

MASCHOFF BRENNAN GILMORE & ISRAELSEN, PLLC
Sterling A. Brennan (Cal. Bar No. 126091)
sbrennan@mabr.com
Thomas P. Krzeminski (Cal. Bar No. 213714)
tkrzeminski@mabr.com
Saloni Mathur (Cal. Bar No. 335028)
smathur@mabr.com
100 Spectrum Center Drive, Suite 1200
Irvine, California 92618
Telephone: 949.202.1900
Facsimile: 949.453.1104

Kirk R. Harris (admitted *pro hac vice*)
kharris@mabr.com
Lannie Rex Sears (Cal. Bar No. 294533)
rsears@mabr.com
Ryan A. Cook (admitted *pro hac vice*)
rcook@mabr.com
111 South Main Street, Suite 600
Salt Lake City, Utah 84111
Telephone: 801.297.1850
Facsimile: 435.252.1361

Attorneys for Plaintiff Largan Precision Co., Ltd.

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

LARGAN PRECISION CO., LTD.,

Plaintiff,

vs.

MOTOROLA MOBILITY LLC,

Defendant.

Case No.: 4:21-cv-09138-JSW

**DECLARATION OF LEON CHEN IN
SUPPORT OF LARGAN PRECISION CO.,
LTD.'S OPPOSITION TO MOTOROLA
MOBILITY LLC'S MOTION TO STAY
PENDING *INTER PARTES* REVIEW**

**HIGHLY CONFIDENTIAL –
ATTORNEYS' EYES ONLY**

Date: August 19, 2022
Time: 9:00 am
Ctrm: Courtroom 5 – 2nd Floor
Judge: Hon. Jeffrey S. White

**Largan Precision Co., LTD.
EXHIBIT 2019
Motorola Mobility v.
Largan Precision Co., LTD.
IPR2022-01210**

Case No. 4:21-cv-09138-JSW
HIGHLY CONFIDENTIAL – ATTORNEYS' EYES ONLY

MASCHOFF BRENNAN GILMORE & ISRAELSEN, PLLC
Sterling A. Brennan (Cal. Bar No. 126091)
sbrennan@mabr.com
Thomas P. Krzeminski (Cal. Bar No. 213714)
tkrzeminski@mabr.com
Saloni Mathur (Cal. Bar No. 335028)
smathur@mabr.com
100 Spectrum Center Drive, Suite 1200
Irvine, California 92618
Telephone: 949.202.1900
Facsimile: 949.453.1104

Kirk R. Harris (admitted *pro hac vice*)
kharris@mabr.com
Lannie Rex Sears (Cal. Bar No. 294533)
rsears@mabr.com
Ryan A. Cook (admitted *pro hac vice*)
rcook@mabr.com
111 South Main Street, Suite 600
Salt Lake City, Utah 84111
Telephone: 801.297.1850
Facsimile: 435.252.1361

Attorneys for Plaintiff Largan Precision Co., Ltd.

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

LARGAN PRECISION CO., LTD.,
Plaintiff,
vs.
MOTOROLA MOBILITY LLC,
Defendant.

Case No.: 4:21-cv-09138-JSW

**DECLARATION OF LEON CHEN IN
SUPPORT OF LARGAN PRECISION CO.,
LTD.'S OPPOSITION TO MOTOROLA
MOBILITY LLC'S MOTION TO STAY
PENDING *INTER PARTES* REVIEW**

**HIGHLY CONFIDENTIAL –
ATTORNEYS' EYES ONLY**

Date: August 19, 2022
Time: 9:00 am
Ctrm: Courtroom 5 – 2nd Floor
Judge: Hon. Jeffrey S. White

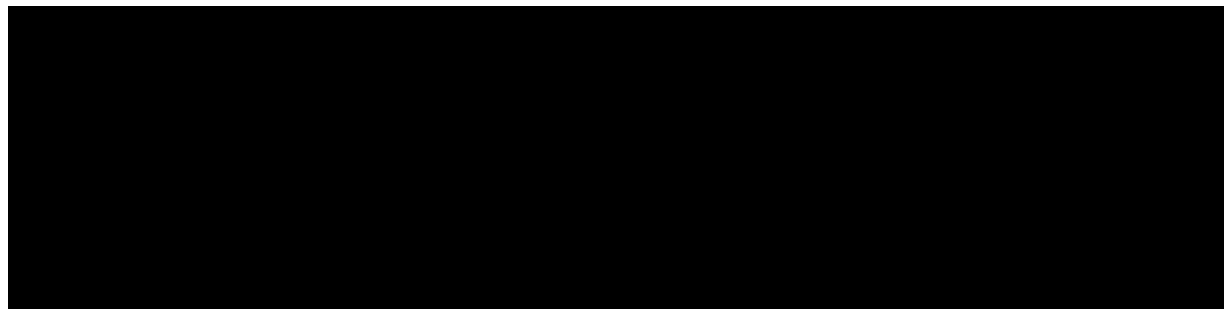
Leon Chen declares:

1. I am an in-house attorney for plaintiff Largan Precision Co., Ltd. I make this declaration based on my own personal knowledge, and based on records maintained by Largan in the ordinary course of business, to which I have access and upon which I rely in performing my duties for Largan.

