UNITED STATES INTERNATIONAL TRADE COMMISSION
WASHINGTON, D.C.

In the Matter of **CERTAIN DYNAMIC RANDOM ACCESS MEMORY (DRAM) DEVICES AND NAND FLASH MEMORY DEVICES, PRODUCTS CONTAINING THE SAME, AND COMPONENTS THEREOF**	**Investigation No. 337-TA-_____**

COMPLAINT UNDER SECTION 337 OF THE TARIFF ACT OF 1930, AS AMENDED

Complainant:

Netlist, Inc.
111 Academy Way, Suite 100
Irvine, CA 92617
Tel: (949) 435-0025

Counsel for Complainant:

Daniel E. Yonan
Paul A. Ainsworth
Donald R. Banowit
William H. Milliken
Richard M. Bemben
Daniel S. Block
Lauren A. Watt
STERNE, KESSLER, GOLDSTEIN & FOX P.L.L.C.
1101 K Street NW, 10th Floor
Washington, DC 20005
Tel.: (202) 371-2600
Email: dyonan@sternekessler.com

Jason Sheasby
Annita Zhong, PhD
Andrew Strabone
Lisa Glasser
IRELL & MANELLA LLP
1800 Avenue of the Stars, Suite 900
Los Angeles, CA 90067
Tel.: (310) 277-1010
Email: jsheasby@irell.com

Proposed Respondents:

Kingston Technology Corp.
17600 Newhope Street
Fountain Valley, CA 92708

Kingston Technology Co., Inc.
17600 Newhope Street
Fountain Valley, CA 92708

Kingston Digital, Inc.
17600 Newhope Street
Fountain Valley, CA 92708

Kingston Technology Far East Corp.
No. 1-5, Li-Hsin Road,
1 Hsinchu Science Park,
Hsinchu, Taiwan 300094

Kingston Solutions, Inc.
10F-6, No. 251, Fuxing 1st Street
Zhongxing Vil., Zhubei City
Hsinchu City, Taiwan 302052

Kingston Technology Co., Ltd.
Room 801, Tower C, Ocean Office Park,
No. 5 Jinghua South Road,
Chaoyang District,
Beijing, China 100020

Kingston Technology (Shanghai) Co. Ltd.
No. 1 Yinglun Road,
Waigaoqiao Bonded Area,
Free Trade Test Zone Shanghai,
Shanghai, China 200131

Lenovo Group Ltd.
23rd Floor,
Lincoln House Taikoo Place
979 King's Road, Quarry Bay
Hong Kong, SAR, China

Lenovo PC HK Ltd.
23rd Floor, Lincoln House Taikoo Place
979 King's Road, Quarry Bay
Hong Kong, SAR, China

Lenovo (Beijing) Ltd.
No. 10, Yard 10
Northwest Wang East Road
Haidian District,
100080 Beijing, China

Lenovo (United States) Inc.
8001 Development Drive
Morrisville, NC 27560

Lenovo Global Tech. (United States) Inc.
8001 Development Drive
Morrisville, NC 27560

CDW Corp.
200 N. Milwaukee Avenue,
Vernon Hills, IL 60061

CDW Logistics LLC
200 N. Milwaukee Avenue,
Vernon Hills, IL 60061

Ingram Micro Inc.
3351 Michelson Drive, Suite 100
Irvine, CA 92612

Insight Enterprises, Inc.
2701 E. Insight Way
Chandler, AZ 85286

Insight Direct USA, Inc.
2701 E. Insight Way,
Chandler, AZ 85286

Zones, LLC
102 15th St SW #102
Auburn, WA 98001

TABLE OF CONTENTS

Page

I. INTRODUCTION 1

II. COMPLAINANT 7

III. THE PROPOSED RESPONDENTS 9

A. The Kingston Respondents 9

B. The Lenovo Respondents 11

C. The CDW Respondents 12

D. The Ingram Micro Respondent 13

E. The Insight Respondents 14

F. The Zones Respondent 15

IV. THE TECHNOLOGY AND PRODUCTS AT ISSUE 16

V. THE PATENTS AND NON-TECHNICAL DESCRIPTIONS OF THE INVENTIONS 19

A. U.S. Patent No. 10,025,731 19

1. Identification and Ownership of the ’731 Patent 19

2. Foreign Counterparts to the ’731 Patent 20

3. Non-Technical Description of the ’731 Patent 20

B. U.S. Patent No. 12,675,407 20

1. Identification and Ownership of the ’407 Patent 20

2. Foreign Counterparts to the ’407 Patent 21

3. Non-Technical Description of the ’407 Patent 21

C. U.S. Patent No. 11,200,120 22

1. Identification and Ownership of the ’120 Patent 22

2. Foreign Counterparts to the ’120 Patent 22

3. Non-Technical Description of the ’120 Patent 23
D. U.S. Patent No. 11,914,481 23
1. Identification and Ownership of the ’481 Patent 23
2. Foreign Counterparts to the ’481 Patent 24
3. Non-Technical Description of the ’481 Patent 24
VI. LICENSES 24
VII. THE PROPOSED RESPONDENTS’ INFRINGEMENT OF THE PATENTS 25
A. Infringement of U.S. Patent No. 10,025,731 25
B. Infringement of U.S. Patent No. 12,675,407 25
C. Infringement of U.S. Patent No. 11,200,120 25
D. Infringement of U.S. Patent No. 11,914,481 26
E. Indirect Infringement 26
VIII. SPECIFIC INSTANCES OF UNFAIR IMPORTATION AND SALE 28
A. Kingston 29
B. Lenovo 33
C. CDW 35
D. Ingram Micro 38
E. Insight 40
F. Zones 42
IX. HARMONIZED TARIFF SCHEDULE NUMBERS 43
X. THE DOMESTIC INDUSTRY RELATING TO THE ASSERTED PATENTS 43
A. The Technical Prong of the Domestic Industry Requirement Is Satisfied 44
B. The Economic Prong of the Domestic Industry Requirement Is Satisfied 45
1. Netlist’s Domestic Activities 46
2. Licensee SK hynix’s Domestic Activities 49

3. Licensee Samsung's Domestic Activities 56
4. Micron's Domestic Activities 61
XI. RELATED LITIGATION 66
A. The '731 Patent 66
B. The '407 Patent 68
C. The '120 Patent 69
D. The '481 Patent 70
XII. RELIEF REQUESTED 70

TABLE OF EXHIBITS

Exhibit No.	Description
1	Kingston Technology, Contact Kingston, https://www.kingston.com/en/company/contacts (last visited Oct. 28, 2026)
2	FindCompany, Kingston Solutions, Inc. (June 20, 2025), https://www.findcompany.com.tw/en/KINGSTON%20SOLUTIONS,%20INC
3	Infoclipper, Kingston Solutions, Inc., https://www.info-clipper.com/en/company/taiwan/kingston-solutionsinc.twdav5xxd.html (last visited Oct. 28, 2026)
4	Kingston Technology (Shanghai) Co., Ltd, Company Info – Registration China, https://www.registrationchina.com/company-search/info/?info=913100007642705964 (last visited Nov. 3, 2026)
5	Kingston Technology Co., Ltd, Company Info – Registration China, https://www.registrationchina.com/company-search/info/?info=91110105MA00GHF9XX (last visited Nov. 3, 2026)
6	NQA Certificate of Registration, Kingston Technology (Shanghai) Co., Ltd. (Nov. 10, 2025), https://media.kingston.com/kingston/company/pdf/KTCN-ANSI-ESD-S2020.pdf
7	Kingston Technology, Kingston Leads Channel SSD Shipments in 2024 (Nov. 20, 2025), https://www.kingston.com/en/company/press/article/78149
8	Kingston Technology, Kingston Retains No. 1 Position in Global DRAM Module Market (Sep. 28, 2026), https://www.kingston.com/en/company/press/article/79200
9	Lenovo, Corporate Information, https://investor.lenovo.com/en/about/corpinfo.php (last visited July 8, 2026)
10	Lenovo, Locations, https://www.lenovo.com/us/en/about/locations/ (last visited July 8, 2026)
11	S&P Capital IQ, Lenovo Group Limited ("Lenovo Group Pitchbook")
12	Delaware Corporation Report, Lenovo (United States) Inc. ("Lenovo US Delaware Corporation Report")
13	North Carolina Secretary of State Record, Lenovo (United States) Inc. ("Lenovo US North Carolina Secretary of State Record")
14	North Carolina Business Corporation Annual Report, Lenovo Global Technology (United States) Inc. (June 15, 2026)
15	Lenovo Group Limited 2025/26 Interim Report
16	Lenovo, Server Buying Guide, https://www.lenovo.com/us/en/server-buying-guide/ (last visited July 8, 2026)
17	CDW Corportation SEC 10-K Report (Feb. 20, 2026)
18	Illinois Secretary of State Business Entity Search, CDW Logistics LLC, https://apps.ilsos.gov/businessentitysearch/businessentitysearch (last visited Oct. 29, 2026)
19	Kingston Technology, Where to Buy, https://www.kingston.com/en/wheretobuy (last visited Oct. 28, 2026)
20	CDW, Brand Partners, https://www.cdw.com/content/cdw/en/brand.html (last visited Oct. 28, 2026)

21	CDW, Kingston and CDW, https://www.cdw.com/content/cdw/en/brand/kingston.html (last visited Oct. 28, 2026)
22	CDW, CDW US Locations, https://www.cdw.com/content/cdw/en/solutions/international/north-america-locations.html (last visited Oct. 28, 2026)
23	California Secretary of State, Statement of Information Corporation, Ingram Micro Inc. (Sep. 8, 2025), https://bizfileonline.sos.ca.gov/api/report/GetImageByNum/079006184002015165040136235052187102035103131076
24	Ingram Micro Holding Corp., Exhibit 21.1, Subsidiaries of the Registrant (Dec. 27, 2025) https://www.sec.gov/Archives/edgar/data/1897762/000162828026013588/exhibit211-subsidiariesoft.htm
25	VARINDIA, Kingston partners up with Ingram Micro for DRAM Business in India (Nov. 8, 2010), https://varindia.com/news/kingston-partners-up-with-ingram-micro-for-dram-business-in-india
26	Ingram Micro Holding Corp. SEC 10-Q Report (July 30, 2026), https://www.sec.gov/Archives/edgar/data/1897762/000162828026051053/ingm-20260627.htm
27	Insight Enterprises, Inc. SEC 10-K Report (Feb. 12, 2026), https://www.sec.gov/ix?doc=/Archives/edgar/data/0000932696/000093269626000007/nsit-20251231.htm
28	Insight, Kingston Technology, https://www.insight.com/en_US/shop/partner/kingston.html (last visited Nov. 2, 2026)
29	Insight, Solutions Integration Center, https://www.insight.com/en_US/about/newsroom/media-center/solutions-integration-center.html (last visited Nov. 2, 2026)
30	Washington State Corporations and Charities Filing System, Business Information, Zones LLC, https://ccfs.sos.wa.gov/?_gl=1*v6n1cs*_ga*MTA0ODU5NzM0NC4xNzkzMjA2OTQz*_ga_7B08VE04WV*czE3OTMyMDY5NDIkbzEkZzEkdDE3OTMyMDcwMDgkajYwJGwwJGgw*_ga_X6SDF160YQ*czE3OTMyMDY5NDIkbzEkZzEkdDE3OTMyMDcwMDgkajYwJGwwJGgw#/BusinessSearch/BusinessInformation (last visited Nov. 2, 2026)
31	Zones, Zones Partner Showcases, https://www.zones.com/site/statics/static_page.html?name=partner/showcase/index (last visited Nov. 2, 2026)
32	Zones, Kingston Showcase, https://www.zones.com/site/statics/static_page.html?name=partner/kingston/index&utm_source=shopbybrand-brand&utm_medium=website&utm_campaign=pp (last visited Nov. 2, 2026)
33	Zones, Primary OEM Partners, https://www.zones.com/site/statics/static_page.html?name=global/europe/primary-oem-partnerships (last visited Nov. 2, 2026)

34	Zones, IT Supply Chain Services, https://www.zones.com/site/statics/static_page.html?name=it-lifecycle-services/it-supply-chain-services (last visited Nov. 2, 2026)
35	Zones, IT Freight and Shipping Management Services, https://www.zones.com/site/statics/static_page.html?name=it-lifecycle-services/it-supply-chain-services/it-freight-and-shipping-management-services (last visited Nov. 2, 2026)
36	Zones, Outbound Manager, https://careers.zones.com/jobs/18370305-outbound-manager (last visited Nov. 2, 2026)
37	Zones, Resident Engineer - Data Center Infrastructure, https://careers.zones.com/jobs/18223870-resident-engineer-data-center-infrastructure
38	Certified U.S. Patent No. 10,025,731
39	Certified Assignment(s) of U.S. Patent No. 10,025,731
40	List of Foreign and Domestic Counterparts to Asserted Patents
41	Certified U.S. Patent No. 12,675,407
42	Certified Assignment(s) of U.S. Patent No. 12,675,407
43	Certified U.S. Patent No. 11,200,120
44	Certified Assignment(s) of U.S. Patent No. 11,200,120 and 11,914,481
45	Certified U.S. Patent No. 11,914,481
46	Public Version of List of Licensee(s) to One or More of the Asserted Patents (Redacted in its Entirety)
46C	Confidential Version of List of Licensee(s) to One or More of the Asserted Patents
47	Infringement Chart for U.S. Patent No. 10,025,731
48	Infringement Chart for U.S. Patent No. 12,675,407
49	Public Version of Infringement Chart for U.S. Patent No. 11,200,120
49C	Confidential Version of Infringement Chart for U.S. Patent No. 11,200,120
50	Public Version of Infringement Chart for U.S. Patent No. 11,914,481
50C	Confidential Version of Infringement Chart for U.S. Patent No. 11,914,481
51	YouTube, Enterprise Explained – SSD Testing Endurance and Reliability (Aug. 17, 2026), https://www.youtube.com/watch?v=e6QDNZGX_qs
52	YouTube, Flash: SLC, MLC, TLC, 3D – DIY in 5 Ep 277 (June 14, 2026), https://www.youtube.com/watch?v=eaPWQmwiSe0
53	YouTube, Gen5 NVMe U.2 SSD for Data Centers – Kingston DC3000ME (Apr. 14, 2026), https://www.youtube.com/watch?v=tHxImhBhKhw
54	Kingston Technology, Memory population rules, https://www.kingston.com/en/memory/memory-population-rules (last visited Oct. 28, 2026)
55	Kingston Technology, DDR5 6400 MT/s ECC Registered DIMM, https://www.kingston.com/en/memory/server-premier/ddr5-6400mts-ecc-registered-dimm (last visited Oct. 28, 2026)
56	Kingston Technology, DDR5 5600 MT/s ECC Registered DIMM, https://www.kingston.com/en/memory/server-premier/ddr5-5600mts-ecc-registered-dimm (last visited Oct. 28, 2026)

