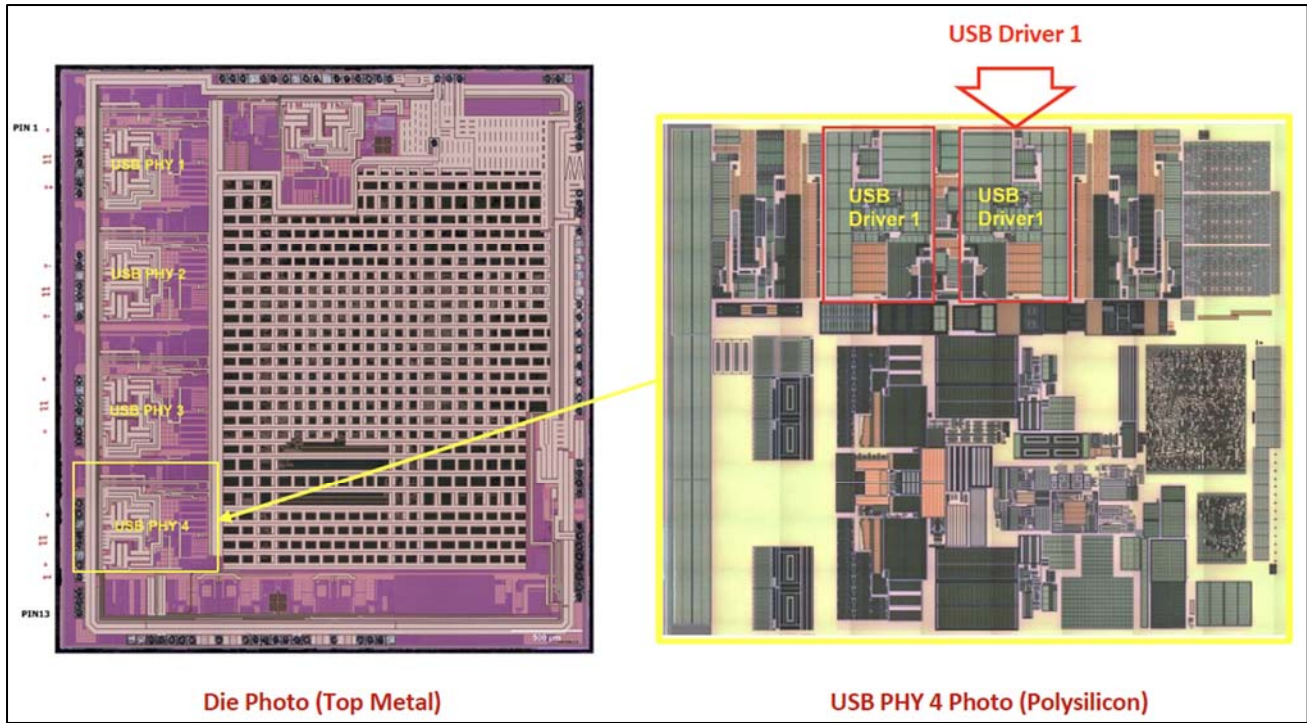
28. The Boston-2 chip is an "integrated circuit (IC)" because it is a chip.

29. The Boston-2 chip includes "a USB (Universal Serial Bus) hub circuit configured to transmit/receive the data to/from a host, and comprising an internal downstream port." As the below images of the Dual Role Hub (the overall board/package below) and Boston-2 chip ("UT80

C5 IC” below) demonstrate, the Boston-2 chip includes a USB hub with multiple downstream ports.



30. As shown in the below teardown images of the Boston-2 chip, the Boston-2 chip includes internal USB ports (USB PHY1 to PHY 4). Because a USB hub communicates between upstream and downstream ports, at least one of these ports is an internal downstream port.



31. The Boston-2 chip includes “an Ethernet controller circuit configured to transmit/receive data to/from a network.” Microchip’s USB traffic analyzer testing demonstrated that, to facilitate host-to-host communication with an iPhone, the Boston-2 chip routes at least certain communications from host-to-iPhone via a “Network Control Module” connected to a downstream USB port. The “Network Control Module” in turn transmits Ethernet data to/from a network that sits between the Network Control Module and the iPhone.

32. The Boston-2 chip includes “a digital interface configured to couple the USB hub circuit to the Ethernet controller circuit through the internal downstream port, and configured to manage data exchange between the USB hub and the Ethernet controller.” The Network Control Module circuit must be connected to the USB hub through a digital interface to facilitate communications. Thus, the digital interface must manage data exchange between the USB hub and the Ethernet controller for the two to communicate.

33. The Ethernet controller in the Boston-2 chip “appears to the host as a permanently attached device on the internal downstream port.” The Boston-2 chip does not include any detachable components. Thus, the Network Control Module circuit must be permanently attached on a downstream port of the hub, and must also appear to the host to be permanently attached on a downstream port of the hub.

34. Upon information and belief, Aptiv Services has known that the Accused Products infringe the ’874 Patent as early as 2012 through its detailed review of Microchip’s USB patent portfolio, and no later than the June 8, 2023 scheduling conference in the Related Action during which Microchip’s counsel stated that Microchip intended to assert claims for infringement of the ’874 Patent against the Dual Role Hub. At least since the date when Aptiv Services learned of the ’874 Patent, Aptiv Services’ infringement of the ’874 Patent has been willful and deliberate.

35. Aptiv Services also indirectly infringes the ’874 Patent. Aptiv Services has induced and continues to induce the infringement of the ’874 Patent by its customers, auto manufacturers, distributors, dealers, and/or infotainment system end users, knowing through its detailed review of Microchip’s USB patent portfolio that its actions would induce such infringement.

36. Aptiv Services actively encourages its customers, auto manufacturers, and/or end users to infringe claims of the ’874 Patent by providing the Accused Products, and advertising and advising its customers and auto manufacturers how to incorporate the Accused Products into an infotainment system and/or automobile in a manner that infringes the ’874 Patent.

37. On information and belief, Aptiv Services will continue to infringe and induce infringement of the ’874 Patent, unless enjoined by this Court.

38. As a result of Aptiv Services’ infringement of the ’874 Patent, Microchip has suffered and will continue to suffer damages in an amount to be proven at trial.

39. Microchip is entitled to recover damages for pre-suit infringement because it has complied with 35 U.S.C. § 287.

40. As a result of Aptiv Services' infringement of the '874 Patent, Microchip has suffered and will continue to suffer irreparable harm, unless Aptiv Services is enjoined against such acts by this Court.

41. As a result of at least Aptiv Services' willful infringement of the '874 Patent, Microchip is entitled to an award of its reasonable attorneys' fees, as provided by 35 U.S.C. § 285.

SECOND CAUSE OF ACTION

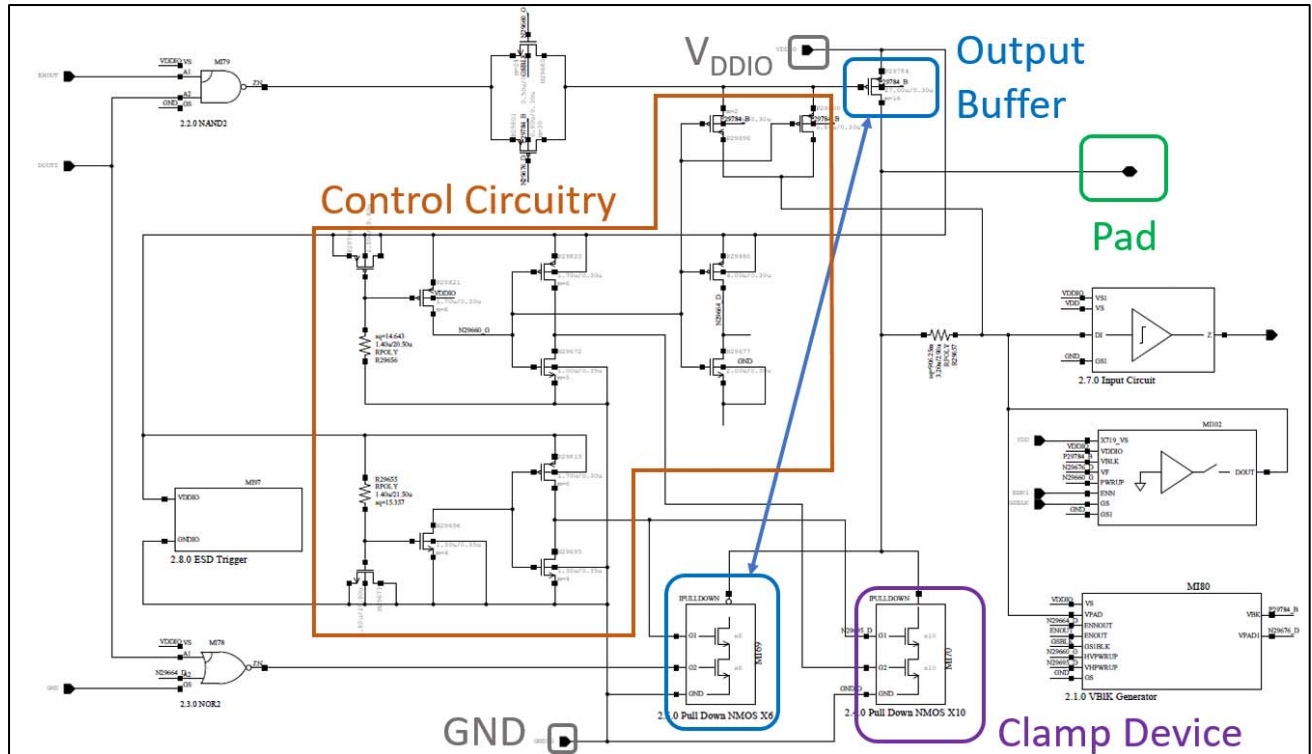
(INFRINGEMENT BY APTIV SERVICES)