2. On May 21 and June 16, 2021, Largan personnel (Mikey Huang) emailed personnel at Lenovo (Lei Zhao), defendant Motorola Mobility LLC's remote corporate parent, and conveyed that lens assemblies in Motorola smartphones appear to infringe Largan patents, including some of the patents in suit. Because those communications were largely ignored, on August 6, 2021, I escalated by sending to Lenovo's in-house counsel the letter truly and correctly reproduced as exhibit A hereto.

3. My August 6 letter gave more formal notice that "lenses and camera modules incorporated in the Motorola One 5G Ace," which is accused in the above-captioned action, "may infringe" certain Largan patents, including some of the patents in suit. But I also explained in the letter: "We would like to determine if your company has interest in purchasing and using Largan's lens products to be used in your products."

4. As my letter reflects, Largan's general practice is to use its patent rights to support its commercialization of its patents, in products made and sold by Largan.



6. Not long after this action was commenced, I was contacted by Sunny Optical Technology Company Limited. I was told that unless Largan drops its suit against Motorola, Sunny would bring retaliatory infringement claims against Largan.

1 7. Based on that communication, and market intelligence, I believe Sunny supplies
2 to Lenovo and Motorola at least the infringing main and wide lens assemblies in the accused
3 Motorola smartphone products. Based on market intelligence, I believe AAC Optics supplies to
4 Lenovo and Motorola at least some of the infringing front lens assemblies in the accused
5 Motorola smartphone products. Based on their websites and other market intelligence, I believe
6 Sunny is based in Zhejiang Province, and AAC is based in Guangdong Province, in the People's
7 Republic of China.

8 8. Thus, at issue in this litigation is whether Largan, on the one hand, or Sunny and
9 to a lesser extent AAC, on the other hand, will supply the market segment occupied by Motorola.
10 Whatever the outcome, indirect ripple effects throughout the smartphone market are expected to
11 follow, but the precise effects cannot be predicted confidently or quantified with reasonable
12 certainty.

13 I declare under penalty of perjury under the laws of the United States of America that the
14 foregoing is true and correct, to the best of my knowledge and belief.

15 Dated: July 8, 2022

16 
17 Leon Chen

EXHIBIT A

Largan Precision Co., Ltd.

No.11, Jingke Rd., Nantun Dist., Taichung, 40852 Taiwan

TEL: 886-4-3600-2345 FAX: 886-4-3600-6695

leonchen@largan.com.tw

Subject to FRE 408

Via email to lquatela@lenovo.com

Date: August 6, 2021

Page(s): 2

Attn: Ms. Laura Quatela

Senior Vice President and Chief Legal Officer

Lenovo Group Ltd.; Lenovo (United States) Inc.

Email: lquatela@lenovo.com

Our ref. no.: LP08062101

RE: Motorola Smartphone Product Patent infringement

Dear Ms. Quatela,

I write on behalf of Largan Precision Co., Ltd. ("Largan"), a leading company designing and producing lens assemblies that are used in electronic devices. Largan has numerous issued and pending patent applications related to optical systems and the manufacture thereof. We would like to determine if your Company has interest in purchasing and using Largan's lens products to be used in your products.

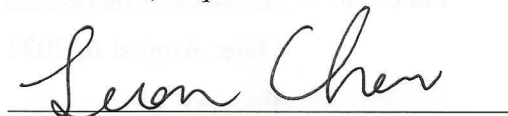
Please be notified that we found that the lenses and camera modules incorporated in the Motorola One 5G Ace may infringe at least the following claims of the US patents as listed in the table below.

Motorola One 5G Ace	Claim(s) of US Patents
Main Lens	Claim 16 of US 8310767 B2
	Claim 15 of US 8514499 B2
Wide Lens	Claim 1 of US 10209487 B2
	Claim 1 of US 10564397 B2

Enclosed, please find, for your review, a copy of the identified patents and the claim charts reading the patent claims onto the product. We may identify more patents to you. We look forward to your reply soon.

Sincerely yours,

Leon Chen, *Esq.*



In-house Counsel of

Largan Precision Co., Ltd.

Attachments: U.S. Patent No. 8,310,767; U.S. Patent No. 8,514,499; U.S. Patent No. 10,209,487; U.S. Patent No. 10,564,397 and Claim Charts