57	Kingston Technology, High-endurance SSDs for servers and data centers, https://www.kingston.com/en/ssd/servers-datacenters (last visited Oct. 28, 2026)
58	Kingston Technology, High-speed SSDs for desktops, laptops, and workstations, https://www.kingston.com/en/ssd/desktop-laptop-workstations?form%20factor=2.5%22%7Cmsata%7Cm.2%202280%7Cm.2%202230 (last visited Oct. 28, 2026)
59	Kingston Technology, High-performance SSDs for gaming, https://www.kingston.com/en/ssd/gaming?form%20factor=m.2%202280 (last visited Oct. 28, 2026)
60	HPE, HPE Memory QuickSpecs and Technical White Papers, https://support.hpe.com/hpesc/public/docDisplay?docId=sd00002129en_us&docLocale=en_US (last visited July 8, 2026)
61	HPE, HPE ProLiant Compute, https://www.hpe.com/us/en/compute/hpe-proliant-compute.html (last visited July 8, 2026)
62	HPE, HPE DDR5 Smart Memory QuickSpecs, https://www.hpe.com/us/en/collaterals/collateral.a50004302enw.html (July 8, 2026)
63	Lenovo, Introduction to DDR5 Memory (Nov. 10, 2022), https://lenovopress.lenovo.com/lp1618-introduction-to-ddr5-memory
64	Kingston Technology, Computer Memory – Find compatible RAM, https://www.kingston.com/en/memory (last visited Oct. 28, 2026)
65	Kingston Technology, Upgrade Your System with Kingston's High-Performance SSDs, https://www.kingston.com/en/ssd (last visited Oct. 28, 2026)
66	Kingston Technology, Kingston Worldwide, https://www.kingston.com/en/company/global (last visited Oct. 28, 2026)
67	SmartTechSavvy, Uncovering the Manufacturing Locations of Kingston Products: A Global Perspective, https://smarttechsavvy.com/where-are-kingston-products-made/ (last visited Oct. 28, 2026)
68	TweakTown, Kingston Factory Tour – Making of an SSD from Start to Finish (Nov. 3, 2020), https://www.tweaktown.com/articles/4655/kingston_factory_tour_making_of_an_ssd_from_start_to_finish/index.html
69	Forbes, Kingston Technology (Dec. 17, 2025), https://www.forbes.com/companies/kingston-technology/
70	Kingston Technology, The history of Kingston Technology, https://www.kingston.com/en/company/the-history-of-kingston (last visited Oct. 28, 2026)
71	Custom PC Review, Inside Kingston Technology Headquarters, USA (July 10, 2012), https://www.custompcreview.com/articles/inside-kingston-technology-headquarters-usa
72	Domestic Purchase Receipts for Kingston 32GB RDIMM Micron DRAM
73	Kingston Technology, KSM56R46BD8-32MH, https://www.kingston.com/en/memory/search?partid=KSM56R46BD8-32MH (last visited Nov. 4, 2026)
74	Domestic Purchase Receipts for Kingston 64GB RDIMM SK hynix DRAM

75	Kingston Technology, KSM56R46BD4-64HA, https://www.kingston.com/en/memory/search?partid=KSM56R46BD4-64HA (last visited Oct. 28, 2026)
76	Kingston Technology, KSM56R46BD4-64MH, https://www.kingston.com/en/memory/search?partid=KSM56R46BD4-64MH (last visited Oct. 28, 2026)
77	Newegg, Kingston NV3 500GB M.2 2280 NVMe SSD PCIe 4.0 Gen 4x4 Up to 5000 MB/s, https://www.newegg.com/p/2RC-00BY-00271 (last visited Oct. 28, 2026)
78	Domestic Purchase Receipts for Kingston DC3000ME NVMe SSD
79	Kingston Technology, KSM56R46BD8-32MH, https://www.kingston.com/en/memory/search/partnumber?partid=KSM56R46BD8-32MH&status=active (last visited Oct. 28, 2026)
80	Domestic Purchase Receipts for Kingston DC2000BM8_480G M.2
81	Kingston Technology, DC2000B PCIe 4.0 NVMe M.2 SSD, https://www.kingston.com/en/ssd/DC2000B-data-center-solid-state-drive?capacity=480gb&options=heatsink (last visited Nov. 4, 2026)
82	Domestic Purchase Receipts for Kingston NV3 500GB M.2
83	Kingston Technology, NV3 PCIe 4.0 NVMe SSD, https://www.kingston.com/en/ssd/nv3-nvme-pcie-ssd (last visited Nov. 4, 2026)
84	Domestic Purchase Receipts for Kingston FuryRenegadeG5 1024GB M.2 SSD
85	Kingston Technology, Kingston FURY Renegade G5 PCIe 5.0 NVMe M.2 SSD, https://www.kingston.com/en/ssd/gaming/kingston-fury-renegade-g5-nvme-m2-ssd (last visited Nov. 4, 2026)
86	Domestic Purchase Receipts for Kingston KC3000 4096GB M.2
87	Kingston Technology, KC3000 PCIe 4.0 NVMe M.2 SSD, https://www.kingston.com/en/ssd/kc3000-nvme-m2-solid-state-drive?capacity=4096gb
88	Domestic Purchase Receipts for Kingston FuryRenegadeG4 1TB M.2 SSD
89	Domestic Purchase Receipts for Kingston 32GB RDIMM Lenovo Label
90	Kingston Technology, Find System-Specific RAM, https://www.kingston.com/en/memory/system-specific (last visited Nov. 4, 2026)
91	Kingston Technology, Kingston server memory and storage solutions, https://www.kingston.com/en/solutions/servers-data-centers (last visited Nov. 4, 2026)
92	Kingston Technology, Lenovo - ThinkStation P5, https://www.kingston.com/en/memory/search/model/107530/lenovo-thinkstation-p5?status=active (last visited Nov. 4, 2026)
93	Kingston Technology, Lenovo - ThinkSystem SR630 V4, https://www.kingston.com/en/memory/search/model/109802/lenovo-thinksystem-sr630-v4?status=active (last visited Nov. 4, 2026)
94	Lenovo, Lenovo Manufacturing Sites and Suppliers (Mar. 2026), https://www.lenovo.com/content/dam/lenovo/site-design/esg-document-library/global/corp-policies/gsc/List_of_Lenovo_Mfg_Sites_and_Suppliers.pdf?srsltid=AU7gw4V-h2d82Mv1xO8ZET_Ycf4iPqRXg0ytlyeIh_v_2aNlaexoARZ9

95	Kingston Technology, Lenovo - ThinkPad E14, https://www.kingston.com/en/memory/search/model/100527/lenovo-thinkpad-e14?status=active (last visited Oct. 28, 2026)
96	Kingston Technology, Lenovo - ThinkPad T14 Gen 5 (Intel), https://www.kingston.com/en/memory/search/model/109650/lenovo-thinkpad-t14-gen-5-intel?status=active (last visited Oct. 28, 2026)
97	Kingston Technology, Kingston has the right SSD for your needs (2026), https://webobjects2.cdw.com/is/content/CDW/cdw/on-domain-cdw/brands/kingston/ssd-family-us.pdf?cm_sp=GlobalHeader-_-Products|Brands-_-Kingston
98	CDW, Kingston FURY Renegade Pro - DDR5 - kit - 128 GB: 8 x 16 GB - DIMM 288-pin, https://www.cdw.com/product/kingston-fury-renegade-pro-ddr5-kit-128-gb-8-x-16-gb-dimm-288-pin/7967139?pfm=srh (last visited Oct. 28, 2026)
99	CDW, Kingston FURY Renegade Pro - DDR5 - kit - 128 GB: 4 x 32 GB - DIMM 288-pin, https://www.cdw.com/product/kingston-fury-renegade-pro-ddr5-kit-128-gb-4-x-32-gb-dimm-288-pin/7967140?pfm=srh#tech-specs (last visited Oct. 28, 2026)
100	CDW, Kingston DC3000ME - SSD - Enterprise - 15.36 TB, https://www.cdw.com/product/kingston-dc3000me-ssd-enterprise-15.36-tb-u.2-pcie-5.0-x4-nvme/8284201?pfm=srh (last visited Oct. 28, 2026)
101	CDW, Kingston KC3000 - SSD - 4096 GB, https://www.cdw.com/product/kingston-kc3000-ssd-4096-gb-pcie-4.0-nvme/6742587?pfm=srh (last visited Oct. 28, 2026)
102	Kingston Technology, Product Change Notice (Aug. 21, 2025), https://www.mouser.com/PCN/Kingston_PCN_SEDC3000ME_C1.pdf?_gl=1*b2rmt*_gcl_au*MTU4NjI2Mzk3Mi4xNzkyNjMzMjU3*_ga*ODk3Njc2NTYxLjE3OTI2MzMyNTc.*_ga_15W4STQT4T*czE3OTI2MzMyNTkkbzEkZzAkdDE3OTI2MzMyNTkkajYwJGwwJGgw
103	CDW, Lenovo ThinkSystem SR650 - 2x Xeon Gold 6505P - 8x 64 GB, https://www.cdw.com/product/lenovo-thinksystem-sr650-xeon-gold-6505p/9121006 (last visited Oct. 28, 2026)
104	Ingram Micro, Kingston RAM Module - For Server - 96 GB - DDR5-6400/PC5-51200 DDR5 SDRAM Dual-rank Memory - CL52 - 1.10 V - ECC - Registered - 288-pin - DIMM, https://usa.ingrammicro.com/cep/app/product/productdetails?from=productsearch&id=060L18&bundletrackingID=null&searchId=a456428c-0d7f-429b-8dee-18f34ceaede7 (last visited Nov. 4, 2026)
105	eBay, SR630 V4 1x 6710E 64C 205W 2.4GHZ PROC, 1x 32GB DDR5, 2.5" OPEN BAY 1X 800W PSU, https://www.ebay.com/itm/226971417960 (last visited Nov. 3, 2026)
106	CDW Invoice No. 1CL81NC
107	Ingram Micro, Kingston DDR5 SDRAM Products, https://usa.ingrammicro.com/cep/app/product/productsearch?Memory+Technology=TECH_REFINE%7C%7Ceq%7C%7CDDR5+SDRAM%7C%7Cfalse%7C%7C&VENDORNAME=VEN_REFINE%7C%7Ceq%7C%7CKingston%7C%7Cfalse%7

	C%7C&Signal+Processing=TECH_REFINE%7C%7Ceq%7C%7CRegistered%7C%7Cfalse
108	Ingram Micro, Kingston RAM Module - For Server, Tech Specs, https://usa.ingrammicro.com/cep/app/product/productdetails?from=productsearch&id=050L49 (last visited Nov. 3, 2026)
109	Ingram Micro, Kingston Storage Devices - Solid State Disks, https://usa.ingrammicro.com/cep/app/product/productsearch?VENDORNAME=VEN_REFINE%7C%7Ceq%7C%7CKingston%7C%7Cfalse%7C%7C&DisableSuggestionSearch=false&EnablePNA=false&displaytitle=&keyword=&page=1&rowsPerPage=24&sortBy=relevance&title=Kingston&categoryHierarchy=%5B%7B%22categories%22%3A%5B%22Storage+Devices%22%5D%2C%22subCategory%22%3A%5B%22Solid+State+Disks%22%5D%7D%5D (last visited Nov. 4, 2026)
110	Ingram Micro, Kingston DC600M 960 GB Solid State Drive, https://usa.ingrammicro.com/cep/app/product/productdetails?from=productsearch&id=HB1783&bundletrackingID=null&searchId=afda1bd8-d49c-412a-a228-b78e9b96433b (last visited Oct. 28, 2026)
111	Ingram Micro, Kingston NV3 1 TB Solid State Drive, https://usa.ingrammicro.com/cep/app/product/productdetails?from=productsearch&id=NM0349&bundletrackingID=null&searchId=afda1bd8-d49c-412a-a228-b78e9b96433b (last visited Oct. 28, 2026)
112	Lenovo ThinkSystem SR630 V4 Manufacturer Brochure, https://inquirecontent2.ingrammicro.com/Manufacturer-Brochure/1089159940.pdf
113	Rapid, Kingston SKC3000S/1024G KC3000 1TB NVMe M.2 SSD PCIe 4.0 x4 Internal Storage, https://www.rapidonline.com/kingston-skc3000s-1024g-kc3000-1tb-nvme-m-2-ssd-pcie-4-0-x4-internal-storage-19-2177 (last visited Nov. 4, 2026)Ingram Micro, Kingston 1024GB KC3000 PCIE 4.0 NVME M.2 SSD, https://usa.ingrammicro.com/cep/app/product/productdetails?from=productsearch&id=9VM785 (last visited Oct. 28, 2026)
114	Ingram Micro, Locations, https://www.ingrammicro.com/en-us/company/about-us/locations (last visited Nov. 3, 2026)
115	Complaint, *Ingram Micro, Inc. v. AIT Worldwide Logistics, Inc.*, No. 3:23-cv-02079, Dkt. No. 1 (Nov. 9, 2023), ¶¶ 13, 14
116	Ingram Micro Invoice No. 0333282
117	Insight, Kingston - DDR5 - module - 32 GB, https://www.insight.com/en_US/shop/product/KTL-TS556D8-32G/kingston/KTL-TS556D8-32G/Kingston-DDR5-module-32-GB-DIMM-288pin-5600-MHz-PC544800-registered/ (last visited Nov. 3, 2026)
118	Insight, Kingston Data Center DC2000B - SSD - Enterprise, https://www.insight.com/en_US/shop/product/SEDC2000BM8%2F960G/kingston/SEDC2000BM8%2F960G/Kingston-Data-Center-DC2000B-SSD-Enterprise-960-GB-PCIe-40-x4-NVMe/#tab-specifications (last visited Nov. 3, 2026)
119	Insight, Kingston KC3000 - SSD - 4096 GB, https://www.insight.com/en_US/shop/product/SKC3000D%2F4096G/kingston/SKC3000D%2F4096G/Kingston-KC3000-SSD-4096-GB-PCIe-40-NVMe/ (last visited Nov. 3, 2026)

120	Insight, Lenovo ThinkStation P5 - tower, https://www.insight.com/en_US/shop/product/30GA0013US/LENOVO/30GA0013US/Lenovo-ThinkStation-P5---tower---Xeon-W5-2445-3-1-GHz---vPro-Enterprise---32-GB---SSD-1-TB---US/ (last visited Nov. 3, 2026)
121	Kingston Technology, KTL-TS556D8-32G, https://www.kingston.com/en/memory/search/systemdevices?partid=KTL-TS556D8-32G&rtd=True&page=2 (last visited Nov. 3, 2026)
122	Insight Invoice for Order No. 341014735
123	Zones, 2000G NV3 M.2 2280 NVMe SSD, https://www.zones.com/site/product/index.html?id=115322665&page_name=product_tech_spec&referer=cart (last visited Nov. 3, 2026)
124	Zones, 64G D5-5600R46B 2Rx4 RDIMM, https://www.zones.com/site/product/index.html?id=115021618&page_name=product_tech_spec (last visited Nov. 3, 2026)
125	Zones, IT Inventory and Warehouse Management Services, https://www.zones.com/site/statics/static_page.html?name=it-lifecycle-services/it-supply-chain-services/it-inventory-and-warehouse-management (last visited Nov. 3, 2026)
126	Zones, Global Supply Chain as a Service (GSCaaS), https://www.zones.com/site/statics/static_page.html?name=it-lifecycle-services/it-supply-chain-services/global-supply-chain-as-a-service (last visited Nov. 3, 2026)
127	Zones Invoice for Order No. B957385101
128	Domestic Industry Chart for U.S. Patent No. 10,025,731 – Micron
129	Public Version of Domestic Industry Chart for U.S. Patent No. 10,025,731 – Samsung
129C	Confidential Version of Domestic Industry Chart for U.S. Patent No. 10,025,731 – Samsung
130	Public Version of Domestic Industry Chart for U.S. Patent No. 10,025,731 – Netlist
130C	Confidential Version of Domestic Industry Chart for U.S. Patent No. 10,025,731 – SK hynix
131	Domestic Industry Chart for U.S. Patent No. 12,675,407 – Micron
132	Domestic Industry Chart for U.S. Patent No. 12,675,407 – Samsung
133	Public Version of Domestic Industry Chart for U.S. Patent No. 12,675,407 – Netlist + SK hynix
133C	Confidential Version of Domestic Industry Chart for U.S. Patent No. 12,675,407 – Netlist + SK hynix
134	Public Version Domestic Industry Chart for U.S. Patent No. 11,200,120 – Micron
134C	Confidential Version Domestic Industry Chart for U.S. Patent No. 11,200,120 – Micron
135	Public Version Domestic Industry Chart for U.S. Patent No. 11,200,120 – Samsung
135C	Confidential Version Domestic Industry Chart for U.S. Patent No. 11,200,120 – Samsung
136	Public Version Domestic Industry Chart for U.S. Patent No. 11,200,120 – SK hynix
136C	Confidential Version Domestic Industry Chart for U.S. Patent No. 11,200,120 – SK hynix