U.S. Patent No. 7,564,665

42. Microchip repeats and incorporates by reference Paragraphs 1 through 41 above as though fully set forth herein.

43. Aptiv Services has directly infringed and continues to directly infringe the '665 Patent at least by making, using, testing, offering to sell, selling, and/or importing into the United States the Accused Products, or by directing or controlling others to make, use, test, offer to sell, sell, and/or import into the United States those products.

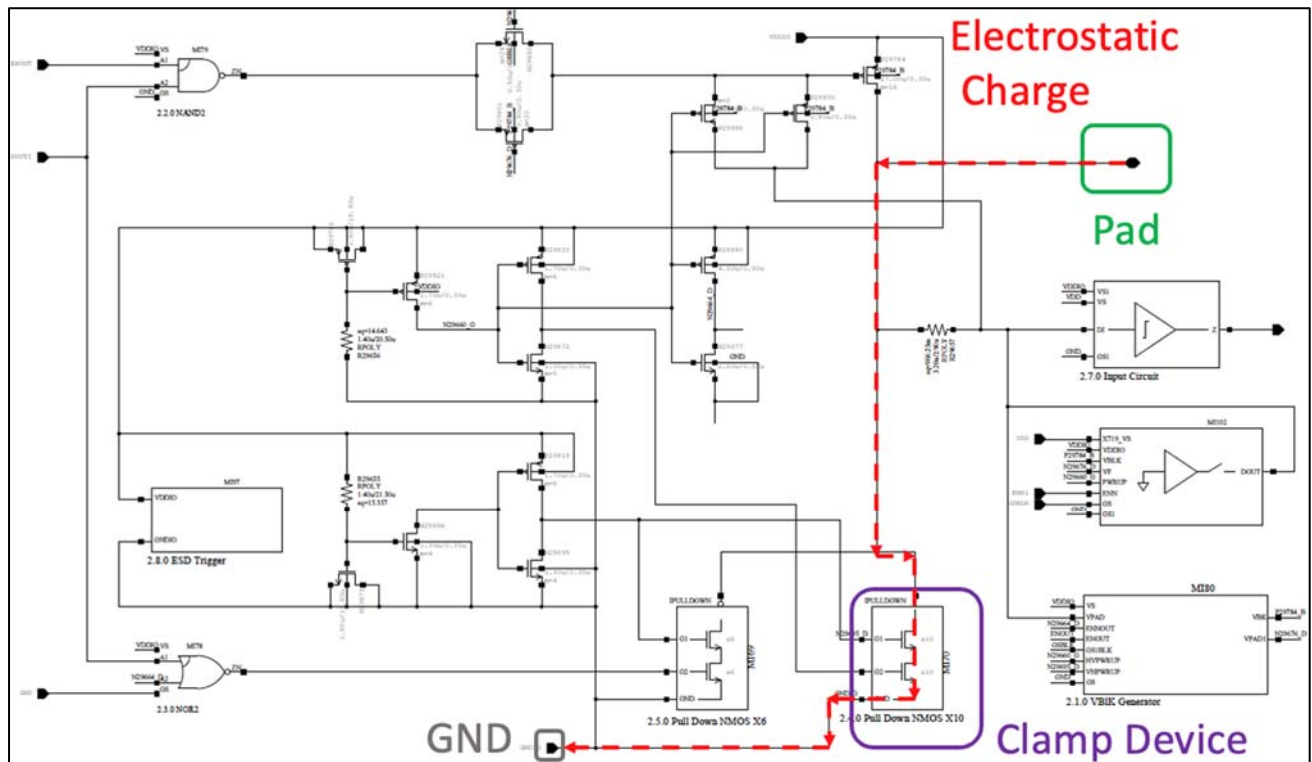
44. The Accused Products infringe at least claim 14 of the '665 Patent. For example, the following circuit schematics derived from a teardown of the Boston-2 chip demonstrate that the Boston-2 chip includes ESD protection circuitry. The Boston-2 chip contains multiple input/output pads, each of which is connected to an instance of the following circuitry. All instances of this circuitry are interconnected by a common V_{DDIO} and a common GND.



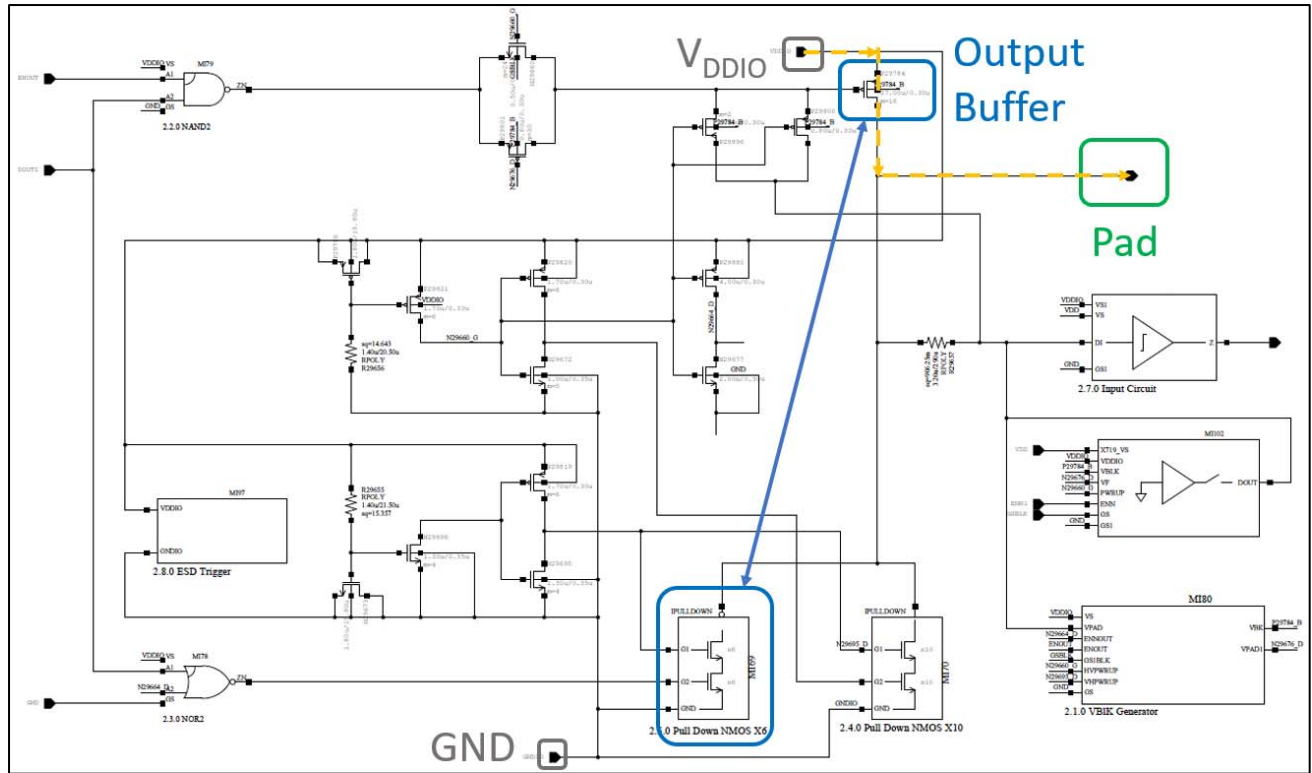
45. As demonstrated in the foregoing schematic, the ESD protection circuitry of the Boston-2 chip contains every element of at least claim 14 of the '665 Patent. The ESD protection circuitry of the Boston-2 chip contains “one or more pads” (the entire circuit above), “a respective physical pad having respective capacitance” (green above), “a respective clamp device” (purple above), “a respective pad circuit” (all elements above aside from the physical pad), “a respective output buffer” (blue above), and “respective control circuitry” (dark orange above).

