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May 28, 2026

VIA ELECTRONIC FILING

The Honorable Lisa R. Barton
Secretary to the Commission
U.S. INTERNATIONAL TRADE COMMISSION
500 E Street, SW, Room 112-A
Washington, DC 20436

Re: *Certain NAND and DRAM Memory Chips and Products Containing Same*; Inv. No. 337-TA-____
(DN 3908)

Dear Secretary Barton:

Complainant MonolithIC 3D™ Inc. (“MonolithIC 3D” or “Complainant”) hereby submits its First Supplement to the Verified Complaint (Docket No. 3908) filed on May 11, 2026, in response to a request from the Office of Unfair Import Investigations (“OUII”) for additional information. Complainant provides this supplement solely in response to OUII’s request. Complainant supplements by replacing paragraphs 24 and 59 of the Complaint with the following:

Complaint Paragraphs 24 and 59

24. Pursuant to 19 C.F.R. §§ 210.10(b)(1) and 210.12(a)(12), the categories of products accused of infringing one or more of the Asserted Patents are certain 3D NAND memory chips, HBM DRAM memory chips, NAND flash and NAND storage products, SSD products, DRAM products, AI-NAND products, HBF and HBF products, FPGA products, and PIM and PIM products, and memory products containing the same. The Proposed Respondents infringe the Asserted Patents through the sale for importation into the United States, importation into the United States, and/or sale within the United States after importation of such Accused Products. Exemplary identifications of such infringing products are provided in Sections V and VI below.

59. The product packaging for the Corsair MP700 Elite product, which incorporates the representative KIOXIA BiCS8 3D TLC product, identifies “Corsair Memory, Inc.” (*see* ¶ 52 *supra*) and states the product was “Made in Taiwan,” demonstrating that KIOXIA’s Accused Products are imported:



KIOXIA continues to import the Accused Products. In its Response to the Complaint in Investigation No. 337-TA-1492, KIOXIA admits that it imports 3D NAND memory chips, including the Accused Products. *See* KIOXIA’s 1492 Resp. at ¶¶ 13 (“KIOXIA admits that KIOXIA Corporation sells certain 3D NAND chips to the United States”), 14 (“KIOXIA admits that KIOXIA America, Inc. imports and sells after importation certain 3D NAND chips in the United States”), 59 (“KIC admits it manufactures certain KIOXIA 3D NAND memory chips abroad and sells them for importation to the United States. As identified in KIOXIA’s statement under 19 C.F.R. § 210.13(b) and Confidential Exhibit A, KAI admits it imports certain KIOXIA 3D NAND memory chips into the United States”) (EDIS Doc. ID 880920); *see also id.* at ¶¶ 61, 63, 96, 115, 116.

This supplement does not add additional respondents or allege additional unfair acts. *See* 19 C.F.R. § 210.14(a). The verification filed with the original complaint on February 17, 2026, remains accurate.

Please contact me with any questions regarding this submission. Thank you for your attention to this matter.

Respectfully Submitted,

/s/ Evan H. Langdon
Evan H. Langdon

Counsel for Complainant MonolithIC 3D™ Inc.

**CERTAIN NAND AND DRAM MEMORY CHIPS
AND PRODUCTS CONTAINING THE SAME**

Inv. No. 337-TA-____(DN3908)

CERTIFICATE OF SERVICE

I, Stanley Bryant, hereby certify that on May 28, 2026, a copy of the foregoing was filed
on EDIS and served on the following as indicated:

The Honorable Lisa R. Barton Secretary to the Commission U.S. International Trade Commission 500 E Street, SW, Room 112 Washington, DC 20436	☐ Via First Class Mail ☐ Via Courier (FedEx) ☐ Via Hand Delivery ☐ Via Email ☒ Via EDIS
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/s/ Stanley Bryant
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