137	Public Version of Domestic Industry Chart for U.S. Patent No. 11,914,481 – Micron
137C	Confidential Version of Domestic Industry Chart for U.S. Patent No. 11,914,481 – Micron
138	Public Version of Domestic Industry Chart for U.S. Patent No. 11,914,481 – Samsung
138C	Confidential Version of Domestic Industry Chart for U.S. Patent No. 11,914,481 – Samsung
139	Public Version of Domestic Industry Chart for U.S. Patent No. 11,914,481 – SK hynix
139C	Confidential Version of Domestic Industry Chart for U.S. Patent No. 11,914,481 – SK hynix
140	Public Version of License Agreement Between Netlist and SK hynix (Redacted in its Entirety)
140C	Confidential Version of License Agreement Between Netlist and SK hynix
141	Public Version of License Agreement Between Netlist and Samsung (Redacted in its Entirety)
141C	Confidential Version of License Agreement Between Netlist and Samsung
142	Public Version of License Agreement Between Netlist and Micron (Redacted in its Entirety)
142C	Confidential Version of License Agreement Between Netlist and Micron
143	Counterpoint, Global DRAM and HBM Market Share: Quarterly (Sep. 1, 2026), https://counterpointresearch.com/en/insights/global-dram-and-hbm-market-share
144	TrendForce, Press Center, Combined Revenue of Top Five NAND Flash Brands Rises 77% QoQ in 2Q26; Micron Moves Up to Third Place, Says TrendForce (Aug. 18, 2026), https://www.trendforce.com/presscenter/news/20260818-13186.html
145	TrendForce, Press Center, Higher Prices and Shipments Drive Top Five Enterprise SSD Vendors' Revenue to Nearly US$37.59 Billion in 2Q26, Says TrendForce (Sep. 1, 2026), https://www.trendforce.com/presscenter/news/20260901-13210.html
146	Public version of information about Netlist's investments related to Domestic Industry Products (Redacted in its Entirety)
146C	Detailed confidential information about Netlist's investments related to Domestic Industry Products
147	Public Version of Supply Agreement Between Netlist and Samsung (Redacted in its Entirety)
147C	Confidential Version of Supply Agreement Between Netlist and Samsung
148	SK hynix, Full Stack AI Memory Creator, https://www.skhynix.com/company/UI-FR-CP02/ (last visited Oct. 28, 2026)
149	SK hynix, Product Portfolio, https://product.skhynix.com/home.go (last visited Oct. 28, 2026)
150	SK hynix, Global Network, https://www.skhynix.com/company/UI-FR-CP06 (Oct. 28, 2026)
151	SK hynix Inc. and Subsidiaries - Condensed Consolidated Interim Financial Statements (Unaudited) June 30, 2026 and 2025, https://mis-prod-koce-

	homepage-cdn-01-blob-ep.azureedge.net/web/attach/136258966284328189.pdf
152	Solidigm Newsroom, SK hynix completes the First Phase of Intel NAND and SSD Business Acquisition (Dec. 30, 2021), https://news.solidigm.com/en-WW/212943-sk-hynix-completes-the-first-phase-of-intel-nand-and-ssd-business-acquisition/
153	Solidigm, Who We Are, https://www.solidigm.com/who-we-are.html (last visited Oct. 28, 2026)
154	Solidigm, FAQs, https://www.solidigm.com/support/faqs.html (last visited Nov. 4, 2026)
155	SK hynix Newsroom, "Memory-Centric Server Systems Are the Future": SK hynix presents Its Next-Generation AI Infrastructure Vision at OCP Global Summit 2026 (Oct. 16, 2026), https://news.skhynix.com/en/ocp-global-summit-2026/
156	SK hynix Newsroom, The Next-Generation Memory Architecture in the AI Era? SK hynix Charts the Direction at 'FMS 2026' (Aug. 7, 2026), https://news.skhynix.com/en/fms-2026/
157	SK hynix Newsroom, SK hynix Reaffirms Partnership With NVIDIA at GTC 2026, Unveiling Latest AI Memory Portfolio (Mar. 16, 2026), https://news.skhynix.com/en/gtc-2026-exhibition-booth/
158	SK hynix Q1 2026 Earnings Slides
159	SK hynix Q2 2026 Earnings Slides
160	KuCoin, Solidigm, Former Intel NAND Unit, Eyes $150B IPO with $1.5T Valuation, https://www.kucoin.com/news/flash/solidigm-former-intel-nand-unit-eyes-150b-ipo-with-1-5t-valuation (last visited Nov. 4, 2026)
161	ElectronicsHub by Alibaba.com, Types of RAM Memory Guide: DDR4 vs DDR5, Modules & Use Cases (Sep. 3, 2026), https://electronics.alibaba.com/buyingguides/ddr5-ram-types-guide-what-you-actually-need-in-2026
162	Kingston Technology, Different Types of Server Memory and How They Impact Performance (Jan. 2026), https://www.kingston.com/en/blog/servers-and-data-centers/types-server-memory-impact-performance
163	SK hynix Q3 2026 Earnings Slides
164	BigGo Finance, SK Group Builds AI Data Center Testbed in California, Igniting Global Infrastructure Push (June 16, 2026), https://finance.biggo.com/news/tCxkzp4B7BdSoVMpPsqD
165	The Korea Daily, SK Hynix Acquires $49.5M San Jose Property in Cash Deal (May 6, 2026), https://en.koreadaily.com/sk-hynix-san-jose-real-estate-expansion-2026/
166	Solidigm Newsroom, Solidigm Expands Sacramento Development, Fueling Global AI Leadership (Apr. 2, 2026), https://news.solidigm.com/en-WW/263946-solidigm-expands-sacramento-development-fueling-global-ai-leadership/
167	SK hynix, SK & Project Overview, https://neuron.prf.org/wp-content/uploads/2025/04/Leaflet-for-SK-hynix-West-Lafayette_FINAL.pdf

168	BusinessKorea, SK hynix Expands U.S. Hiring for AI Memory Push (July 21, 2026), https://www.businesskorea.co.kr/news/articleView.html?idxno=273361
169	SK hynix, Current openings at SK hynix America, https://job-boards.greenhouse.io/skhynixamerica (last visited Oct. 29, 2026)
170	SK hynix, Staff Engineer, DRAM Field Application, https://job-boards.greenhouse.io/skhynixamerica/jobs/5166326008 (last visited Oct. 28, 2026)
171	SK hynix, Field Application Engineer, NAND/SSD, https://job-boards.greenhouse.io/skhynixamerica/jobs/5406257008 (last visited Oct. 28, 2026)
172	SK hynix memory solutions, Jobs, https://job-boards.greenhouse.io/skhynixmemorysolutionsamericainc (last visited Oct. 28, 2026)
173	SK hynix memory solutions, Principal Product Application Engineer - Enterprise SSDs, https://job-boards.greenhouse.io/skhynixmemorysolutionsamericainc/jobs/4302423009 (last visited Oct. 28, 2026)
174	Solidigm, Senior SSD Firmware Architect, https://jobs.smartrecruiters.com/Solidigm/744000150455631?trid=998bc6c9-cfbe-4db9-af4b-d7bb8407f264 (last visited Oct. 28, 2026)
175	Regulations.gov, Comment on FR Doc # 2022-01305, https://www.regulations.gov/comment/DOC-2021-0010-0089 (last visited Oct. 28, 2026)
176	TrendForce News, [News] SK hynix Reportedly Explores Leasing Intel's Ohio Fab, Could Produce Memory in U.S. for First Time (Sep. 16, 2026), https://www.trendforce.com/news/2026/09/16/news-sk-hynix-reportedly-explores-leasing-intels-ohio-fab-could-produce-memory-in-u-s-for-first-time/
177	Yahoo Finance, SK Hynix (SKHY) Weighs a U.S. NAND Plant. Would Lower China Risk Justify the Cost? (Sep. 25, 2026), https://finance.yahoo.com/technology/articles/sk-hynix-skhy-weighs-u-003823844.html
178	Samsung 2026 Half-year Business Report for the half-year ended June 30, 2026, https://images.samsung.com/is/content/samsung/assets/global/ir/docs/2026_Half_Interim_Report.pdf
179	Samsung Semiconductor, DRAM, DDR, https://semiconductor.samsung.com/dram/ddr/ (last visited Oct. 28, 2026)
180	Samsung Semiconductor, SSD, https://semiconductor.samsung.com/ssd/ (last visited Oct. 28, 2026)
181	Excerpted copy of Samsung Semi-Annual Report H1 2026
182	Samsung Semiconductor, OCP Global Summit 2026, https://semiconductor.samsung.com/events/ocp-2026/ (last visited Nov. 3, 2026)

183	Samsung Semiconductor Newsroom, Inside FMS 2026: Samsung Electronics Showcases the Future of AI Memory (Aug. 5, 2026), https://news.samsungsemiconductor.com/global/inside-fms-2026-samsung-electronics-showcases-the-future-of-ai-memory/
184	Seoul Economic Daily, Samsung to Supply 70% of Memory Under Long-Term Contracts (July 30, 2026), https://en.sedaily.com/finance/2026/07/30/samsung-to-supply-70-percent-of-memory-under-long-term
185	Samsung Electronics Earnings Presentation 1Q 2026, https://images.samsung.com/is/content/samsung/assets/global/ir/docs/2026_1Q_conference_eng.pdf
186	Samsung Electronics 2Q 2026 Earnings Call, https://images.samsung.com/is/content/samsung/assets/global/ir/docs/2026_2Q_conference_eng.pdf
187	TrendForce, Press Center, DRAM Industry Revenue Rises 59.5% QoQ in 2Q26 as Supply Expansion Continues to Lag Demand Growth, Says TrendForce (Sep. 7, 2026), https://www.trendforce.com/presscenter/news/20260907-13219.html
188	TrendForce, Press Center, Combined Revenue of Top Five Global NAND Flash Suppliers Rose by 83.7% QoQ for 1Q26 as Supply Shortages Drove Price Hikes (May 25, 2026), https://www.trendforce.com/presscenter/news/20260525-13058.html
189	TrendForce, Press Center, AI Agent Boom Triggers Enterprise SSD Supply Crunch; Top Five Enterprise SSD Brands Post Record US$18.46 Billion Revenue in 1Q26, Says TrendForce (June 11, 2026), https://www.trendforce.com/presscenter/news/20260611-13092.html
190	Samsung Electronics 3Q 2026 Earnings Call, https://images.samsung.com/is/content/samsung/assets/global/ir/docs/2026_3Q_conference_eng.pdf
191	TheRealDeal, Samsung buys 70k sf research building in San Jose for $27M (Mar. 3, 2025), https://therealdeal.com/san-francisco/2025/03/03/samsung-buys-70k-sf-research-building-in-san-jose-for-27m/
192	Samsung Semiconductor, Global Network, North America and Central / South America, https://semiconductor.samsung.com/support/contact-info/global-network/americas/ (last visited Oct. 28, 2026)
193	Samsung Semiconductor, US Fab, Austin, https://semiconductor.samsung.com/sas/company/austin/ (last visited Oct. 28, 2026)
194	Samsung Semiconductor, Samsung Electronics Announces New Advanced Semiconductor Fab Site in Taylor, Texas (Nov. 22, 2021), https://semiconductor.samsung.com/sas/local-news/samsung-electronics-announces-new-advanced-semiconductor-fab-site-in-taylor-texas/
195	Samsung Semiconductor, US Fab, Taylor, https://semiconductor.samsung.com/sas/company/taylor/ (last visited Oct. 28, 2026)

196	U.S. Department of Commerce, Biden-Harris Administration Announces CHIPS Incentives Award with Samsung Electronics to Solidify U.S. Leadership in Leading-Edge Semiconductor Production (Dec. 20, 2024), https://www.commerce.gov/news/press-releases/2024/12/biden-harris-administration-announces-chips-incentives-award-samsung
197	Samsung Semiconductor, Memory Labs, DRAM Design Lab, https://semiconductor.samsung.com/about-us/locations/us-rnd-labs/memory-labs/#dram-design-lab (last visited Oct. 28, 2026)
198	Samsung Semiconductor, Memory Labs, AGI Computing Lab, https://semiconductor.samsung.com/about-us/locations/us-rnd-labs/memory-labs/#agi-computing-lab (last visited Oct. 28, 2026)
199	Samsung Semiconductor, Memory Labs, Technology Enabling & Development Lab, https://semiconductor.samsung.com/about-us/locations/us-rnd-labs/memory-labs/#technology-enabling-and-development-lab (last visited Oct. 28, 2026)
200	Samsung, The Number of Employees in Each Country/Region (End of 2025), https://www.samsung.com/global/sustainability/policy-file/AZA5bnDqHM8ALYNu/Samsung_Electronics_The_number_of_employees_e/
201	The Korean Herald, Samsung spurring innovation from Silicon Valley (Dec. 24, 2024), https://www.koreaherald.com/article/3039525
202	Samsung Semiconductor, Jobs at Samsung Semiconductor, Inc, https://semiconductor.samsung.com/about-us/careers/jobs/?region=us (last visited Oct. 28, 2026)
203	Samsung Semiconductor, Senior Engineer, DRAM Applications, https://semiconductor.samsung.com/about-us/careers/job-detail/?pageUrl=https://job-boards.greenhouse.io/samsungsemiconductor/jobs/7813252003&region=us (last visited Oct. 29, 2026)
204	Samsung Semiconductor, Staff Engineer, SSD Storage and Systems Architecture, https://semiconductor.samsung.com/about-us/careers/job-detail/?pageUrl=https://job-boards.greenhouse.io/samsungsemiconductor/jobs/7994721003&region=us (last visited Oct. 29, 2026)
205	LinkedIn Profile, Kwang Hun Kim, https://www.linkedin.com/in/kwang-hun-kim-453a7911/
206	LinkedIn Profile, Dohyung Kim, https://www.linkedin.com/in/dohyung-kim-9269637/
207	Micron Technology SEC 10-K Report (Oct. 9, 2026), https://d18rn0p25nwr6d.cloudfront.net/CIK-0000723125/5dafce68-38e8-4cad-a8f3-ab56d04d73fd.pdf
208	Micron, DRAM memory modules, https://www.micron.com/products/memory/dram-modules (last visited Oct. 28, 2026)
209	Micron, Solid state drives, https://www.micron.com/products/storage/ssd (last visited Oct. 28, 2026)