46. The “respective clamp device” (purple below) is “configured to absorb, when turned on, a portion of an energy generated by an ESD event, to thereby further reduce the maximum voltage developed in the system as a result of the ESD event.” When the transistors comprising the clamp device are enabled, the clamp shorts the pad (green below) to GND, as shown below. This clamp device absorbs a portion of the energy generated by the ESD event on the pad by creating an electrical path from the pad to GND. Dissipation of the electrostatic charge

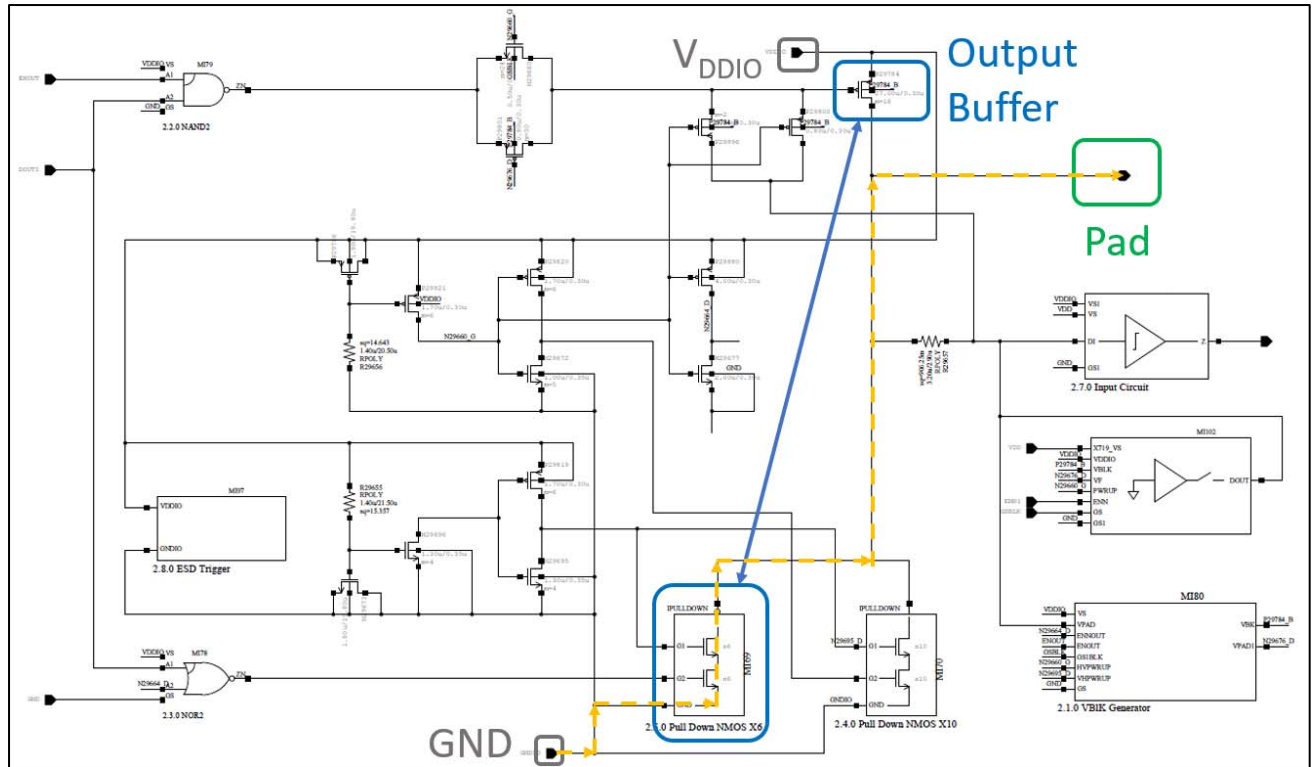
(dashed red line below) through this channel reduces the maximum voltage developed in the system by the ESD event.



47. The output buffer is “coupled to the respective physical pad, and operable to drive at least one respective output signal at the respective physical pad.” When the PMOS transistor of the output buffer (blue below) is enabled, the output buffer creates an electrical path (dashed yellow line below) from V_{DDIO} to the pad (green below), as depicted below.



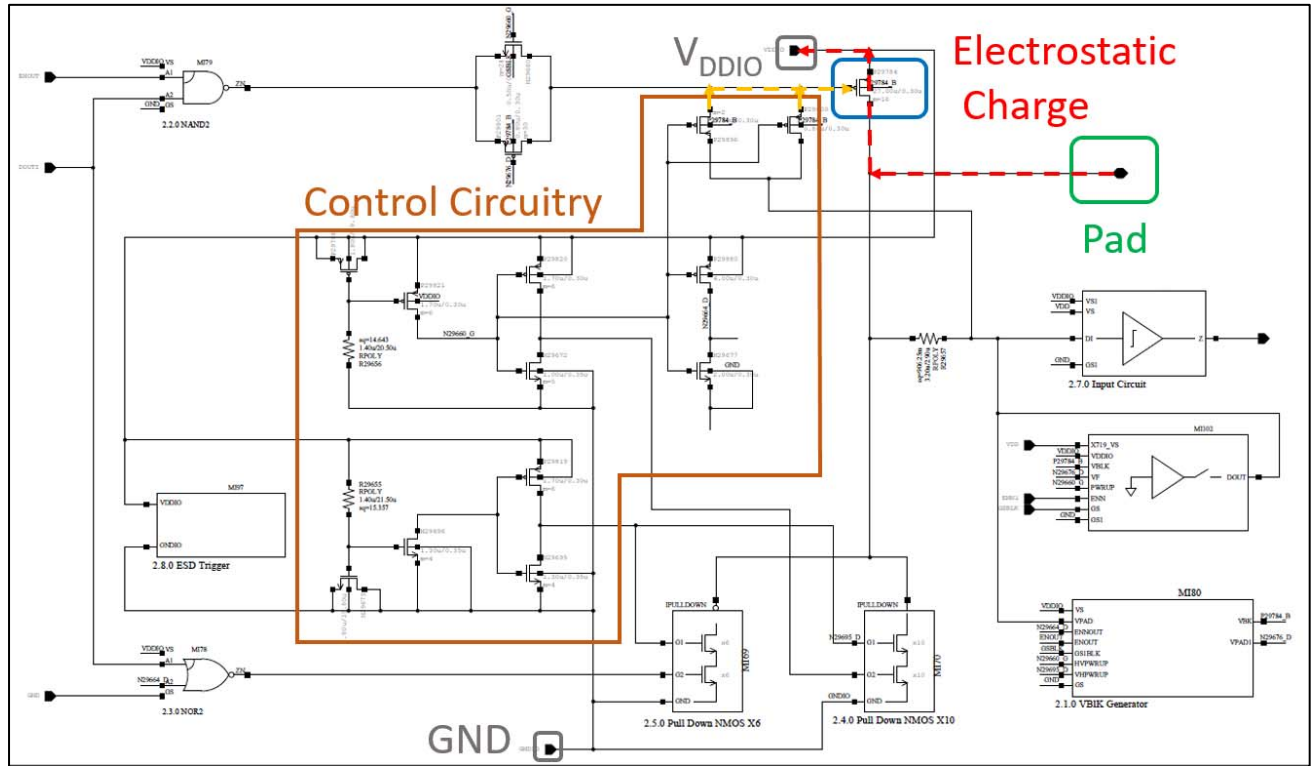
48. Similarly, when the two NMOS transistors of the output buffer (blue below) are enabled, the output buffer creates a path (dashed yellow line below) from GND to the pad (green below), as depicted below.



49. Thus, by selectively enabling either the PMOS transistors or the NMOS transistors, the output buffer drives at output signal at the pad.

