



1401 Eye Street NW, Suite 800, Washington, DC 20005 • (202) 783-3300

June 12, 2026

Lauren E. Peterson
(202) 626-8320
lpeterson@polsinelli.com

Via EDIS

The Honorable Lisa R. Barton
Secretary to the Commission
U.S. International Trade Commission
500 E Street SW
Washington, DC 20436

**Re: *Certain Proteome Analysis Systems, Assay Kits, and Components
Thereof, Inv. No. 337-TA-__ (DN 3911)***

Dear Secretary Barton:

Enclosed for filing on behalf of Seer, Inc. and The Brigham and Women's Hospital, Inc. (collectively "Complainants") are the following documents in support of Complainants' request that the Commission commence an investigation pursuant to Section 337 of the Tariff Act of 1930, as amended:

1. One (1) electronic copy of the First Supplement to the Verified Complaint, pursuant to Commission Rule 210.8(a)(1)(i).
2. One (1) electronic copy of public Exhibit Nos. 10 and 41, and a public version of the confidential Exhibit 17H-C to the Complaint pursuant to Commission Rules 210.8(a)(1)(1) and 210.12(a)(9):
3. One (1) electronic copy of the confidential Exhibit 17H-C to the Complaint, pursuant to Commission Rules 201.6(c) and 210.8(a)(1)(ii).

The requisite paper copies of the above will be delivered to the Secretary pursuant to Commission Rule 210.8.

Please contact me with any questions regarding this filing.

Respectfully submitted,

/s/ Lauren E. Peterson
Lauren E. Peterson

*Counsel for Complainants Seer, Inc. and The
Brigham and Women's Hospital, Inc.*



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**Re: *Certain Proteome Analysis Systems, Assay Kits, and Components
Thereof, Inv. No. 337-TA-__ (DN 3911)***

Dear Secretary Barton:

Complainants Seer, Inc. and The Brigham and Women's Hospital, Inc. (collectively "Complainants") respectfully submit this First Supplement to the Verified Complaint (Docket No. 3911) filed on May 28, 2026, in response to a request from the Office of Unfair Import Investigations for additional information and clarification. Complainants provide this supplement solely in response to OUII's request. Complainants supplement the Complaint as follows:

Cover Page to Complaint

Please amend the cover page to the Complaint to add the following contact information:

Seer, Inc.: legal@seer.bio

The Brigham and Women's Hospital: phsogccontracts@mgb.org

Polsinelli PC: seer-nanomics-itc@polsinelli.com

Wilson Sonsini Goodrich & Rosati PC: wsgr-seervnanomics@wsgr.com

Complaint Paragraphs 151-157, 159

Please replace paragraphs 151-157 and 159 of the Complaint with the following paragraphs:

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151. Seer makes significant and substantial investments in plant and equipment, labor and capital, and engineering, research, and development with respect to products that practice one or more claims of the Asserted Patents (the “Domestic Industry Products”), including Seer Proteograph® XT and Proteograph® ONE Assay kits, and the SP100 and SP200 Automation Instruments. Specifically, all of the Domestic Industry Products practice the ’360, ’112, ’566, and ’948 Patents, and the Seer Proteograph® XT Assay kit with SP100 Automation Instrument practices the ’222 Patent. The Domestic Industry Products are designed, developed, marketed, and sold as the Proteograph® Product Suite.

152. Exhibits 49 through 53 are claim charts demonstrating that the Domestic Industry Products practice the Asserted Patents. The following table identifies the exemplary Domestic Industry Product with the corresponding practiced Asserted Patent and exemplary practiced claims.

Asserted Patent	Exemplary Domestic Industry Product	Exemplary Practiced Claims
U.S. Patent No. 11,435,360	Seer Proteograph® XT Assay kit with SP100 Instrument	2, 3, 5, 7-16, 18-21, 23, 24, 26-29
U.S. Patent No. 11,630,112	Seer Proteograph® XT Assay kit with SP100 Automation Instrument	1-9, 11-18, 22
U.S. Patent No. 12,050,222	Seer Proteograph® XT Assay kit with SP100 Automation Instrument	15, 16, 18-26, 30
U.S. Patent No. 12,228,566	Seer Proteograph® XT Assay kit and/or Seer Proteograph® ONE Assay kit with SP100 Automation Instrument	1-11, 16-20
U.S. Patent No. 12,590,948	Seer Proteograph® ONE Assay kit with SP200 Automation Instrument	1, 2

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Table 3: Claims Practiced by the Domestic Industry Products

153. An exemplary claim chart showing how the Domestic Industry Products practice exemplary claims of the '360 Patent is attached as Exhibit 49. This claim chart provides a basis for the technical domestic industry relating to the '360 Patent.

154. An exemplary claim chart showing how the Domestic Industry Products practice exemplary claims of the '112 Patent is attached as Exhibit 50. This claim chart provides a basis for the technical domestic industry relating to the '112 Patent.

155. An exemplary claim chart showing how the Domestic Industry Products practice exemplary claims of the '222 Patent is attached as Exhibit 51. This claim chart provides a basis for the technical domestic industry relating to the '222 Patent.

156. An exemplary claim chart showing how the Domestic Industry Products practice exemplary claims of the '566 Patent is attached as Exhibit 52. This claim chart provides a basis for the technical domestic industry relating to the '566 Patent.

157. An exemplary claim chart showing how the Domestic Industry Products practice exemplary claims of the '948 Patent is attached as Exhibit 53. This claim chart provides a basis for the technical domestic industry relating to the '948 Patent.

159. Seer has made and continues to make significant investments in labor and capital with respect to the Domestic Industry Products. Those investments in labor and capital are dedicated to research, development, design, engineering, product support, manufacturing, manufacturing support, software development, testing, sales and marketing, and various customer support activities focused on the Domestic Industry Products. Seer designed the Domestic Industry

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Products as a system, and as such, markets and sells them as a system. Seer therefore does not allocate its investments on a per-product basis in the ordinary course of business, however, approximately 53% of Seer's claimed R&D investments were made leading up to the commercial release of the Proteograph[®] XT which is used in combination with the SP100) in June 2023. The remaining approximately 47% of Seer's claimed R&D investments, which were made from July 2023 to present, focused on the Proteograph[®] ONE and SP200, which were launched in June 2025 as an improvement on the XT and SP100. Seer's R&D investments since June 2025 have included improvement projects related to the Proteograph[®] ONE and SP200.¹

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 May 28, 2026, remains accurate.

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

Respectfully submitted,

/s/ Lauren E. Peterson

Lauren E. Peterson

Joonho Hwang

Polsinelli PC

1401 Eye Street, N.W., Suite 800

Washington, D.C. 20005

Telephone: 202 626-8320

Email: seer-nanomics-itc@polsinelli.com

Jordan R. Jaffe

¹ Seer reserves the right to rely on alternative allocations.



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Catherine R. Lacey
Wilson Sonsini Goodrich & Rosati PC
One Market Plaza, Spear Tower, Suite 3300
San Francisco, CA 94105
Tel: (415) 947-2171

Michael T. Rosato
Jad Mills
Wilson Sonsini Goodrich & Rosati PC
701 Fifth Avenue, Suite 5100
Seattle, WA 98104
Tel: (206) 883-2529
Email: wsgr-seervnanomics@wsgr.com

*Counsel for Complainants Seer, Inc. and The
Brigham and Women's Hospital, Inc.*