210	Micron, Micron entities, https://www.micron.com/privacy/micron-entities (last visited Oct. 28, 2026)
211	LinkedIn, Micron Wins Three Awards at FMS 2026 for High-Performance Memory and Storage, https://lnkd.in/p/eNrqapfJ (last visited Oct. 29, 2026)
212	TweakTown, From Vera Rubin to PCIe Gen 6 and HBM4e, here's some of the tech we saw at NVIDIA GTC 2026 (Mar. 19, 2026), https://www.tweaktown.com/news/110548/from-vera-rubin-to-pcie-gen-6-and-hbm4e-heres-some-of-the-tech-we-saw-at-nvidia-gtc-2026/index.html
213	Micron FQ4 2026 Financial Results (Sep. 30, 2026), https://s25.q4cdn.com/621799436/files/doc_financials/2026/q4/Q4-26-Earnings-Deck.pdf
214	Micron, Locations, https://www.micron.com/about/locations (last visited Oct. 28, 2026)
215	Micron, Press Release, Micron Advances Made-in-America Memory With Manufacturing Expansion in Virginia (May 22, 2026), https://investors.micron.com/news/press-release/2026/Micron-Advances-Made-in-America-Memory-With-Manufacturing-Expansion-in-Virginia/default.aspx
216	Micron, Virginia expansion advances memory made in the USA, https://www.micron.com/us-expansion/va (last visited Oct. 28, 2026)
217	Micron, Press Release, Micron Opens State-of-the-Art Training Center in Boise to Strengthen America's Semiconductor Workforce (Aug. 24, 2026), https://investors.micron.com/news/press-release/2026/Micron-Opens-State-of-the-Art-Training-Center-in-Boise-to-Strengthen-Americas-Semiconductor-Workforce/default.aspx
218	LinkedIn Profile, Mike Hall, https://www.linkedin.com/in/mike-hall-392aa824/
219	Micron, Principal Technical Product Manager, https://careers.micron.com/careers/job/44096803 (last visited Oct. 28, 2026)
220	LinkedIn Profile, Vishwanath Tadikonda, https://www.linkedin.com/in/vishwanath-tadikonda-1968bb154/
221	Micron, Staff System Enablement Engineer, https://careers.micron.com/careers/job/42120335?domain=micron.com&hl=en (last visited Oct. 28, 2026)
222	LinkedIn, Micron Invests in US Manufacturing and Workforce, https://lnkd.in/p/eHJRTSCY (last visited Oct. 29, 2026)
223	U.S. News, Micron Boosts US Investment Plan Again, Commits $250 Billion Through 2035 (July 9, 2026), https://money.usnews.com/investing/news/articles/2026-07-09/micron-to-invest-up-to-3-billion-in-us-chip-supply-chain
224	NIST, Micron (Idaho), https://www.nist.gov/chips/micron-idaho-boise (last visited Oct. 28, 2026)
225	NIST, Micron (New York), https://www.nist.gov/chips/micron-new-york-clay (last visited Oct. 28, 2026)
226	NIST, Micron (Virginia), https://www.nist.gov/chips/micron-virginia-manassas (last visited Oct. 28, 2026)

227	Micron, Press Release, Micron Accelerates U.S. Investments, Pours First Concrete at New York Fab (July 9, 2026), https://investors.micron.com/news/press-release/2026/Micron-Accelerates-U-S--Investments-Pours-First-Concrete-at-New-York-Fab/default.aspx
228	Micron, Press Release, Micron Unveils Micron Research Labs, a U.S.-Based Long-Horizon Innovation Hub to Shape the Future of Memory and AI (Aug. 20, 2026), https://investors.micron.com/news/press-release/2026/Micron-Unveils-Micron-Research-Labs-a-U-S--Based-Long-Horizon-Innovation-Hub-to-Shape-the-Future-of-Memory-and-AI/default.aspx
229	LinkedIn, Micron Technology, What does it take to create one of the cleanest environments on earth?, https://www.linkedin.com/posts/what-does-it-take-to-create-one-of-the-cleanest-ugcPost-7486519784201678848-OsJo/ (last visited Oct. 28, 2026)
230	Micron, U.S. Expansion, New York, https://www.micron.com/us-expansion/ny (last visited Oct. 28, 2026)
231	Micron, Press Release, Micron Announces Up to $3 Billion Strategic Investment to Strengthen U.S. Semiconductor Ecosystem (July 9, 2026), https://investors.micron.com/news/press-release/2026/Micron-Announces-Up-to-3-Billion-Strategic-Investment-to-Strengthen-U-S--Semiconductor-Ecosystem/default.aspx
232	Kingston Technology, 6400MT/s Products, https://www.kingston.com/en/search/product?q=6400MT (last visited Nov. 4, 2026)
233	Kingston Technology, 5600MT/s Products, https://www.kingston.com/en/search/product?q=5600MT%2Fs (last visited Nov. 4, 2026)
234	Kingston Technology, 4800MT/s Products, https://www.kingston.com/en/search/product?q=4800mt%2Fs (last visited Nov. 4, 2026)
235	Kingston Technology, Kingston FURY Renegade Pro DDR5 RDIMM Memory, https://www.kingston.com/en/memory/gaming/fury-renegade-ddr5-pro-rdimm (last visited Nov. 4, 2026)
236	Kingston Technology, Industrial Solid-State Drives, https://www.kingston.com/en/industrial-ssd (last visited Nov. 4, 2026)
237	Kingston Technology, KC6000 Products, https://www.kingston.com/en/memory/search/partnumber?partid=KC600&status=active%7Cdiscontinued (last visited Nov. 4, 2026)
238	Kingston Technology, KC3000 Product Results, https://www.kingston.com/en/search?q=KC300 (last visited Nov. 4, 2026)
239	Kingston Technology, A400 Product Results, https://www.kingston.com/en/search?q=A400 (last visited Nov. 4, 2026)
240	Kingston Technology, NV3 Part Number Search Results, https://www.kingston.com/en/memory/search/partnumber?partid=NV3&status=active (last visited Nov. 4, 2026)

241	Kingston Technology, i-Temp 2.5” SATA SSD, https://www.kingston.com/en/industrial-ssd/itemp-2-5-inch-sata (last visited Nov. 4, 2026)
242	Law Street, Patent Owner Moves To Triple Jury Damages (Mar. 24, 2020), https://lawstreetmedia.com/news/tech/patent-owner-moves-to-triple-jury-damages/
243	Verified Market Reports, Global RDIMM Memory Chips Market Size, Share, Trends & Forecast 2026-2034, https://www.verifiedmarketreports.com/product/rdimm-memory-chips-market/ (last visited Oct. 28, 2026)
244	Counterpoint, Global NAND Memory Market Share: Quarterly, https://counterpointresearch.com/en/insights/global-nand-memory-market-share (last visited Oct. 28, 2026)
245	Lenovo, ThinkSystem SR630 V4 Rack Server, https://www.lenovo.com/us/en/p/servers-storage/servers/racks/lenovo-thinksystem-sr630-v4/len21ts0035?orgRef=https%253A%252F%252Fwww.bing.com%252F&msockid=3c3b92b1c6b46cda38938549c75b6dfc (last visited Nov. 4, 2026)
246	SK hynix memory solutions, Creating the future of eSSD, https://www.skhms.com/ (last visited Nov. 4, 2026)
247	SK hynix Newsroom, SK hynix America’s Renovated HQ Reopens to Advance AI Memory Leadership, https://news.skhynix.com/en/sk-hynix-america-renovated-hq-reopens-to-advance-ai-memory-leadership/ (last visited Nov. 4, 2026)
248	Great Place To Work, Micron Technology, https://www.greatplacetowork.com/certified-company/1397412 (last visited Nov. 4, 2026)
249	Public Version of Domestic Industry Chart for U.S. Patent No. 11,200,120 – Netlist
249C	Confidential Version of Domestic Industry Chart for U.S. Patent No. 11,200,120 – Netlist
250	Public Version of Domestic Industry Chart for U.S. Patent No. 11,914,481 – Netlist
250C	Confidential Version of Domestic Industry Chart for U.S. Patent No. 11,914,481 – Netlist
251	CNBC, How Micron’s $50 billion Boise buildout is reshaping its hometown (Aug. 20, 2026), https://www.cnbc.com/2026/08/20/micron-boise-chip-fab-expansion.html

TABLE OF CLAIM CHART EXHIBITS

EXHIBIT	DOCUMENT
CC-01	*High-capacity DDR5 solution from Micron's leading-edge 1β (1-beta) technology*, Micron ("DDR5 Brochure"); https://assets.micron.com/adobe/assets/urn:aaid:aem:6ffd17ac-e709-469d-9473-a0a904681dd9/renditions/original/as/128gb-ddr5-rdimm-product-brief.pdf
CC-02	*Unlock the power of more cores with MRDIMM*, Micron ("MRDIMM Product Brief"); https://assets.micron.com/adobe/assets/urn:aaid:aem:b19be6b5-f4bb-4367-bb0d-d583bdef5bae/renditions/original/as/mrdimm_product_brief.pdf
CC-03	DDR5 SDRAM RDIMM Core, Micron, Rev. G (May 2023) ("DDR5 RDIMM Datasheet" or "DDR5 DRAM Datasheet")
CC-04	DDR5 SDRAM, Micron, Rev. D (Oct. 2022) ("DDR5 Datasheet")
CC-05	DDR5 SDRAM, JESD79-5C.01_v1.31, JEDEC (April 2024) ("JESD79-5")
CC-06	*Why DDR5 is Absolutely Necessary in Modern Servers*, Serve the Home (Feb. 10, 2023); https://www.servethehome.com/why-ddr5-is-absolutely-necessary-in-modern-servers-micron/3/
CC-07	DDR5 SDRAM RDIMM Addendum, MTC20F2085S1RC, Micron, CCM005-80224854-9 (Rev. F, Dec 2022) ("DDR5 RDIMM Addendum")
CC-08	Scott Schlachter and Brian Drake, *Introducing Micron® DDR5 SDRAM: More Than a Generational Update*, Micron ("DDR5 White Paper"); https://assets.micron.com/adobe/assets/urn:aaid:aem:f1706cdb-4b55-4568-84bc-b7ee42f46236/renditions/original/as/ddr5-more-than-a-generational-update-wp.pdf
CC-09	16Gb DDR5 SDRAM Addendum
CC-10	Kankana Mazumdar, *DDR5's Secret Weapon: On-Die Termination (ODT) for Noise Reduction and Power Efficiency*, Intellectual Partners (Nov. 24, 2023) https://intellect-partners.com/blog/ddr5s-secret-weapon-on-die-termination-odt-for-noise-reduction-and-power-efficiency/
CC-11	Micron® DDR5: Client module features, Micron ("DDR5 Features White Paper") https://assets.micron.com/adobe/assets/urn:aaid:aem:5902f17e-8bde-4246-971c-8d7f274c6b1a/renditions/original/as/ddr5-key-module-features-wp-client.pdf
CC-12	M88MR5RCD01 Flyer, Montage Technology https://www.montage-tech.com/sites/default/files/2025-09/M88MR5RCD01_Flyer_English.pdf

CC-13	JEDEC Press Release/ JEDEC DDR5 MRDIMM Plan https://www.jedec.org/news/pressreleases/jedec-unveils-plans-ddr5-mrdimm-and-lpddr6-camm-standards-propel-high-performance
CC-14	Henrique Potter, *Beyond bandwidth: MRDIMM's edge in the data center revolution*, Micron (2025), ("MRDIMM Presentation"); https://files.futurememorystorage.com/proceedings/2025/20250807_DRAM-303-1_Potter.pdf
CC-15	Anton Shilov, *Micron unveils MRDIMMs for Intel Xeon 6: Up to 256GB DDR5-8800 modules*, Tom's Hardware (July 19, 2024) ("Tom's Hardware MRDIMM"); https://www.tomshardware.com/desktops/servers/micron-unveils-mrdimms-for-intel-xeon-6-up-to-256gb-ddr5-8800-modules.
CC-16	Micron MRDIMM memory https://www.micron.com/products/memory/dram-modules/mrdimm#accordion-8afc3a2b02-item-469d5d5cc2
CC-17	DDR5MDB02 Multiplexed Rank Data Buffer, JEDEC Standard JESD82-552 (Feb. 2026) ("JESD82-552")
CC-18	*Intentionally Omitted*
CC-19	*Intentionally Omitted*
CC-20	M88MR5RCD01, Montage Technology ("MRCD Brochure") https://www.montage-tech.com/Memory_Interface/DDR5/M88DR5RCD01
CC-21	RG5R188B0AIGBY Short-Form Datasheet, Renesas, R15DO0003EU0100 Rev 1.00 (May 15 2025) ("Renesas MRCD Datasheet")
CC-22	M88MR5DB01, Montage Technology ("MDB Brochure" / "M88MR5DB01 (Gen1 DDR5 MDB) Flyer")
CC-23	Montage DDR5 Products https://www.montage-tech.com/Memory_Interface/DDR5
CC-24	*Intentionally Omitted*
CC-25	JESD301-1 PMIC5000/PMIC5010 Power Management IC Standard, JEDEC, JESD301-1A.03, Rev. 1.85 (Feb. 2025) ("JESD301-1")
CC-26	TPS53832 Datasheet TPS53832 Datasheet, Texas Instruments (Sept. 2021)
CC-27	MPQ8896 Product Page MPQ8896 Product Page, MPS, available at https://www.monolithicpower.com/en/mpq8896.html
CC-28	MPQ8895 Product Page MPQ8895 Product Page, MPS, available at https://www.monolithicpower.com/en/products/mpq8895.html

CC-29	MPQ8894 Product Page MPQ8894 Product Page, available at https://www.monolithicpower.com/en/products/mpq8894.html
CC-30	JESD82-513
CC-31	JESD305
CC-32	JEDEC 82-512
CC-33	Netlist DDR5 DIMMs https://netlist.com/products/memory-module/ddr5-dimms/
CC-34	SK hynix Products https://netlist.com/products/sk-hynix/
CC-35	SK hynix Module https://product.skhynix.com/products/dram/module.go
CC-36	Product Images
CC-37	Netlist Lightning DDR5 DIMM https://netlist.com/products/lightning-ddr5-dimm/
CC-38	Public Version of Netlist DDR5 VLP RDIMM Datasheet Version 1.1 (Redacted in its Entirety)
CC-38C	Confidential Version of Netlist DDR5 VLP RDIMM Datasheet Version 1.1
CC-39	Public Version of Netlist DDR5 Overclock RDIMM Datasheet Version 1.0 (Redacted in its Entirety)
CC-39C	Confidential Version of Netlist DDR5 Overclock RDIMM Datasheet Version 1.0
CC-40	SK hynix A New Standard
CC-41	SK hynix RDIMM https://product.skhynix.com/products/dram/module/rdimm.go
CC-42	SK hynix MRDIMM https://product.skhynix.com/products/dram/module/mrdimm.go
CC-43	M88DR5RCD02 Flyer https://www.montage-tech.com/sites/default/files/2023-10/M88DR5RCD02_Flyer_English_1.pdf
CC-44	Netlist DDR5 DIMM Product Brief https://netlist.com/wp-content/uploads/2023/05/Nelist-DDR5-DIMM-Product-Brief.pdf
CC-45	Na et al., "A Novel Simulation Methodology Reflecting System Power Scenario using a Markov-Chain-based Stochastic Random Power Model," 2022 IEEE 72nd Electronic Components and Technology Conference; https://ieeexplore.ieee.org/document/9816494/
CC-46	DDR5 Command Truth Table https://blog.csdn.net/qq_38229351/article/details/128742660
CC-47	DDR Memory and the Challenges in PCB Design https://www.protoexpress.com/blog/ddr4-vs-ddr5-the-best-ram/
CC-48	Montage M88DR5RCD01 https://www.montage-tech.com/Memory_Interface/DDR5/M88DR5RCD01
CC-49	Netlist AI Server https://netlist.com/products/ai-server/