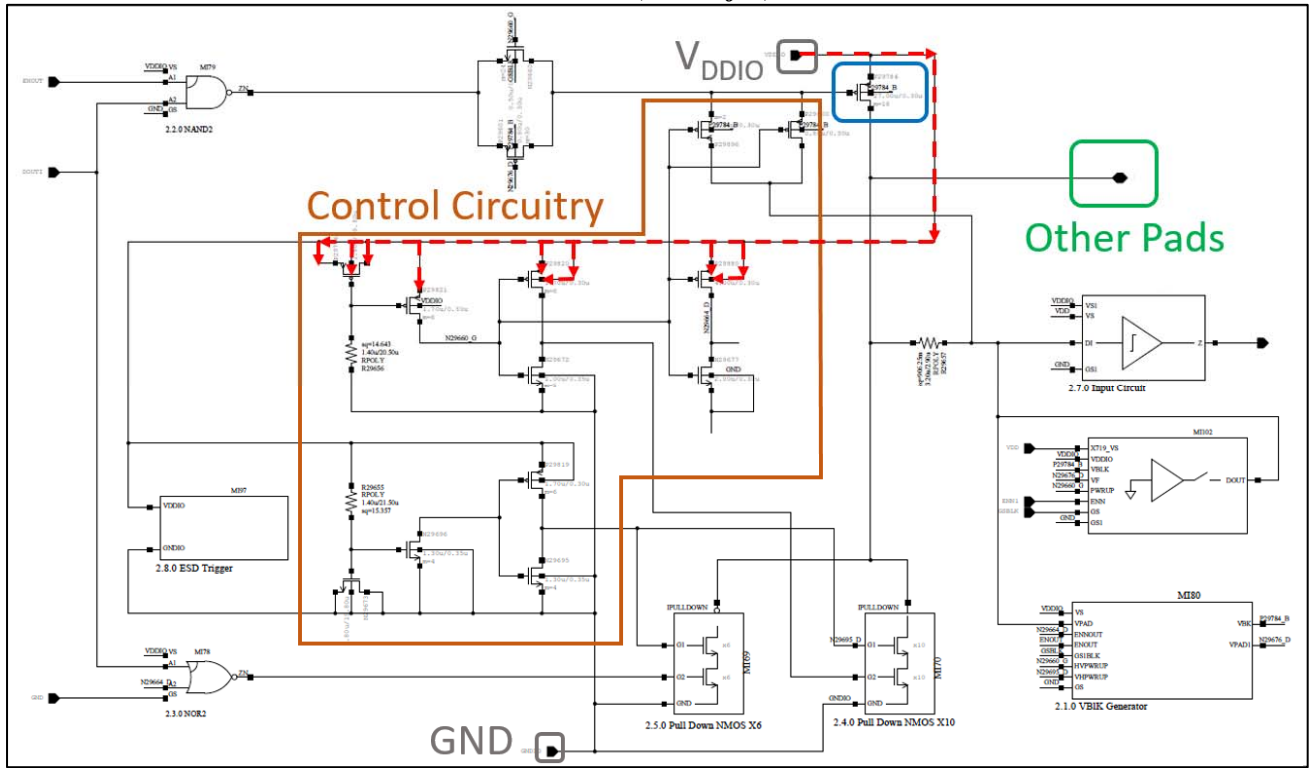
50. The control circuitry is operable to “activate at least a portion of the respective output buffer in response to an ESD event to charge the respective pad capacitance to reduce a maximum voltage developed in the system as a result of the ESD event.” During an ESD event, the control circuitry (dark orange below) activates the PMOS transistor of the output buffer (blue below), which in turn creates an electrical path (dashed red line below) between the pad (green below) and the V_{DDIO} line, which in turn is connected to additional instances of the ESD circuitry corresponding to other pads (dashed yellow line below).

Pad Where ESD Event Occurs



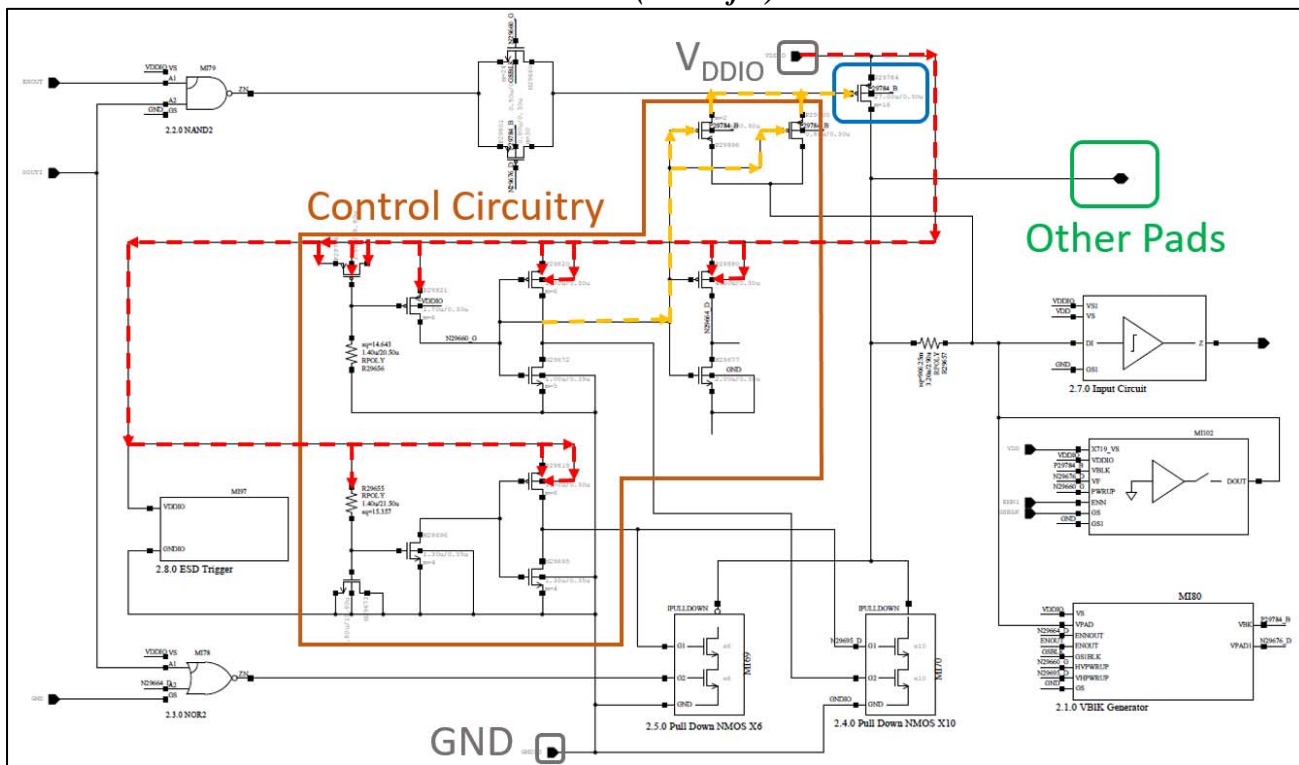
51. When the electrostatic charge arrives at the control circuitry for the other pads, it activates (dashed red line below) their control circuitry (dark orange below), as depicted below.

Other Pads (Pt. 1 of 3)



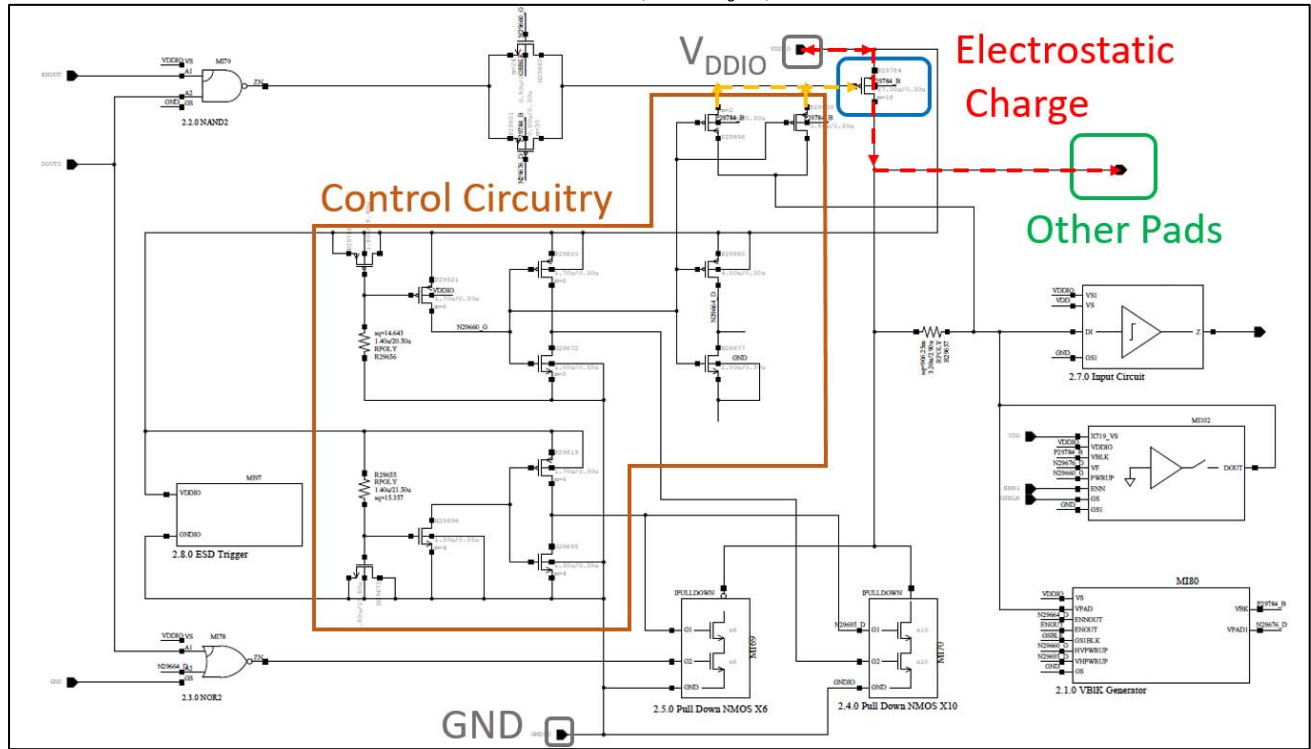
52. The control circuitry (dark orange below) of the other pads (green below) then enables the PMOS transistors of their respective output buffers (blue below), as shown below.

