

July 24, 2026

BY EDIS FILING

The Honorable Lisa R. Barton
Secretary to the Commission
U.S. International Trade Commission
500 E Street, S.W., Room 317
Washington, DC 20436

Re: *In the Matter of Certain Mobile Electronic Devices*, Inv. No. 337-TA-____ (Docket No. 3922)

Dear Secretary Barton:

Complainant Maxell, Ltd. (hereafter, “Maxell” or “Complainant”) hereby submits this First Amended Complaint (Docket No. 3922).

On July 10, 2026, Complainant submitted documents, including a complaint and supporting exhibits and appendices, in support of its request that the U.S. International Trade Commission (“Commission”) institute an investigation pursuant to Section 337 of the Tariff Act of 1930, as amended, concerning certain mobile electronic devices.

Pursuant to 19 C.F.R. § 210.14(a), Complainant files the attached First Amended Complaint that contains the following amendments:

- Complainant adds new Exhibit 50, corresponding to the LinkedIn Profile for Motorola Mobility cited in Paragraph 172 of the First Amended Complaint. The website page was identified in Paragraph 171 of the original Complaint, but the exhibit was inadvertently omitted.
- In Paragraphs 131 and 132, Complainant adds references to accused product purchases that occurred on June 17, 2026, and June 25, 2026. Photographs relating to such purchases were included in the original Complaint and remain in the First Amended Complaint.
- In Paragraph 149, the cited exhibit number was changed from 33 to 32.
- In Paragraph 168, a missing exhibit citation was changed to reference Exhibit 39.

- Paragraph 171 was added to provide clarity regarding the relationship between the Motorola Domestic Industry Products relied on for purposes of the instant Investigation and the Motorola Domestic Industry Products that underlay the Initial Determination in ITC Inv. No. 337-TA-1432.

Aside from the addition of Exhibit 50, no changes were made to the previously submitted exhibits or appendices. However, due to an error in filing of the original Complaint, the “Title” of the exhibits and appendices did not correspond correctly to the uploaded exhibit and appendix files. Accordingly, all exhibits and appendices are being refiled with this First Amended Complaint.

The First Amended Complaint does not add any additional respondents or allege additional unfair acts. *See* 19 C.F.R. § 210.14(a)

Accordingly, Complainant respectfully submits for filing the enclosed Verified First Amended Complaint and the following documents in support of its request that the Commission commence an investigation pursuant to Section 337 of the Tariff Act of 1930, as amended, concerning certain mobile electronic devices:

1. One (1) electronic copy of Complainant’s Verified First Amended Complaint (“First Amended Complaint”), pursuant to Commission Rules 210.8(a)(1)(i) and 210.12(a);
2. One (1) electronic copy of Complainant’s First Amended Complaint that shows amendments in redline;
3. One (1) electronic copy of the public exhibits to the Verified First Amended Complaint, pursuant to Commission Rules 210.8(a)(1)(i) and 210.12(a)(9), including:
 - a. One (1) electronic copy of the certified copies of United States Patent Nos. 10,812,646 (the “’646 Patent”); 12,061,760 (the “’760 Patent”); 12,418,692 (the “’692 Patent”); 12,185,211 (the “’211 Patent”), listed as Exhibits 1 and 3–5 to the Verified First Amended Complaint, pursuant to Commission Rule 210.12(a)(9)(i), as well as non-certified copies¹ of United States Patent Nos. 12,513,408 (the “’408 Patent”) and 12,647,935, listed as Exhibits 2 and 6 (collectively, “Asserted Patents”);
 - b. One (1) electronic copy of the certified recorded assignment for the ’646 Patent, listed as Exhibit 7 to the Verified First Amended Complaint, pursuant to Commission Rule 210.12(a)(9)(ii), as well as non-certified copies² of each recorded assignment for the ’760 Patent, ’692 Patent, ’211 Patent, ’408 Patent, and ’935 Patent, listed as Exhibits 8-12.

¹ Certified copies of the ’408 and ’935 Patents have been ordered, and once received, will be substituted for the non-certified copies.

² Certified copies of each recorded assignment for the ’760 Patent, ’692 Patent, ’211 Patent, ’408 Patent, and ’935 Patent have been ordered, and once received, will be substituted for the non-certified copies.

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4. One (1) un-certified copy³ of the U.S. Patent and Trademark Office prosecution history for each of the Asserted Patents, included as Appendices A–F to the First Amended Complaint, plus three additional copies thereof, pursuant to Commission Rule 210.12(c)(1).
5. One (1) copy of the prosecution histories of the priority applications for each of the Asserted Patents, included as Appendices G–T to the Verified First Amended Complaint, pursuant to Commission Rule 210.12(c)(2).
6. One (1) electronic copy of confidential Exhibits 13, 16, and 32 to the First Amended Complaint, pursuant to Commission Rules 201.6 and 210.8(a)(1)(i)(A).
7. A letter and certification requesting confidential treatment for the information contained in confidential Exhibits 13, 16, and 32 to the First Amended Complaint, pursuant to Commission Rules 201.6(b) and 210.5(d).⁴

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

Respectfully Submitted,



Jamie B. Beaber

Counsel for Complainant Maxell, Ltd.

Enclosures

³ Certified copies of the U.S. Patent and Trademark Office prosecution history for each of the Asserted Patents have been ordered, and once received, will be substituted for the non-certified copies.

⁴ The amendments set forth herein and in the attached do not impact Complainant's Statement of the Public Interest pursuant to Commission Rule 210.8(b) as initially filed on July 10, 2026. Accordingly, Complainant does not file a new Statement of the Public Interest.