CC-50	TrendForce News MRDIMM-MCRDIMM Https://www.trendforce.com/news/2024/07/29/news-mrdimmmcrdimm-to-be-the-new-sought-afters-in-memory-field/
CC-51	Gen 2 RCD Renesas RG5R256 Https://www.renesas.com/en/products/rg5r256
CC-52	Gen 1 RCD Renesas 5RCD0148 Https://www.renesas.com/en/products/5rcd0148
CC-53	*Intentionally Omitted*
CC-54	*Intentionally Omitted*
CC-55	JEDEC JESD79-5B_v1.20
CC-56	Netlist Ultra Low Latency DDR5 RDIMM Product Brief https://netlist.com/wp-content/uploads/2024/12/Netlist-Lightning-DDR5-DIMM-Ultra-Low-Latency-Product-Brief.pdf
CC-57	Netlist Lightning DDR5 High Performance Module Product Brief https://netlist.com/wp-content/uploads/2024/12/Netlist-Lightning-DDR5-DIMM-OverClock-Product-Brief.pdf
CC-58	D. Kim et al., "A 1.1-V 10-nm Class 6.4-Gb/s/Pin 16-Gb DDR5 SDRAM With a Phase Rotator-ILO DLL, High-Speed SerDes, and DFE/FFE Equalization Scheme for Rx/Tx," IEEE Journal of Solid-State Circuits https://www.academia.edu/126179845/A_1_1_V_10_nm_Class_6_4_Gb_s_Pin_16_Gb_DDR5_SDRAM_With_a_Phase_Rotator_ILO_DLL_High_Speed_SerDes_and_DFE_FFE_Equalization_Scheme_for_Rx_Tx
CC-59	JEDEC D5 Chapter 5 https://zhuanlan.zhihu.com/p/689977256
CC-60	CSDN Blog, JESD79-5 https://blog.csdn.net/m0_61126667/article/details/132410760
CC-61	JESD79-5C_v1.30
CC-62	Montage HK Proof
CC-63	SK hynix Blog Post https://news.skhynix.com/sk-hynix-presents-groundbreaking-ai-server-memory-solutions-at-dtw-2025/
CC-64	SK hynix Newsroom Interview https://news.skhynix.com/interview-with-the-sk-hynix-team-behind-mcr-dimm/
CC-65	SK hynix Develops MCR DIMM https://news.skhynix.com/sk-hynix-develops-mcr-dimm/
CC-66	Montage Press Release https://www.montage-tech.com/Press_Releases/20250124
CC-67	DevX Memory Bus Definition https://web.archive.org/web/20240911162620/https://www.devx.com/terms/memorybus- 2/
CC-68	SK hynix TSMC 2025 Technology Symposium https://news.skhynix.com/tsmc-2025-technology-symposium-sk-hynix-showcases-hbm4/
CC-69	(LP)DDR5 Memory Interface Presentation

CC-70	Phoronix DDR5 Memory Channel Scaling Performance https://www.phoronix.com/review/ddr5-epyc-9004-genoa
CC-71	Netlist DDR5 MRDIMM Product Brief
CC-72	SK hynix DDR5
CC-73	JEDEC PS-005B
CC-74	Renesas P8910 Short Form Datasheet
CC-75	Renesas P8900 Short Form Datasheet
CC-76	Rambus DDR5 PMICs https://www.rambus.com/memory-interface-chips/ddr5-dimm-chipset/ddr5-server-pmics/
CC-77	Rambus DDR5 Server PMICs Product Brief https://www.rambus.com/memory-interface-chips/ddr5-dimm-chipset/ddr5-server-pmics/
CC-78	*Intentionally Omitted*
CC-79	*Intentionally Omitted*
CC-80	Rambus Expands Chipset https://www.rambus.com/rambus-expands-chipset-for-advanced-data-center-memory-modules-with-ddr5-server-pmics/
CC-81	JESD301-1A.03 Rev. 1.8.5 (March 2023) (JESD301-1A)
CC-82	JESD301-2
CC-83	JESD301-4A
CC-84	JESD301-6
CC-85	JESD301-1 Rev 1.0
CC-86	Netlist DDR5 Overclock RDIMM https://netlist.com/products/lightning-ddr5-dimm/overclock-rdimm/
CC-87	Montage M88DR5RCD02 https://www.montage-tech.com/Memory_Interface/DDR5/M88DR5RCD02
CC-88	JEDEC 305B DDR5 Registered Dual Inline Memory Module (RDIMM) Common Standard, JESD305B.01 v. 3.00, JEDEC, (Feb. 2026) ("JEDEC 305B")
CC-89	Samsung RDIMM Datasheet (M321R2GA3BB0, M321R4GA3BB0, M321R4GA0BB0 and M321R8GA0BB0) https://www.ssd.group/wp-content/uploads/2022/10/DatasheetDDR5_16Gb_B_RDIMM_M321RxGAxBB0_Rev1.1.pdf
CC-90	Short-Form Datasheet for RG5D188C1AIGBX DDR5 Multiplexing Data Buffer, Renesas https://www.renesas.com/en/document/sds/rg5d188c1aigbx-short-form-datasheet?srsltid=AfmBOoq7KGkxP0Q_F2UYGHd6r8EwLi3ZsWoejXZJmH11WnsGwnUSydX0
CC-91	"Server memory population rules for HPE ProLiant Gen11 servers with AMD EPYC 8004/9004 series processors," HPE Technical White Paper https://www.hpe.com/psnow/doc/a50007481enw

CC-92	"High Bandwidth Memory for AI," IEEE (July 2025) https://ieeexplore.ieee.org/abstract/document/11074880
CC-93	DDR5 Module Part Numbering System https://assets.micron.com/adobe/assets/urn%3Aaaid%3Aaem%3A4c7ee0 63-8a72-45c3-90c8-a0254083ccc7/renditions/original/as/numsdrammod.pdf
CC-94	Samsung Module Handling Guide https://datasheet.global/pdfviewer?url=https%3A%2F%2Fdatasheet.global%2Fdatasheet%2Fsemiconductorsamsung%2FSAMSUNG_DRAM_MODULE_HANDING_GUIDE.pdf
CC-95	Samsung DRAM Modules https://semiconductor.samsung.com/dram/ddr/
CC-96	*Intentionally Omitted*
CC-97	Montage M88DR5RCD03 https://www.montage-tech.com/Memory_Interface/DDR5/M88DR5RCD03
CC-98	Montage M88DR5RCD04 https://www.montage-tech.com/Memory_Interface/DDR5/M88DR5RCD04
CC-99	Gen 3 RCD Renesas RG5R364 https://www.renesas.com/en/products/rg5r364
CC-100	Gen 4 RCD Renesas RRG5004 https://www.renesas.com/en/products/rrg5004
CC-101	Kingston Technology DDR5 Overview https://www.kingston.com/en/blog/pc-performance/ddr5-overview
CC-102	IPR2023-00203, EX1033
CC-103	FAC Ex. 6, 25-cv-557 (EDTX)
CC-104	Samsung Optimized DDR5 DIMM Solutions https://semiconductor.samsung.com/news-events/tech-blog/optimized-ddr5-dimm-solutions-powering-leading-edge-server-memory-modules/
CC-105	Samsung Hot Chips 2021 Presentation; also filed as *Netlist, Inc. v. Samsung Electronics Co. Ltd. et al.*, No. 2:25-cv-00557-JRG, Dkt. No. 14-5 (E.D. Tex. July 8, 2025) ("FAC Ex. 5")
CC-106	Samsung's massive DDR5 512GB RAM modules https://www.sammyfans.com/2021/08/24/samsungs-ddr5-512gb-ram-modules-are-twice-as-powerful-as-ddr4/
CC-107	All About Circuits ISSCC 2024 https://www.allaboutcircuits.com/news/isscc-2024-samsung-doubles-ddr5-capacity-with-symmetric-mosaic-architecture/
CC-108	FAC Ex. 10, 25-cv-557 (EDTX)
CC-109	Intel Dynamic ODT in DDR4 https://www.intel.com/content/www/us/en/docs/programmable/772538/24-2-6-2-0/dynamic-on-die-termination-odt-in-ddr4.html
CC-110	FAC Ex. 7, 25-cv-557 (EDTX)

CC-111	Samsung MRDIMM M327R8GA0EB0-CLVXB / image of Samsung MRDIMM
CC-112	Samsung MRDIMM M327R8GA0EB0-CLVXB / image of Samsung MRDIMM
CC-113	Samsung MRDIMM M327R8GA0EB0-CLVXB / image of Samsung MRDIMM
CC-114	Samsung MCRDIMM Tech Blog https://semiconductor.samsung.com/news-events/tech-blog/innovative-memory-solution-samsungs-mcrdimm-targets-high-performance-computing/
CC-115	Samsung MRDIMM M327R8GA0EB0-CLVXB Image 4
CC-116	Samsung 64GB DDR5 4800MHz PC5-38400 ECC RDIMM 2Rx4 (EC8 10x4), Dual Rank 1.1V Registered DIMM 288-Pin Server RAM Memory M321R8GA0BB0-CQK
CC-117	Samsung 64GB DDR5 5600MHz PC5-44800 ECC RDIMM 2Rx4 (EC8 10x4), Dual Rank 1.1V Registered DIMM 288-Pin Server RAM Memory M321R8GA0PB0-CWM
CC-118	Samsung 64GB DDR5 PC5-4800 EC8 RDIMM 2Rx4 M321R8GA0BB0-CQK
CC-119	Samsung 64GB DDR5 PC5-6400 EC8 RDIMM 2Rx4 M321R8GA0PB2-CCP
CC-120	Samsung, “Memory VR changes in the system by DDR5 adoption”
CC-121	Samsung 32GB DDR5 PC5-4800 EC8 RDIMM 1Rx4 M321R4GA0BB0-CQK (photo)
CC-122	EDTX Trial Tr. Day 2, 4 (2023)
CC-123	MPQ8895F https://www.monolithicpower.com/en/products/mpq8895f.html
CC-124	TPS53832A Product Overview https://www.ti.com/product/TPS53832A#product-details
CC-125	TPS53832A Data Sheet https://www.ti.com/lit/ds/symlink/tps53832a.pdf?ts=1786219163893
CC-126	TPS53830A Product Overview https://www.ti.com/product/TPS53830A#product-details
CC-127	TPS53830A Data Sheet https://www.ti.com/lit/ds/symlink/tps53830a.pdf?ts=1786163651143
CC-128	TPS53830 Product Overview https://www.ti.com/product/TPS53830#product-details
CC-129	TPS53830 Data Sheet https://www.ti.com/lit/ds/symlink/tps53830.pdf?ts=1786149944431
CC-130	TPS53832 Product Overview https://www.ti.com/product/TPS53832#product-details
CC-131	S2FPD01 Brochure
CC-132	S2FPD01 Memory Power IC / PMIC5010
CC-133	S2FPD02 Memory Power IC / Standard PMIC5000
CC-134	S2FPD73 Memory Power IC / Standard PMIC5020

CC-135	TPS53840 Product Overview https://www.ti.com/product/TPS53840#features
CC-136	TPS53840 Data Sheet https://www.ti.com/lit/ds/symlink/tps53840.pdf?ts=1786159925843
CC-137	JESD301-5 / PMIC5030 specification
CC-138	Renesas P8911 Short-Form Datasheet https://www.renesas.com/en/document/sds/p8911-short-form-datasheet?srsltid=AfmBOooTYT0IxgzSlMobscPuiT94B6gh2ens8XpFg4ZidPbIoJ_61ydE
CC-139	S2FPC01 Brochure https://www.product.live/pdfviewer?url=https%3A%2F%2Fwww.product.live%2Fdatasheet%2Fsemiconductorsamsung%2FS2FPC01_POWER_I C.pdf
CC-140	Montage M88SPD5118 / DDR5 SPD Hub
CC-141	Renesas SPD5118 – SPD HUB for DDR5
CC-142	DDR5 SDRAM RDIMM Addendum, MTC40F204WS1RC – 96 Gb, 24Gb die Revision B, Micron (Jan. 2023)
CC-143	DDR5 SDRAM RDIMM Addendum, MTC20F208XS1RC – 48 Gb, 24Gb die Revision B, Micron (Jan. 2023)
CC-144	RDIMM Module Page, Samsung ("Samsung Module RDIMM") https://semiconductor.samsung.com/dram/module/rdimm/ (September 18, 2025)
CC-145	DDR5 MRDIMM: A Transformational Evolution For DDR5 DIMM, Semiconductor Engineering https://semiengineering.com/ddr5-mrdimm-a-transformational-evolution-for-ddr5-dimm/
CC-146	Samsung Memory Power IC https://semiconductor.samsung.com/power-ic/memory-power-ic/
CC-147	JEDEC Member List https://www.jedec.org/about-jedec/member-list
CC-148	AMD EXPO Self Certifications https://www.kingston.com/en/memory/validations/amd-expo-self-certifications
CC-149	DDR5 5600 MTs ECC RDIMM Product Page https://www.kingston.com/en/memory/server-premier/ddr5-5600mts-ecc-registered-dimm
CC-150	DDR5 5600 MTs ECC RDIMM Sample Specifications
CC-151	DDR5 6400 MTs ECC RDIMM Product Page https://www.kingston.com/en/memory/server-premier/ddr5-6400mts-ecc-registered-dimm
CC-152	DDR5 6400 MTs EC RDIMM Sample Specifications
CC-153	FURY Renegade Pro DDR5 Sample Specifications