Other Pads (Pt. 2 of 3)



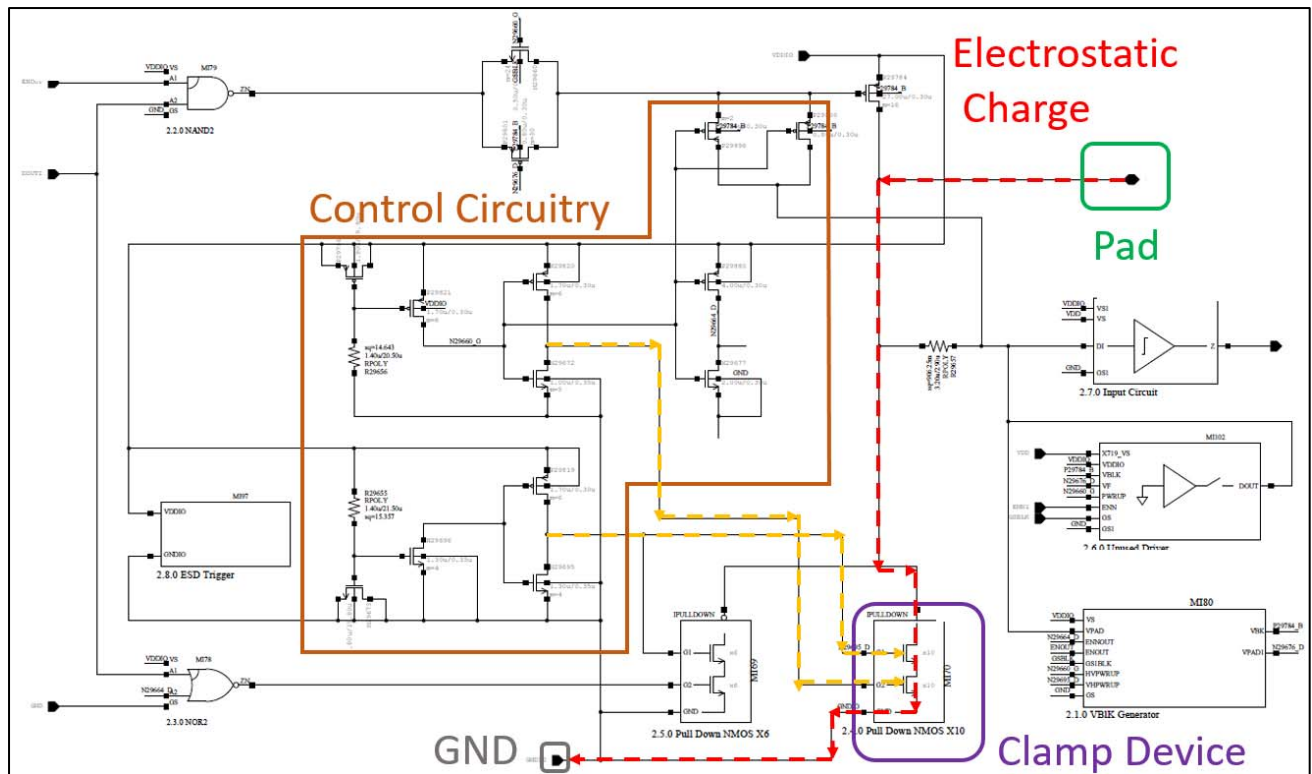
53. The PMOS transistors of the output buffers (blue below) then open electrical paths (dashed red line below) from the V_{DDIO} line to each pad (green below), allowing a portion of electrostatic charge to discharge to each pad, as shown below.

Other Pads (Pt. 3 of 3)



54. In so doing, the Boston-2 chip charges the combined capacitance of all pads in the system (*i.e.*, divides the charge among all pads) to reduce the maximum voltage developed as a result of the ESD event.

55. Finally, the control circuitry is operable to “turn on the clamp device in response to the ESD event.” During an ESD event, the control circuitry (dark orange below) enables (yellow below) both NMOS transistors of the clamp (purple below) to create an electrical path (dashed red line below) from the pad (green below) to GND, as shown below:



56. Upon information and belief, Aptiv Services has known that the Accused Products infringe the '665 Patent as early as 2012 through its detailed review of Microchip's USB patent portfolio, and no later than the June 8, 2023 scheduling conference in the Related Action during which Microchip's counsel stated that Microchip intended to assert claims for infringement of the '665 Patent against the Dual Role Hub. At least since the date when Aptiv Services learned of the '665 Patent, Aptiv Services' infringement of the '665 Patent has been willful and deliberate.

57. Aptiv Services also indirectly infringes the '665 Patent. Aptiv Services has induced and continues to induce the infringement of the '665 Patent by its customers, auto manufacturers, distributors, dealers, and/or infotainment system end users, knowing through its detailed review of Microchip's USB patent portfolio that its actions would induce such infringement.

58. Aptiv Services actively encourages its customers, auto manufacturers, and/or end users to infringe claims of the '665 Patent by providing the Accused Products, and advertising and

advising its customers and auto manufacturers how to incorporate the Accused Products into an infotainment system and/or automobile in a manner that infringes the '665 Patent.

59. On information and belief, Aptiv Services will continue to infringe and induce infringement of the '665 Patent unless enjoined by this Court.

60. As a result of Aptiv Services' infringement of the '665 Patent, Microchip has suffered and will continue to suffer damages in an amount to be proven at trial.

61. Microchip is entitled to recover damages for pre-suit infringement because it has complied with 35 U.S.C. § 287.

62. As a result of Aptiv Services' infringement of the '665 Patent, Microchip has suffered and will continue to suffer irreparable harm, unless Aptiv Services is enjoined against such acts by this Court.

63. As a result of at least Aptiv Services' willful infringement of the '665 Patent, Microchip is entitled to an award of its reasonable attorneys' fees, as provided by 35 U.S.C. § 285.

THIRD CAUSE OF ACTION

(INFRINGEMENT BY APTIV SERVICES)

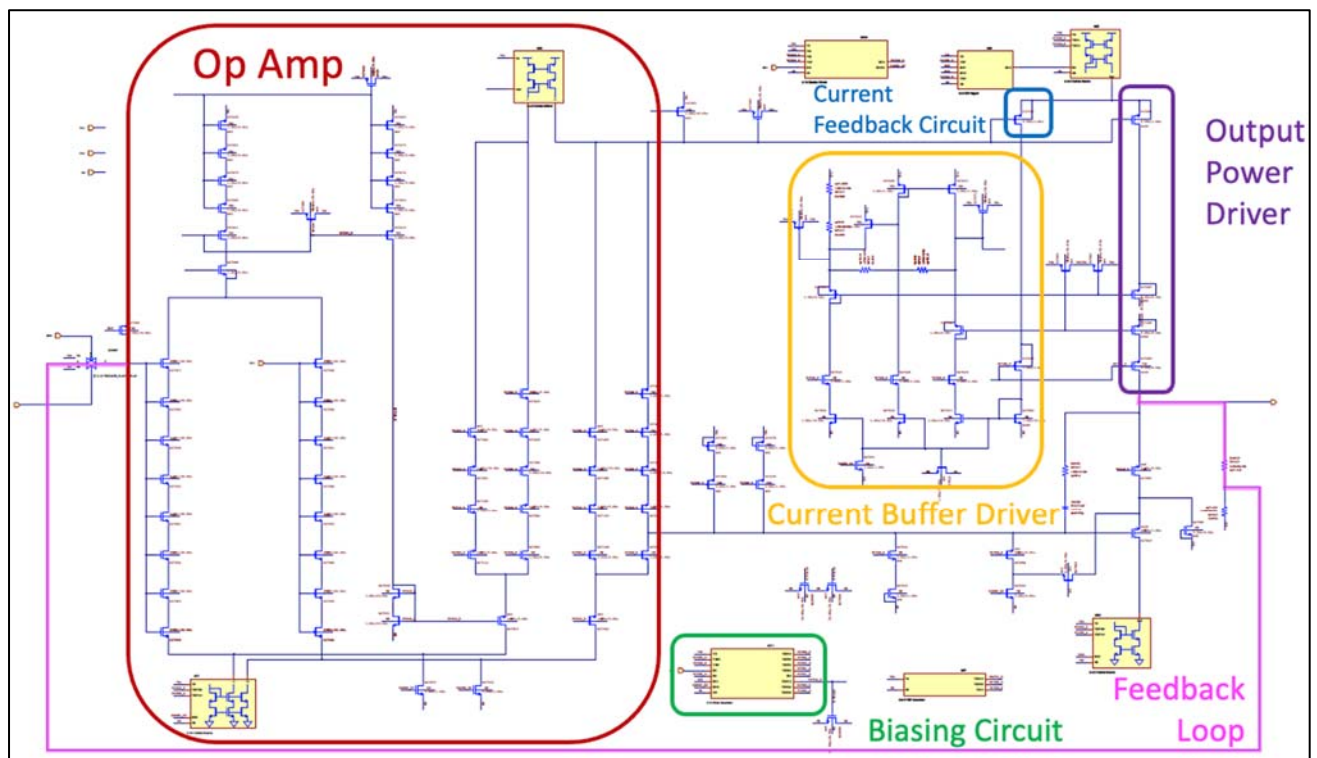
U.S. Patent No. 9,471,074

64. Microchip repeats and incorporates by reference Paragraphs 1 through 63 above as though fully set forth herein.

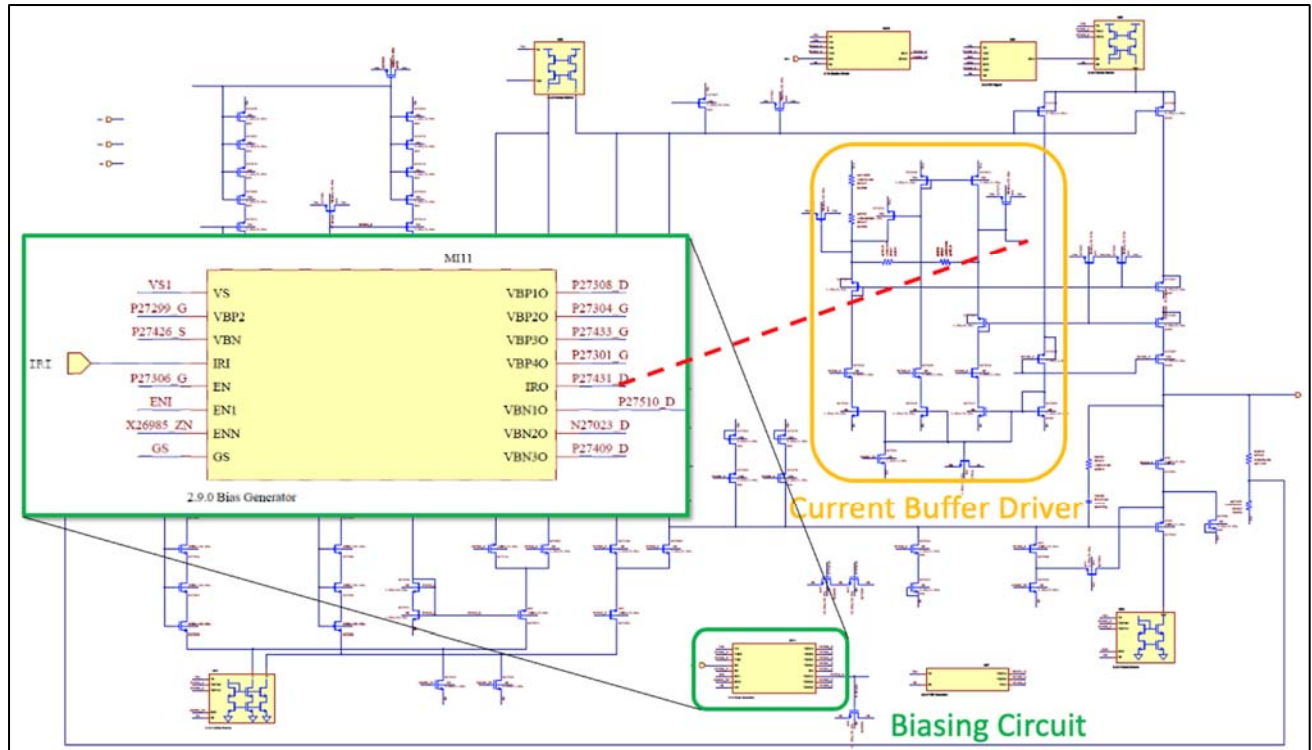
65. Aptiv Services has directly infringed and continues to directly infringe the '074 Patent at least by making, using, testing, offering to sell, selling, and/or importing into the United States the Accused Products, or by directing or controlling others to make, use, test, offer to sell, sell, and/or import into the United States those products.

66. The Accused Products infringe at least claim 1 of the '074 Patent. For example, the following circuit schematics derived from a teardown of the Boston-2 chip has a USB driver circuit that contains a voltage regulator.

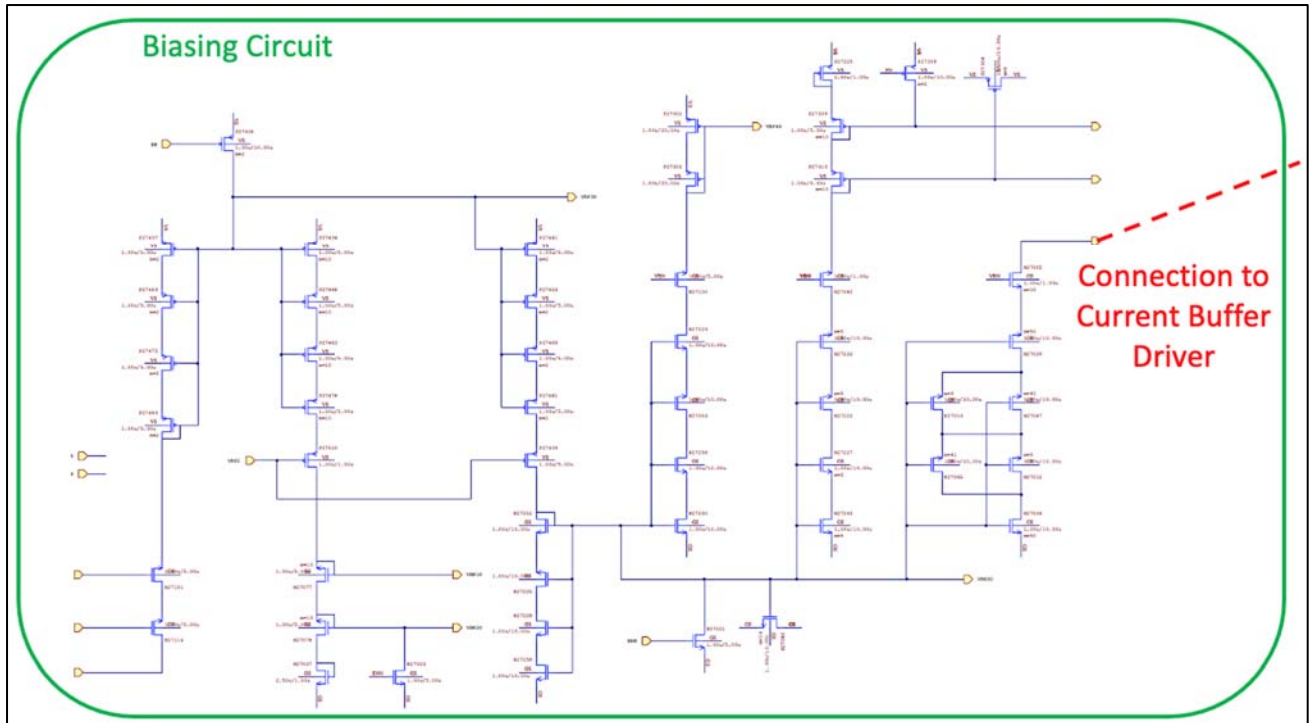
67. The voltage regulator has “an operational amplifier” (red below), “a gm enhanced current buffer driver” (yellow below), “a biasing circuit” (green below), “an output power driver” (purple below), “a current feedback circuit” (blue below), and “a feedback loop coupled between the output power driver and the operational amplifier” (pink below).