CC-154	FURY Renegade Pro DDR5 RDIMM Product Page https://www.kingston.com/en/memory/gaming/fury-renegade-ddr5-pro-rdimm
CC-155	Public Version of JESD79-5D-v1.40 Proposal (DDR5 SDRAM) (Redacted in its Entirety)
CC-155C	Confidential Version of JESD79-5D-v1.40 Proposal (DDR5 SDRAM)
CC-156	JESD82-543 (DDR5MRCD03)
CC-157	Kingston DDR5 Memory Standard Article
CC-158	Kingston DDR5 Premier Server RDIMM
CC-159	Kingston Memory Modules Product Page https://www.kingston.com/en/memory
CC-160	Part Number Decoder https://www.kingston.com/en/memory/memory-part-number-decoder
CC-161	Rambus DDR5 RCD https://www.rambus.com/memory-interface-chips/ddr5-dimm-chipset/ddr5-rcd/
CC-162	SK Hynix 16GB DDR5 SDRAM Datasheet DDR5_H5CG4(8&6)MEBDX Rev1.1
CC-163	JESD305A
CC-164	Kingston DC3000 ME
CC-165	DC3000ME PCIe 5.0 NVMe U.2 SSD
CC-166	Public Version of 20261026_111528_TW253400145_post.log (Redacted in its Entirety)
CC-166C	Confidential Version of 20261026_111528_TW253400145_post.log
CC-167	Public Version of 20261026_105254_TW253400145_pre (Redacted in its Entirety)
CC-167C	Confidential Version of 20261026_105254_TW253400145_pre
CC-168	Kingston SMART Attribute Details (Kingston SMART Attribute)
CC-169	NVM Express Base Specification
CC-170	The Importance of Garbage Collection and TRIM processes for SSD performance, Kingston Technology (SSD-Garbage Collection and TRIM)

	https://www.kingston.com/unitedkingdom/en/blog/pc-performance/ssd-garbage-collection-trim-explained
CC-171	eMMC Life-Cycle Estimating, Validating & Monitoring, Kingston Technology (Kingston eMMC Life-Cycle) https://www.kingston.com/en/blog/embedded-and-industrial/emmc-lifecycle
CC-172	Understanding SSD Over-provisioning (OP), Kingston Technology (Kingston SSD Over-Provisioning) https://www.kingston.com/en/blog/pc-performance/overprovisioning
CC-173	NAND Flash Technology and Solid-State Drives (SSDs), Kingston Technology (Kingston NAND Flash and SSDs) https://www.kingston.com/en/blog/pc-performance/nand-flash-technology-and-ssd
CC-174	2D vs 3D NAND: Differences Between SLC, MLC, TLC and QLC Flash Storage, Kingston Technology (Kingston 2D vs 3D NAND) https://www.kingston.com/en/blog/pc-performance/difference-between-slc-mlc-tlc-3d-nand
CC-175	Marvell SSD Controllers https://www.marvell.com/products/ssd-controllers.html.
CC-176	SSD Controller, Definitions & Glossary, SP Industrial (SSD Definition) https://www.silicon-power.com/definition-detail/ssd-controller/
CC-177	Maintaining your SSD's health using SMART monitoring, Kingston Technology (Kingston SSD Health) https://www.kingston.com/en/blog/pc-performance/maintaining-ssds-health-smart-monitoring
CC-178	Public Version of Kingston Thermal Sensor Locations (Kingston Sensor Locations) (Redacted in its Entirety)
CC-178C	Confidential Version of Kingston Thermal Sensor Locations (Kingston Sensor Locations)
CC-179	Importation evidence for July 9, 2026 purchase of Micron DDR5 RDIMM (MTC20F2085S1RC48BAY)
CC-180	Importation evidence for July 9, 2026 purchase of Micron DDR5 MRDIMM (MTC20F2085S1HC88XD1)
CC-181	DDR5 SDRAM RDIMM Addendum (MTC10F1084S1RC – 16 GB, 16Gb Die Revision A)
CC-182	DDR5 SDRAM RDIMM Addendum (MTC20F1045S1RC – 32 GB, 16Gb Die Revision A)
CC-183	Advantech SK Hynix 16G RDIMM DDR5 5600MT/s, SQR-RD5N16G5K6HZZG
CC-184	16Gb B-die DDR5 SDRAM Rev. 1.7, Feb 2023 Datasheet (Samsung SDRAM Datasheet) https://uttc.com.tw/wp-

	content/uploads/2025/12/DatasheetDDR5_16G_B_X16_K4RAH165VB_Rev1.7-1.pdf/
CC-185	EE Times Comparing DDR5 Memory From Micron, Samsung, SK Hynix https://www.eetimes.com/comparing-ddr5-memory-from-micron-samsung-sk-hynix/
CC-186	DDR5 Signal Integrity in High-Speed Communication Boards, Eureka https://eureka.patsnap.com/report-ddr5-signal-integrity-in-high-speed-communication-boards
CC-187	ThinkSystem 7600 MAX Mixed Use NVMe PCIe 5.0 x4 SSDs Product Guide
CC-188	Scaling DRAM Technology to Meet Future Demands: Challenges and Opportunities: ISCA 2025 Tutorial, June 22, 2025 (Scaling DRAM Technology Presentation)
CC-189	Kingston Technology Server Premier DDR5 4800MT/s Registered DIMMs Receive Validation on 4th Gen Intel Xeon Scalable Processor (DDR5 4800MT/s Announcement)
CC-190	5RCD0148: DDR5 Register Command Address up to 4800MT/s (Renesas RCD01) https://www.renesas.com/en/products/5rcd0148?queryID=9ad7623f7562f2235b5b3e4ce52aabb0
CC-191	Renesas 5RCD0148HC3 Short-Form Datasheet
CC-192	RG5R256A1C0GBY Short-form Datasheet
CC-193	NVMe SSD Controller: PCIe, NAND, LDPC, PLP & Thermal Control, ICNavigator https://icnavigator.com/applications/data-center-servers/nvme-ssd-controller/
CC-194	Memory Interface Products, Renesas https://www.renesas.com/en/products/memory-logic/memory-interface-products?srsltid=AU7gw4WssUGrQkK4xZAEok2XuVTWkj4UqivvtLLXOsEns7lNMWRxoVg0#product-portfolio
CC-195	Montage M88DR5RCD01 Product Brief https://www.montage-tech.com/Memory_Interface/DDR5_Server/M88DR5RCD01
CC-196	Rambus Delivers Industry Leading Client Chipsets for Next Generation AI PC Memory Modules https://www.rambus.com/rambus-delivers-industry-leading-client-chipsets-for-next-generation-ai-pc-memory-modules/

CC-197	JESD82-511
CC-198	JESD82-514
CC-199	JESD82-515
CC-200	Montage M88DR5RCD01 Product Brief
CC-201	Rambus DDR5 RCD01 4800 MT/s Product Brief
CC-202	Rambus DDR5 RCD 5600 MT/s Product Brief
CC-203	Rambus DDR5 RCD03 6400 MT/s Product Brief
CC-204	M88MR5RCD01 Product Brief
CC-205	Kingston Glossary https://www.kingston.com/en/memory/kingston-glossary
CC-206	Rambus DDR5 DIMM Chipsets Guide https://www.rambus.com/blogs/complete-guide-to-ddr5-chipsets/
CC-207	Renesas Gen 3 RCD and Gen 1 CKD https://www.renesas.com/en/about/newsroom/renesas-introduces-industry-s-first-client-clock-driver-and-gen-3-rcd-enable-demanding-ddr5-client?srsltid=AU7gw4U9HmHC3x5-lhl8cR139A_c1bnG4cWGWpDsYLfj5nGlLvK7125n
CC-208	Kingston Server Memory Types https://www.kingston.com/en/blog/servers-and-data-centers/types-server-memory-impact-performance
CC-209	Kingston 2Rx4 DDR5 RDIMM https://media.kingston.com/kingston/product/DDR5_ECC_Registered_DIMM_x80_2R_x4_1-lg.jpg
CC-210	DDR5: Breaking the bandwidth barrier, Samsung https://semiconductor.samsung.com/news-events/tech-blog/ddr5-breaking-the-bandwidth-barrier/
CC-211	Antmicro RDIMM DDR5 Tester https://antmicro.com/blog/2023/07/open-source-data-center-rdimm-ddr5-tester-for-memory-vulnerability-research
CC-212	Kingston 1Rx4 DDR5 RDIMM https://media.kingston.com/kingston/product/DDR5_ECC_Registered_DIMM_x80_1R_x4_1-lg.jpg
CC-213	Kingston 1Rx8 DDR5 RDIMM https://media.kingston.com/kingston/product/DDR5_EC

	C_Registered_DIMM_x80_1R_x8_1-lg.jpg
CC-214	Kingston Technical Support https://www.kingston.com/en/support
CC-215	Renesas RCD04 RRG5004x-A00 Short-form Datasheet https://www.renesas.com/en/document/sds/rrg5004x-a00-short-form-datasheet?r=25572843
CC-216	Renesas RCD05 RRG5005x-B00 Short-form Datasheet https://www.renesas.com/en/document/sds/rrg5005x-b00-short-form-datasheet?r=25573893
CC-217	Montage DDR5 Server Products https://www.montage-tech.com/Memory_Interface/DDR5_Server
CC-218	KSM56R46BD4PMI-64HAI Memory Module Specifications
CC-219	KSM56R46BS4PMI-48HMI Memory Module Specifications
CC-220	KSM56R46BD8PMI-32HAI Memory Module Specifications
CC-221	KSM56R46BS8PMI-16HAI Memory Module Specifications
CC-222	DDR DRAM Samsung Semiconductor Global https://semiconductor.samsung.com/dram/ddr/
CC-223	Kingston 2Rx8 DDR5 RDIMM
CC-224	Samsung system LSI's DDR5 Solution https://image.semiconductor.samsung.com/image/samsung/p6/semiconductor/newsroom/tech-blog/ddr5/pc-contents-04.png?$ORIGIN_PNG$
CC-225	Rambus Spins DDR5 DIMM Interface ICs for Data Center Servers https://www.allaboutcircuits.com/news/rambus-spins-ddr5-dimm-interface-ics-for-data-center-servers/
CC-226	KSM56R46BD4-64HA Memory Module Specifications
CC-227	KSM56R46BD8-32MH Memory Module Specifications
CC-228	Renesas RCD03 RG5R364B0C0GBY Short-form Datasheet
CC-229	ThinkSystem PM9D3a Read Intensive NVMe PCIe 5.0 x4 SSDs Product Guide https://lenovopress.lenovo.com/lp2001.pdf
CC-230	PM9D3a_NVMe U.2 Datasheet v. 1.3 (2024) https://www.xfusion.com/wp-content/uploads/2025/11/PM9D3a-NVMe-U.2-Datasheet.pdf

CC-231	Public Version of 20261028_094126_S7RFNG0YA03226_pre.log (Redacted in its Entirety)
CC-231C	Confidential Version of 20261028_094126_S7RFNG0YA03226_pre.log
CC-232	Samsung PM9D3a Front
CC-233	PM9A3 SSD Datasheet https://www.ssd.group/wp-content/uploads/2022/07/PM9A3-NVMe-U.2-Datasheet_for-07_v1.4.pdf
CC-234	SSD Thermal Throttling, XDA Developers https://www.xda-developers.com/your-ssd-is-thermal-throttling-and-you-never-notice/
CC-235	SSD Temperature Range, KingSpec https://www.kingspectech.com/blogs/posts/ssd-temperature-range
CC-236	Public Version of Samsung_PM9D3a_Open_View (Redacted in its Entirety)
CC-236C	Confidential Version of Samsung_PM9D3a_Open_View
CC-237	Public Version of Samsung_PM9D3a_Open_Top_View (Redacted in its Entirety)
CC-237C	Confidential Version of Samsung_PM9D3a_Open_Top_View
CC-238	Samsung's PM9D3a Solid State Drive https://semiconductor.samsung.com/news-events/tech-blog/samsung-pm9d3a-solid-state-drive/
CC-239	Introduction to Flexible Data Placement - A New Era of Optimized Data Management ("FDP White Paper") https://download.semiconductor.samsung.com/resources/white-paper/FDP_Whitepaper_102423_Final.pdf
CC-240	Samsung Solid State Drive (SSD) White Paper ("Samsung SSD White Paper") https://download.semiconductor.samsung.com/resources/white-paper/Samsung_SSD_White_Paper.pdf
CC-241	Different Types of NAND Flash https://semiconductor.samsung.com/support/tools-resources/dictionary/semiconductors-101-part-2-different-types-of-nand-flash/
CC-242	NAND Flash Explained https://www.flexxon.com/nand-flash-explained/
CC-243	Samsung Magician Low Performance https://29783.livehelpnow.net/29783/kb/article/111163/samsung-magician-low-performance
CC-244	Inner Workings of the SSD https://semiconductor.samsung.com/support/tools-

	resources/dictionary/semiconductors-101-part-3-inner-workings-of-the-ssd/
CC-245	Samsung SSD 950 Pro M.2 Data Sheet https://semiconductor.samsung.com/resources/data-sheet/Samsung_SSD_950_PRO_Data_Sheet_Rev_1_2.pdf
CC-246	Public Version of Micron SSD 9550_Inside_1 (Redacted in its Entirety)
CC-246C	Confidential Version of Micron SSD 9550_Inside_1
CC-247	Features for Error Reporting, SMART, Log Pages, Failures and management capabilities in NVMe Architectures, NVM Express ("NVMe Architectures") https://nvmexpress.org/resource/features-for-error-reporting-smart-log-pages-failures-and-management-capabilities-in-nvme-architectures/
CC-248	Micron Technical Note, TN-FD-23: Calculating Write Amplification Factor Introduction ("Micron WAF Technical Note")
CC-249	Micron Technical Note, TN-29-19: NAND Flash 101 ("Micron NAND Flash Technical Note")
CC-250	Public Version of 20261030_114414_182611DAFFFD_pre.log (Redacted in its Entirety)
CC-250C	Confidential Version of 20261030_114414_182611DAFFFD_pre.log
CC-251	Public Version of 20261030_113627_482511436AE4_pre.log (Redacted in its Entirety)
CC-251C	Confidential Version of 20261030_113627_482511436AE4_pre.log
CC-252	Micron 9550 SSD Technical Product Specification https://assets.micron.com/adobe/assets/urn:aaid:aem:8c1e2b9b-d81a-45f0-9a9f-8edcd6c23ec9/renditions/original/as/9550-nvme-ssd-tech-prod-spec.pdf
CC-253	2450 PCIe NVMe NAND Flash SSD https://www.ssd.group/wp-content/uploads/2022/12/2450_nvme_ssd_draft_02172021.pdf
CC-254	ServerOrbit Micron 9550 https://serverorbit.com/mtfdlce15t3tha-1bk1dabyy-micron-15-36tb-nvme-ssd/?srsltid=AYCX9vIUr2v8nT8r0sE_EfNNolyozzaLqO9HU1nKWELsHaLMD9JYmy6m

CC-255	Micron 7600 SSD Technical Product Specification https://www.micron.com/content/dam/micron/global/public/products/storage/ssds/data-center/7600/7600-ssd-tech-spec.pdf
CC-256	Micron SSD 9550 Pro_Front
CC-257	Micron SSD 7600 Pro Front
CC-258	ThinkSystem 7600 PRO NVMe SSDs Product Guide (https://lenovopress.lenovo.com/lp2446.pdf)
CC-259	Public Version of 20261030_141919_SH234301372_pre.log (Redacted in its Entirety)
CC-259C	Confidential Version of 20261030_141919_SH234301372_pre.log
CC-260	DS_NVMe SSD N1974 Series_M V2.30
CC-261	Kingston Product Images
CC-262	Swissbit, Host Controlled Thermal Management (HCTM) for NVME SSDs (2025), https://www.swissbit.com/files/public/Documents/TechNotes/AN4105en_HCTM_for_NVMe.pdf
CC-263	Solidigm FAQs https://www.solidigm.com/support/faqs.html
CC-264	Solidigm Data Center SSD Guide - White Paper solidigm-data-center-ssd-troubleshooting-and-health-monitoring-guide.pdf https://sdmsdfwdriver.blob.core.windows.net/files/kba-gcc/maintenance-tools/ka-01879/solidigm-data-center-ssd-troubleshooting-and-health-monitoring-guide.pdf
CC-265	Solidigm SSD Temperature Sensors https://www.solidigm.com/support-page/installation-compatibility/ka-01679.html
CC-266	Solidigm SSD Protection and Maintenance https://www.solidigm.com/support-page/maintenance-tools/ka-00047.html
CC-267	Solidigm D7-PS1010 and D7-PS1030 Product Brief https://www.solidigm.com/content/dam/solidigm/en/site/products/data-center/product-briefs/ps1010-ps1030/solidigm-d7-ps1010-d7-ps1030-product-brief.pdf
CC-268	FlashDBA NAND Flash Program and Erase Cycles https://flashdba.com/2014/06/20/understanding-flash-blocks-pages-and-program-erases/