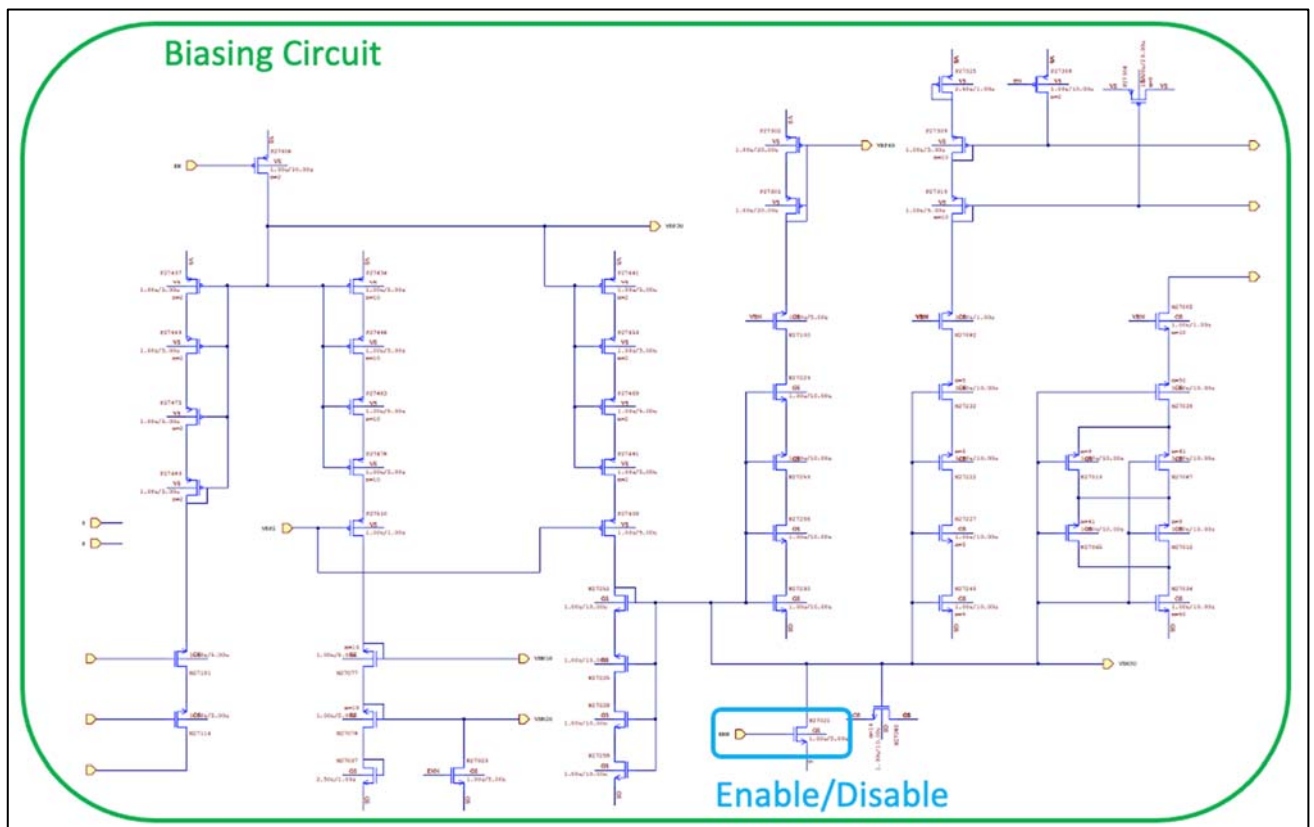
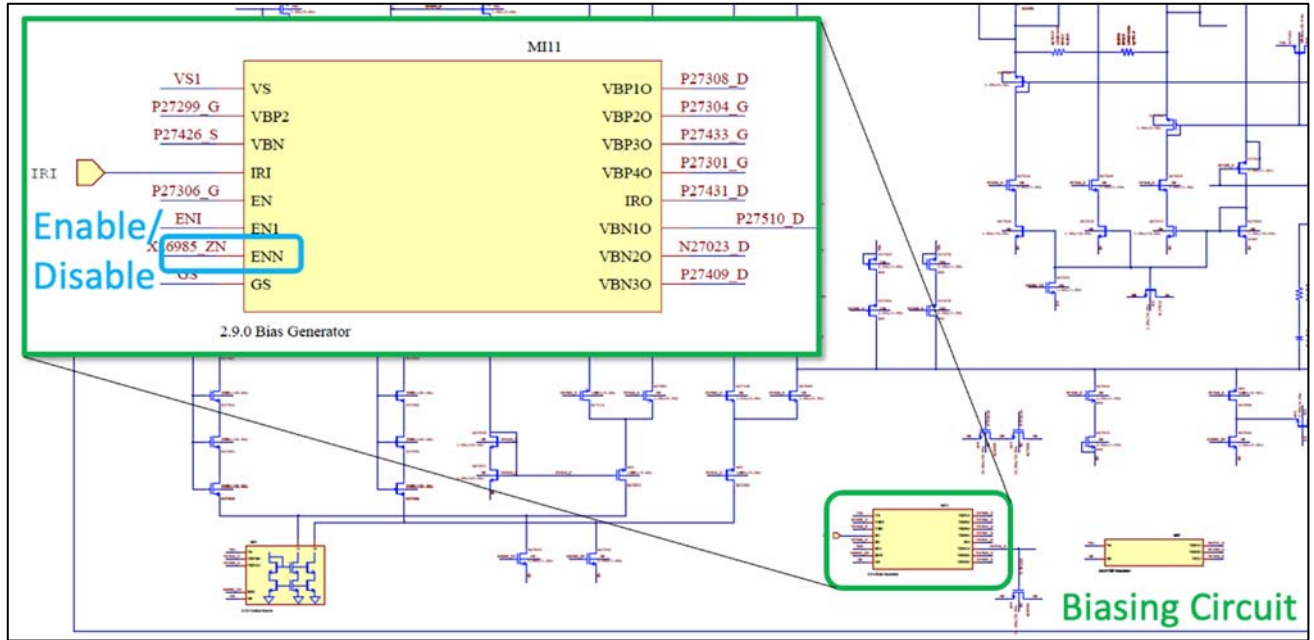
68. The “biasing circuit” (green below) is “coupled to the current buffer driver” (yellow below) by an electrical connection between the two nodes indicated below by the dashed red line.