CC-269	Solidigm NAND Cell Levels Explained https://www.solidigm.com/support-page/installation-compatibility/ka-01854.html
CC-270	Dell Technologies NVMe and NVMe-oF Overview Tech Book https://infohub.delltechnologies.com/nl-nl/l/an-in-depth-overview-of-nvme-and-nvme-of/nvme-controllers/
CC-271	Public Version of 20261102_154132_PHCP4312001Q1P9AGN_pre.log (Redacted in its Entirety)
CC-271C	Confidential Version of 20261102_154132_PHCP4312001Q1P9AGN_pre.log
CC-272	Public Version of Micron SSD 9550_Inside_2 (Redacted in its Entirety)
CC-272C	Confidential Version of Micron SSD 9550_Inside_2
CC-273	Public Version of Micron SSD 7600_Inside_1 (Redacted in its Entirety)
CC-273C	Confidential Version of Micron SSD 7600_Inside_1
CC-274	Public Version of Micron SSD 7600_Inside_2 (Redacted in its Entirety)
CC-274	Confidential Version of Micron SSD 7600_Inside_2
CC-275	Netlist_NS1974_Packaging
CC-276	Public Version of Netlist_NS1974_Inside_2 (Redacted in its Entirety)
CC-276C	Confidential Version of Netlist_NS1974_Inside_2
CC-277	Solidigm_D7-PS1010 Packaging Front
CC-278	Public Version of Solidigm_D7-PS1010_Inside_1 (Redacted in its Entirety)
CC-278C	Confidential Version of Solidigm_D7-PS1010_Inside_1
CC-279	Liquid-cooled SSDs in the Age of AI (Liquid-cooled SSDs), Solidigm https://www.solidigm.com/products/technology/liquid-cooled-ssds-in-age-of-ai.html
CC-280	D7-PS1010, Solidigm https://www.solidigm.com/products/data-center/d7/ps1010.html
CC-281	Data Center, Solidigm https://www.solidigm.com/products/data-center.html

CC-282	Montage M88DR5RCD02 Product Brief
CC-283	Montage M88DR5RCD03 Product Brief
CC-284	Montage M88DR5RCD04 Product Brief
CC-285	M88MR5RCD01 (Gen1 DDR5 MRCD) https://www.montage-tech.com/Memory_Interface/DDR5_Server/M88MR5RCD01

APPENDIX LIST

Appendix	Description
A	Prosecution History of U.S. Patent No. 10,025,731
B	Certified Copy of the Prosecution History of U.S. Patent No. 12,675,407
C	Certified Copy of the Prosecution History of U.S. Patent No. 11,200,120
D	Certified Copy of the Prosecution History of U.S. Patent No. 11,914,481

I. INTRODUCTION

1. Complainant Netlist, Inc. ("Complainant" or "Netlist"), headquartered in Irvine, California, is a leading provider of high-performance modular computer memory solutions. Netlist is not a large company, but its technological contributions in the memory space have been massive. Netlist has a long history of being the first to market with disruptive new products, and its cutting-edge innovations form the basis of much of the memory technology found in servers and personal computers today. Some of Netlist's innovations, such as its distributed buffer architecture and its memory module having a mixture of volatile and non-volatile memories, were later adopted by the industry. If you have ever accessed data from a cloud server, chances are you have benefited from Netlist's technology.

2. For more than two decades, Netlist has developed and sold high-performance memory products to some of the world's largest computing companies. And Netlist continues to innovate in the computer memory space to this day. For example, the U.S. Patent and Trademark Office ("PTO") recently issued several new patents for novel inventions related to computer memory and storage, specifically in the area of dynamic random access memory ("DRAM") and NAND flash memory-based Solid-State Drives ("SSDs").

3. One of these inventions relates to designs for managing synchronized data communication for multiple groups of memory chips in Dual In-line Memory Modules ("DIMMs"). The patented invention improves the speed and signal integrity of DIMMs, which form the "backbone" of modern servers.

4. Another invention relates to designs for enhancing the performance of hybrid memory systems—that is, systems that have a mixture of volatile memory, such as DRAM, and non-volatile memory, such as NAND flash. Hybrid memory systems are used in enterprise-grade, commercial-grade, and industrial-grade SSDs to enhance performance and improve error handling

and fault tolerance. Like DIMMs, SSDs are used extensively in data centers, cloud computing, and high-performance computing due to their high-speed performance and low latency. And SSD adoption is expanding rapidly—driven by AI workloads and real-time analytics.

5. The Asserted Patents are assigned to Netlist and reflect its many years of research and development. And the technologies they cover are integral to DIMMs and SSDs—memory types that are ubiquitous today.

6. The computer memory industry as a whole has recognized Netlist's innovations. Indeed, all three of the world's largest memory manufacturers—SK hynix Inc. ("SK hynix"); Samsung Electronics Co., Ltd. ("Samsung"); and Micron Technology, Inc. ("Micron")—have licensed Netlist's patents, including the patents asserted here.

7. Netlist has previously brought its intellectual property disputes to the Commission after other efforts have failed to stop infringing activity. Indeed, it was only after Netlist brought ITC complaints against Samsung and Micron that those entities agreed to license Netlist's patents, including the patents asserted here. *See In re Certain Dynamic Random Access Memory (DRAM) Devices, Products Containing the Same, and Components Thereof* ("*Netlist I*"), Inv. No. 337-TA-1472; *In re Certain Dynamic Random Access Memory (DRAM) Devices, Products Containing the Same, and Components Thereof (II)* ("*Netlist II*"), Inv. No. 337-TA-1511; *In re Certain Dynamic Random Access Memory (DRAM) Devices, Products Containing the Same, and Components Thereof (III)* ("*Netlist III*"), Inv. No. 337-TA-1523; *In re Certain Dynamic Random Access Memory (DRAM) Devices, Products Containing the Same, and Components Thereof (IV)* ("*Netlist IV*"), Inv. No. 337-3939 (withdrawn pre-institution).

8. In an effort to avoid litigation, Netlist has approached Kingston (defined below). After repeated contacts, Kingston finally agreed to a meeting in December 2025. During the

December 3, 2025 meeting, Netlist presented its memory technologies to Kingston, illustrated Kingston's use of Netlist's technologies with exemplary claim charts, explained its proposed licensing framework, and disclosed to Kingston that Netlist was continuing to grow its patent portfolio through continuation practice. Netlist subsequently provided a copy of the presentation to Kingston and later offered Kingston a worldwide license to all Netlist patents.

9. Rather than license Netlist's patents, however, Kingston continues to purchase and assemble memory modules and SSDs that infringe Netlist's patents. Kingston then imports these memory modules and SSDs into the United States through its various subsidiaries, and sells those memory modules and SSDs in the United States through a variety of channels, including Kingston's own websites, U.S.-based distributors, third-party resellers, and online and retail stores. Kingston has not responded to Netlist's presentation of memory technologies or its licensing offer.

10. So Netlist must continue its efforts to protect its innovative intellectual property. Netlist thus respectfully files this Complaint under Section 337 of the Tariff Act of 1930, as amended, 19 U.S.C. § 1337, to stop the unlawful importation into the United States, sale for importation into the United States, and/or sale within the United States after importation of certain dynamic random access memory (DRAM) devices and NAND flash memory devices, products containing the same, and components thereof that infringe valid and enforceable patents owned by Netlist.

11. The Proposed Respondents are Kingston Technology Corp.; Kingston Technology Co., Inc.; Kingston Digital, Inc.; Kingston Technology Far East Corp.; Kingston Solutions, Inc.; Kingston Technology Co., Ltd.; Kingston Technology (Shanghai) Co. Ltd. (collectively, "Kingston" or the "Proposed Kingston Respondents"); Lenovo Group Ltd. ("Lenovo Group"); Lenovo (United States) Inc. ("Lenovo US"); Lenovo PC HK Ltd.; Lenovo (Beijing) Ltd.; Lenovo

Global Tech. (United States) Inc. (collectively, "Lenovo" or the "Proposed Lenovo Respondents"); CDW Corp.; CDW Logistics LLC (collectively, "CDW" or the "Proposed CDW Respondents"), Ingram Micro Inc. ("Ingram Micro" or the "Proposed Respondent Ingram Micro"); Insight Enterprises, Inc.; Insight Direct USA, Inc. (collectively, "Insight" or the "Proposed Insight Respondents"); and Zones, LLC ("Zones" or the "Proposed Respondent Zones") (with CDW, Ingram Micro, Insight, and Zones collectively referred to as "Proposed Distributor Respondents," and all respondents, collectively, referred to as the "Proposed Respondents"). Kingston designs, develops, manufactures, sells for importation, imports into the U.S., and/or sells after importation into the U.S. certain DRAM devices, specifically Double Data Rate 5 ("DDR5") Registered Dual In-line Memory Modules ("RDIMMs") and NAND flash memory devices, specifically SSDs, that infringe Netlist's Asserted Patents.

12. Kingston designs, develops, manufactures, sells for importation, imports into the U.S., and/or sells after importation into the U.S. certain DRAM and NAND devices that are branded with the Kingston brand or co-branded with various downstream customers, such as Lenovo. These downstream customers incorporate Kingston's infringing DRAM and NAND devices into their own devices, rebrand Kingston's infringing DRAM or NAND devices, or sell Kingston's infringing DRAM or NAND devices, as discussed below. The Proposed Distributor Respondents act as resellers and distributors, both for Kingston's infringing DRAM and NAND devices and for products that include Kingston's infringing DRAM and NAND devices inside of them.

13. This Complaint is based on the Proposed Respondents' unlawful acts regarding certain DRAM devices and NAND flash memory devices, products containing the same, and components thereof. The Accused Products include the following:

- Kingston DDR5 generation RDIMMs, including but not limited to:
    - Kingston Server Premier DDR5 RDIMMs, including but not limited to:
        - DDR5 6400MT/s RDIMMs;
        - DDR5 5600MT/s RDIMMs;
        - DDR5 4800MT/s RDIMMs; and
    - Kingston FURY Renegade Pro DDR5 RDIMMs.
- Lenovo products containing or rebranded from accused Kingston DDR5 RDIMMs;
- Products used or sold by the Proposed Distributor Respondents containing or rebranded from accused Kingston DDR5 RDIMMs;
- components thereof, including non-licensed DDR5 registering clock driver ("RCD") chips, synchronous dynamic random-access memory ("SDRAM") chips, and printed circuit boards;
- Kingston SSDs, including but not limited to:
    - Enterprise-grade SSDs, such as:
        - DC600M, DC2000B, and DC3000ME series SSDs; and
    - Commercial-grade SSDs, such as:
        - FURY Renegade and FURY Renegade G5 series SSDs;
        - KC600 and KC3000 series SSDs;
        - A400 series SSDs;
        - NV3 series SSDs; and
    - Industrial-grade SSDs, such as:
        - 2422 SSDs;
        - i-Temp SSDs;
        - 2230 SSDs;
        - 2280 SSDs;
        - mSATA SSDs; and

- 2.5-inch SSDs;

- Lenovo products containing or rebranded from accused Kingston SSDs;

- Products used or sold by the Proposed Distributor Respondents containing or rebranded from accused Kingston SSDs; and

- components thereof, including non-licensed SSD controllers, non-volatile random access memory ("NVRAM"), DRAM, sensors including temperature sensors, and printed circuit boards.

14. The Accused Products infringe one or more claims of the following Netlist patents (the "Patents"):

Asserted Patent	Claims Asserted Against Respondents (independent claims in bold)
Memory Module and Circuit Providing Load Isolation and Noise Reduction	
U.S. Patent No. 10,025,731 (the '731 Patent)	**1**–13, 16–18
Memory Module with Local Clock Signals	
U.S. Patent No. 12,675,407 (the '407 Patent)	**1**–5, **6**–10
Hybrid Memory System with Configurable Error Thresholds and Failure Analysis Capability	
U.S. Patent No. 11,200,120 (the '120 Patent)	**1**–12
U.S. Patent No. 11,914,481 (the '481 Patent)	**1**–15, 17–20

15. To stop the Proposed Respondents' unlawful acts, Netlist requests a limited exclusion order under 19 U.S.C. § 1337(d)(1) and permanent cease-and-desist orders under 19 U.S.C. § 1337(f).

16. Netlist further seeks the imposition of a bond upon importation of infringing products during the 60-day Presidential review period pursuant to 19 U.S.C. § 1337(j).

17. As set forth in Section X of this Complaint, a domestic industry pursuant to 19 U.S.C. § 1337(a)(2)–(3) exists, or in the alternative is in the process of being established, based

on the investments made by Netlist and its licensees SK hynix, Samsung, and Micron domestically in relation to products that are protected by the Asserted Patents.

II. COMPLAINANT

18. Netlist is a corporation organized and existing under the laws of the State of Delaware, having a principal place of business at 111 Academy Way, Suite 100, Irvine, CA 92617.

19. Since its founding in 2000, Netlist has been a leading provider of high-performance modular memory subsystems to the world's premier Original Equipment Manufacturers ("OEMs") in the server, high-performance computing, and communications markets. Netlist's technology enables users to derive useful information from vast amounts of data in a shorter period of time. These capabilities will become increasingly valuable as the volume of data continues to dramatically increase.

20. Netlist's technology integrates intelligence features, including innovations in load reduction, rank multiplexing, and failure prediction, with memory raw material—DRAM and NAND—to make memory perform at higher speeds with higher capacity, higher signal integrity, and better reliability.

21. Netlist has a long history of being the first to market with disruptive new products. As just one example, Netlist invented and introduced the first load-reduced dual in-line memory module ("LRDIMM"), HyperCloud, which utilized Netlist's patented distributed buffer architecture and patented signal correction technology. Years after Netlist invented the technology, the industry adopted Netlist's distributed buffer architecture for DDR4 generation LRDIMMs, the predominant high-end server memory module for the past several years. That same architecture and patented signal correction technology are also used in DDR5 generation RDIMMs.

22. While some inventions first started with LRDIMM architecture, they apply equally to other DDR5 memory modules, including RDIMMs. The patented signal correction technology

that Netlist invented is therefore embodied in the accused DDR5 DIMMs of the Proposed Respondents (discussed in more detail below), as well as DDR5 DIMMs manufactured and sold by Netlist and its licensees SK hynix, Samsung, and Micron (domestic industry products, also addressed in more detail below). One invention interposes correction circuits between the host and the DRAMs so that impedances can be dynamically controlled to improve signal integrity. Another provides programmable phase adjustments to each local clock signal sent to a respective group of DRAMs. Data centers are rapidly transitioning to DDR5 to support massive bandwidth requirements and AI workloads, as well as to benefit from enhanced reliability that DDR5 memory offers over its predecessors.