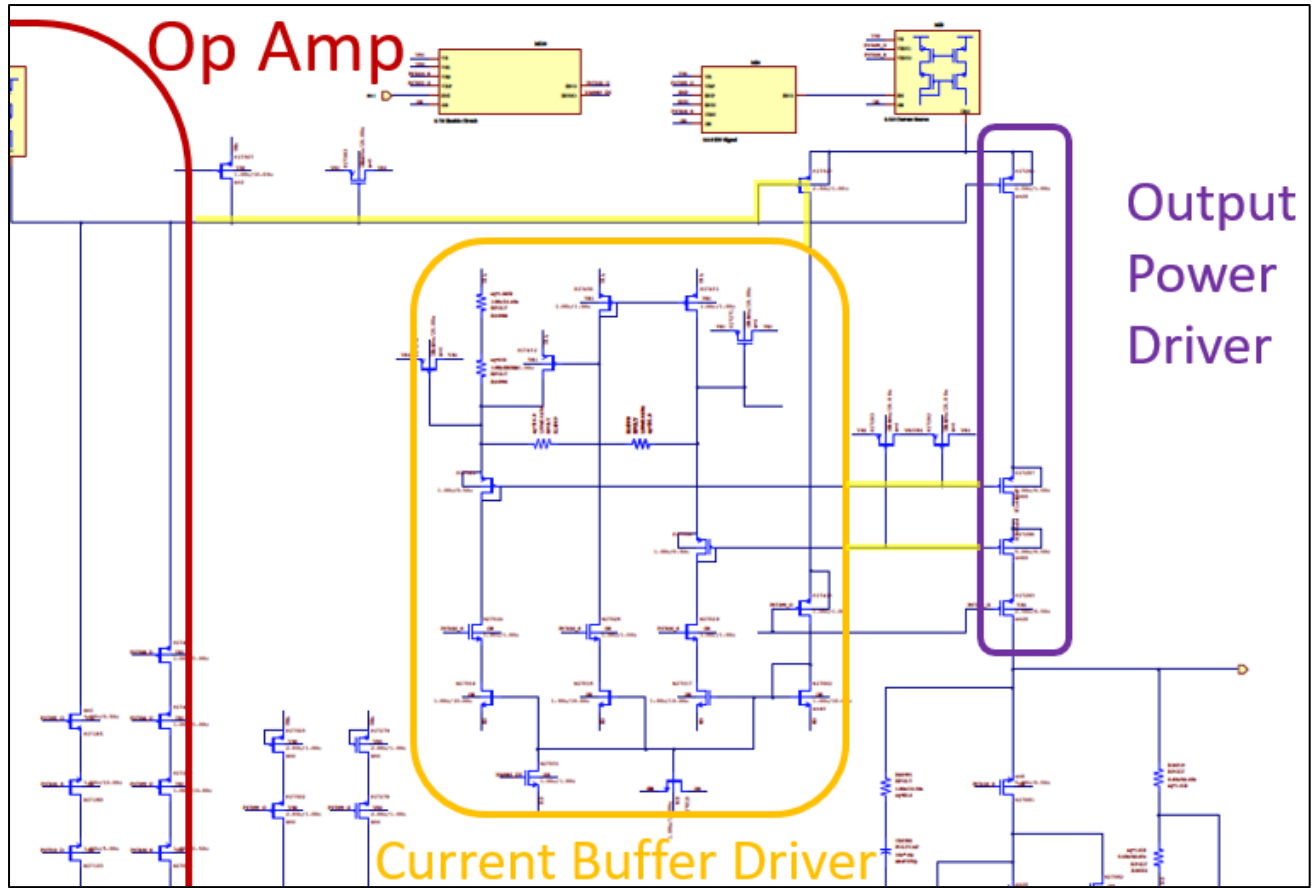
69. The biasing circuit is shown in greater detail in the below schematic. The voltage of the node that connects the biasing circuit to the current buffer driver determines the ratio of current that the current buffer driver draws from DC relative to the current feedback circuit. For at least this reason, the biasing circuit “set[s] a biasing ratio for the gm-boost of the current buffer driver.”



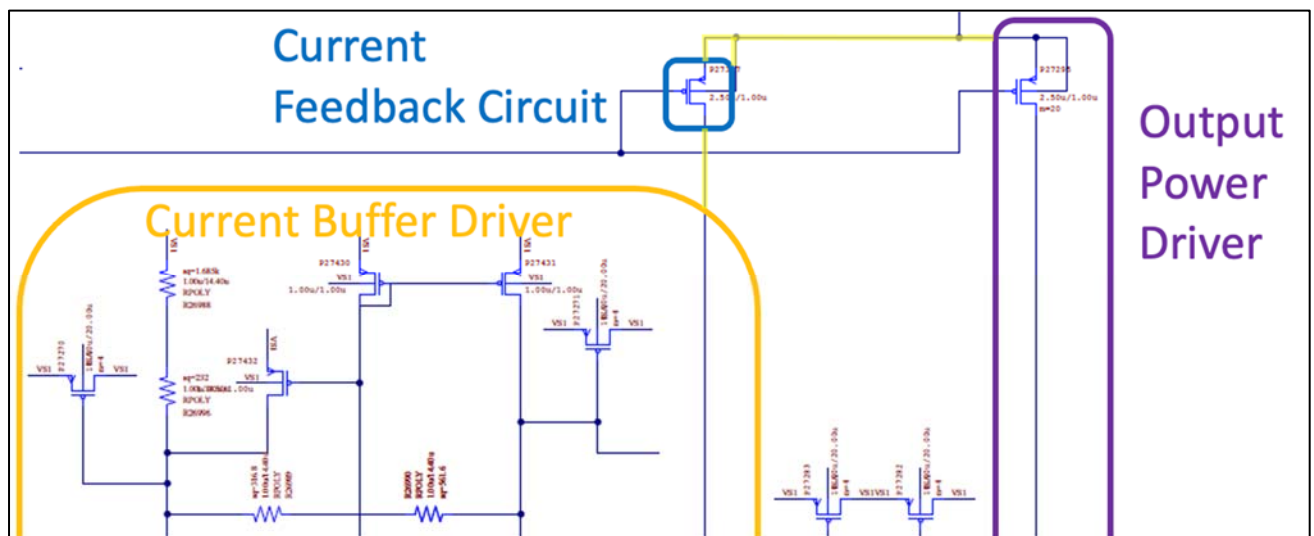
70. The voltage regulator further includes “an enable/disable function to enable/disable the biassing circuit for reducing standby current,” as demonstrated in the following schematics. Namely, an enable/disable signal can selectively enable or disable the transistor depicted in blue below. When this transistor is disabled, the biassing circuitry is disabled, thereby reducing current when the biassing circuitry is not in use.



71. Further, “the current buffer driver is coupled between the operational amplifier and the output power driver,” at least through the electrical connections highlighted in yellow in the schematic below.



72. Finally, the “current feedback circuit [is] coupled between the output power driver and the current buffer driver,” at least through the electrical connections highlighted in yellow below.



73. Upon information and belief, Aptiv Services knew that the Accused Products infringe the '074 Patent as early as 2016 through its detailed review of Microchip's USB patent portfolio, and no later than the May 11, 2023 filing of Microchip's counterclaims in the Relation Action that alleged infringement of the '074 Patent against the Dual Role Hub. At least since the date when Aptiv Services learned of the '074 Patent, Aptiv Services' infringement of the '074 Patent has been willful and deliberate.

74. Aptiv Services also indirectly infringes the '074 Patent. Aptiv Services has induced and continues to induce the infringement of the '074 Patent by its customers, auto manufacturers, distributors, dealers, and/or infotainment system end users, knowing through its routine review of Microchip's USB patent portfolio that its actions would induce such infringement.

75. Aptiv Services actively encourages its customers, auto manufacturers, and/or end users to infringe claims of the '074 Patent by providing the Accused Products, and advertising and advising its customers and auto manufacturers how to incorporate the Accused Products into an infotainment system and/or automobile in a manner that infringes the '074 Patent.

76. On information and belief, Aptiv Services will continue to infringe and induce infringement of the '074 Patent, unless enjoined by this Court.

77. As a result of Aptiv Services' infringement of the '074 Patent, Microchip has suffered and will continue to suffer damages in an amount to be proven at trial.

78. Microchip is entitled to recover damages for pre-suit infringement because it has complied with 35 U.S.C. § 287.

79. As a result of Aptiv Services' infringement of the '074 Patent, Microchip has suffered and will continue to suffer irreparable harm, unless Aptiv Services is enjoined against such acts by this Court.

80. As a result of at least Aptiv Services' willful infringement of the '074 Patent, Microchip is entitled to an award of its reasonable attorneys' fees, as provided by 35 U.S.C. § 285.

JURY DEMAND

Microchip demands a trial by jury on all issues raised in its Complaint that are so triable.

PRAYER FOR RELIEF

WHEREFORE, Microchip requests the following judgments and relief against Aptiv Services:

- a) A judgment that Aptiv Services has directly infringed and/or induced infringement of one or more claims of the Asserted Patents in connection with the Accused Products;
- b) A judgment and award of all damages sustained by Microchip as a result of Aptiv Services' infringement, including supplemental damages for any continuing post-verdict infringement up until entry of the final judgment with an accounting as needed;
- c) A permanent injunction enjoining Aptiv Services and anyone in concert with Aptiv Services from infringing or inducing infringement of the Asserted Patents;
- d) An award of Microchip's costs as the prevailing party;
- e) A judgment that Aptiv Services' infringement has been willful, and an award of enhanced damages pursuant to 35 U.S.C. § 284;
- f) A judgment that this case is exceptional under 35 U.S.C. § 285 and, accordingly, that Microchip is entitled to recover reasonable attorneys' fees and costs upon prevailing in this action;
- g) A judgment and an award of all interest and costs incurred; and
- h) Any award or any such other relief that the Court deems just and proper.

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

/s/ Brian P. Egan

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CERTIFICATE OF SERVICE

I hereby certify that on July 21, 2023, I caused the foregoing to be electronically filed with the Clerk of the Court using CM/ECF, which will send notification of such filing to all registered participants.

I further certify that I caused copies of the foregoing document to be served on July 21, 2023, upon the following in the manner indicated:

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