23. Netlist has also developed and patented innovative solutions used in hybrid-memory and non-volatile memory systems, such as SSDs, including hybrid-memory technologies that manage NAND flash reliability, protect data during power loss, and move data efficiently between DRAM and flash. One such innovative solution predicts failure and allows the memory system to have multiple levels of programmable reliability levels based on certain operating characteristics so that the system can react and remediate before fatal failures.

24. Netlist's foundational memory technologies are currently used by all three of the world's major memory suppliers—SK hynix, Samsung, and Micron, who collectively account for 85% of the world's DRAM supply. All three currently license Netlist's patents.

25. The claim charts submitted with this Complaint rely in part on functionality contained within certain standards issued by the JEDEC Solid State Technology Association. However, Netlist is not relying on essentiality to the standard to establish infringement by the Proposed Respondents. In particular, JEDEC standards do not require all limitations of any Asserted Claim. Accordingly, none of the Asserted Claims is standard-essential. Rather, Netlist

anticipates that its infringement positions will be further confirmed by evidence obtained through discovery from Respondents that is otherwise not publicly available.

III. THE PROPOSED RESPONDENTS

A. The Kingston Respondents

26. On information and belief, Kingston Technology Corporation ("Kingston Technology") is a corporation organized and existing under the laws of the state of California, with its principal place of business at 17600 Newhope Street, Fountain Valley, California 92708. On information and belief, Kingston Technology has a variety of subsidiaries located throughout the United States and the world, and is the worldwide parent corporation of Kingston Technology Co. Inc.; Kingston Digital, Inc.; Kingston Technology Far East Corp.; Kingston Solutions, Inc.; Kingston Technology Co., Ltd.; and Kingston Technology (Shanghai) Co. Ltd.

27. On information and belief, Kingston Technology Co., Inc. is a corporation organized and existing under the laws of the state of Delaware, with its principal place of business at 17600 Newhope Street, Fountain Valley, California 92708. On information and belief, Kingston Technology Co., Inc. is a wholly owned subsidiary of Kingston Technology.

28. On information and belief, Kingston Digital, Inc. is a corporation organized and existing under the laws of the state of Delaware, with its principal place of business at 17600 Newhope Street, Fountain Valley, California 92708. On information and belief, Kingston Digital, Inc. is a wholly owned subsidiary of Kingston Technology.

29. On information and belief, Kingston Technology Far East Corp. is a corporation organized and existing under the laws of Taiwan, with its principal place of business at No. 1-5, Li-Hsin Road, 1 Hsinchu Science Park, Hsinchu 300094, Taiwan. *See* **Exhibit 1**. On information and belief, Kingston Technology Far East Corp. is a wholly owned subsidiary of Kingston Technology.

30. On information and belief, Kingston Solutions, Inc. is a corporation organized and existing under the laws of Taiwan, with its principal place of business at 10F-6, No. 251, Fuxing 1st Street, Zhongxing Vil., Zhubei City, Hsinchu City, Taiwan 302052. On information and belief, Kingston Solutions, Inc. is a wholly owned subsidiary of Kingston Technology. *See* **Exhibits 2, 3**.

31. On information and belief, Kingston Technology Co., Ltd. is a corporation organized and existing under the laws of the People's Republic of China, with its principal place of business at Room 801, Tower C, Ocean Office Park, No. 5 Jinghua South Road, Chaoyang District, Beijing, China 100020. *See* **Exhibit 4**. On information and belief, Kingston Technology Co., Ltd. is a wholly owned subsidiary of Kingston Technology.

32. On information and belief, Kingston Technology (Shanghai) Co. Ltd. is a corporation organized and existing under the laws of the People's Republic of China, with its principal place of business at No. 1 Yinglun Road, Waigaoqiao Bonded Area, Free Trade Test Zone Shanghai, Shanghai, China, 200131. *See* **Exhibits 5, 6**. On information and belief, Kingston Technology (Shanghai) Co. Ltd. is a wholly owned subsidiary of Kingston Technology.

33. In November 2025, TrendForce named Kingston "the number one third-party supplier of SSDs in the channel for all of 2024. Based on the numbers provided by TrendForce, Kingston accounted for a massive 36 percent of the units shipped globally in 2024." *See* **Exhibit 7** at 1. And on September 28, 2026, Kingston announced that it had "been ranked the top third-party DRAM module supplier in the world," retaining "its number 1 position with an estimated 62% market share." **Exhibit 8** at 1.

34. On information and belief, the Proposed Kingston Respondents import into the United States, sell for importation into the United States, and/or sell within the United States after

importation certain DRAM devices and NAND flash memory devices, products containing the same, and components thereof (discussed in more detail below) that infringe one or more claims of the Asserted Patents. The Proposed Kingston Respondents are not licensed to the Asserted Patents.

B. The Lenovo Respondents

35. On information and belief, Lenovo Group Ltd. ("Lenovo Group") is a corporation organized and existing under the laws of Hong Kong, headquartered at 23rd Floor, Lincoln House Taikoo Place, 979 King's Road, Quarry Bay, Hong Kong, SAR, China, with a principal place of business located at Building 2, No. 10 Courtyard Xibeiwang East Road, Haidian District, 100094 Beijing, China; and its U.S.-based headquarters located at 8001 Development Drive, Morrisville, NC 27560, United States. **Exhibit 9**; **Exhibit 10**; **Exhibit 11** at 3.

36. On information and belief, Lenovo PC HK Ltd. is a corporation organized and existing under the laws of Hong Kong with its headquarters at 23rd Floor, Lincoln House, Taikoo Place, 979 King's Road, Quarry Bay, Hong Kong SAR, China. **Exhibit 11** (Lenovo Group Pitchbook) at 58.

37. On information and belief, Lenovo (Beijing) Ltd. is a corporation organized and existing under the laws of the People's Republic of China with its principal place of business at No. 10, Yard 10, Northwest Wang East Road, Haidian District, Beijing 100080, China. **Exhibit 11** (Lenovo Group Pitchbook) at 50–51.

38. On information and belief, Lenovo (United States) Inc. ("Lenovo US") is a corporation organized and existing under the laws of Delaware, with its principal place of business located at 8001 Development Drive, Morrisville, NC 27560, United States. **Exhibit 12** (Lenovo US Delaware Corporation Report); **Exhibit 13** (Lenovo US North Carolina Secretary of State

Record). Lenovo US is a wholly owned subsidiary of Lenovo Group Limited. **Exhibit 11** (Lenovo Group Pitchbook) at 55.

39. On information and belief, Lenovo Global Tech. (United States) Inc. is a corporation organized and existing under the laws of Delaware, with its principal place of business located at 8001 Development Drive, Morrisville, NC 27560, United States. **Exhibit 14** (Lenovo Global Tech US North Carolina Secretary of State Record).

40. On information and belief, Lenovo, itself and through its subsidiaries, designs, develops, manufactures, sells for importation, imports into the U.S., and/or sells after importation into the United States certain DRAM and NAND devices, and/or products containing the same, such as servers and computing systems, and/or components thereof. Upon information and belief, this is the primary nature of its business, specifically the design, development, manufacture, sale for importation, importation into the United States, and/or sale after importation of certain DRAM and NAND devices, and/or products containing the same, such as servers and computing systems, and/or components thereof, including in relation to Lenovo's server business. **Exhibit 15** (Lenovo Group 2025 Interim Report) at 49, 51; **Exhibit 16**.

C. The CDW Respondents

41. On information and belief, CDW Corp. is a corporation organized and existing under the laws of Delaware, with its principal place of business located at 200 N. Milwaukee Avenue, Vernon Hills, IL 60061, United States. **Exhibit 17** (CDW Feb. 20, 2026 10-K Report).

42. On information and belief, CDW Logistics LLC is a limited liability company organized and existing under the laws of Illinois, with its principal place of business located at 200 N. Milwaukee Avenue, Vernon Hills, IL 60061, United States. **Exhibit 18**.

43. CDW is an authorized reseller for Kingston in the United States. **Exhibit 19**. CDW's website advertises that it is a "Featured Partner" of Kingston, and "[o]ffering a full range

of SSD, DRAM and encrypted USB drives, Kingston provides quality components, rigorous testing and industry-leading warranties[]" and that CDW will "[m]eet all your memory and storage needs with Kingston and CDW." *See*, *e.g.*, **Exhibit 20**; **Exhibit 21** at 1.

44. On information and belief, CDW, directly and through its subsidiaries, sells for importation into the United States, imports into the United States, and/or sells after importation into the United States certain DRAM and NAND devices, products containing the same—including workstations, servers, and computing systems—and/or components thereof. Upon information and belief, selling and shipping hardware is a significant part of CDW's business, with hardware sales, including DRAM and NAND devices, representing over 70% of CDW's 2025 revenue. **Exhibit 17** (CDW Feb. 20, 2026 10-K Report) at 8. CDW operates two distribution centers in the United States—one in Vernon Hills, Illinois, and the other in North Las Vegas, Nevada—that, on information and belief, handle and ship millions of units annually. *Id.* at 6; **Exhibit 22**.

45. On information and belief, CDW leases data centers within the United States to support cloud-based computing solutions for its customers. **Exhibit 17** (CDW Feb. 20, 2026 10-K Report) at 50, 53–54. On information and belief, CDW provides server co-location, data backup, and storage services, which would require the use of DRAM and NAND devices. *Id.*

D. The Ingram Micro Respondent

46. On information and belief, Ingram Micro is a corporation organized and existing under the laws of Delaware, with its principal place of business located at 3351 Michelson Dr., Suite 100, Irvine, CA 92612, United States. **Exhibit 23** (Business Registration for Ingram Micro with State of California). Ingram Micro is a subsidiary of Ingram Micro Holding Corp. **Exhibit 24**.

47. Ingram Micro is an authorized distributor for Kingston in the United States. **Exhibit 19**. On information and belief, the two companies have maintained a strong relationship for decades that spans across several continents. In 2010, when Kingston appointed Ingram Micro India as a national distributor for its DRAM business in India, an executive from an Ingram Micro foreign subsidiary stated that "Kingston is a key vendor partner for Ingram Micro worldwide[.]" **Exhibit 25** at 1. Today, Ingram Micro affiliates are listed as authorized distributors for Kingston in countries around the world.

48. On information and belief, Ingram Micro, directly and through its subsidiaries and affiliates, imports into the United States, and/or sells after importation into the United States certain DRAM and NAND devices, products containing the same—including workstations, servers, and computing systems—and/or components thereof. Ingram Micro claims to be "one of the largest distributors, based on revenues, of technology hardware, software and services worldwide[.]" **Exhibit 26** (Ingram Micro Holding Corp. July 30, 2026 10-Q Report) at 31. On information and belief, the primary nature of Ingram Micro's business is to "buy, hold title to and sell technology products" to resellers. *Id.* at 12.

E. The Insight Respondents

49. On information and belief, Insight Enterprises, Inc. is a corporation organized and existing under the laws of Delaware, with its principal place of business located at 2701 East Insight Way, Chandler, AZ 85286, United States. **Exhibit 27** (Insight SEC 10-K 2025).

50. On information and belief, Insight Direct USA, Inc. is a corporation organized and existing under the laws of Illinois, with its principal place of business located at 2701 East Insight Way, Chandler, AZ 85286, United States. *See* Complaint at 2, *Insight Direct USA, Inc. v. KPC Healthcare, Inc.*, No. 30-2025-01531739-CU-CL-WJC (Cal. Super. Ct. Dec. 8, 2025).

51. Insight is an authorized reseller for Kingston in the United States. **Exhibit 19**. Insight's website has a specialized landing page for Kingston products, advertising that "Kingston® memory and storage products[]" are "available from Insight," offering "a full range of reliable, rigorously-tested Solid-State Drives (SSDs), DRAMs and USB drives[]" to its customers. **Exhibit 28** at 1.

52. On information and belief, Insight, directly and through its subsidiaries, sells for importation into the United States, imports into the United States, and/or sells after importation into the United States certain DRAM and NAND devices, products containing the same—including workstations, servers, and computing systems—and/or components thereof. Upon information and belief, selling and shipping hardware is a significant part of Insight's business, with hardware sales—including sales of DRAM and NAND devices—representing over 56% of Insight's 2025 revenue. **Exhibit 27** (Insight SEC 10-K 2025) at 86. Insight leases two distribution centers in the United States—one in Hanover Park, Illinois, and the other in Fort Worth, Texas—and, on information and belief, handle and ship millions of units annually. *Id.* at 22; *see also* **Exhibit 29**.

F. The Zones Respondent

53. On information and belief, Zones is a private company organized and existing under the laws of Washington, with its principal place of business located at 1102 15th Street SW, Suite 102, Auburn, WA 98001, United States. **Exhibit 30** (Washington State Corporations and Charities Filing System, Business Information).

54. Kingston is listed as a partner on Zones' website, **Exhibit 31**, advertising that "Kingston Technology offers a wide range of memory and storage solutions through the reliable services of Zones." **Exhibit 32** at 1. Kingston is also listed as a "Primary OEM Partner" for international Zones entities, like Zones Europe. **Exhibit 33**.

55. On information and belief, Zones, directly and through its subsidiaries, sells for importation into the United States, imports into the United States, and/or sells after importation into the United States certain DRAM and NAND devices, products containing the same—including workstations, servers, and computing systems—and/or components thereof. Upon information and belief, offering IT supply chain services is a significant part of Zones' business. **Exhibit 34**. As part of that business, Zones offers IT Freight and Shipping Management Services, Warehouse Management, and other Global Supply Chain services. *Id.* Zones advertises customized package delivery of IT assets "in and out of any country globally." **Exhibit 35** at 3.

56. On information and belief, Zones operates a number of facilities based in the United States that receive global shipments of computing products, including certain DRAM and NAND devices, products containing the same—including workstations, servers, and computing systems—and/or components thereof. Zones operates "Technology Solution Centers" based in the United States that offer inventory services, including kitting, labeling, and repair. *Id.* Zones operates a warehouse in Carol Stream, Illinois, and, on information and belief, operates data centers in New York which rely on systems that employ DRAM and NAND devices. **Exhibit 36**; **Exhibit 37**.

IV. THE TECHNOLOGY AND PRODUCTS AT ISSUE

57. The technology at issue generally relates to two types of memory used in computer systems for storing and processing information.

58. Most, if not all, modern computing products utilize memory modules. A memory module can be a printed circuit board that contains, among other components, multiple individual memory devices (such as DRAM packages or portions thereof) designed to interact with a host's memory controller external to the memory module. Modern memory modules often adopt the form of DIMMs. The memory devices on the memory module are typically arranged in "ranks," which

are accessible by a processor or memory controller of the host system. A memory module is typically installed into a memory slot on a computer motherboard.

59. Memory modules are designed for, among other things, use in servers such as those supporting cloud-based computing, AI, and other data-intensive applications. There are also memory modules designed primarily for the consumer market, such as for use in desktops and laptops. Memory modules are typically characterized by, among other things, the generation of DRAM on the module (e.g., DDR5, DDR4, DDR3) and the type of module (e.g., RDIMM, Unregistered Dual In-line Memory Module ("UDIMM"), or other configurations).

60. Additionally, many modern computer systems utilize SSDs for non-volatile[1] data storage and retrieval. An SSD can be a printed circuit board that contains, among other components, multiple individual non-volatile memory devices (such as NAND flash memory or portions thereof), as well as a controller chip and other chips, such as DRAM chips, designed to work in concert for writing and fetching data to and from non-volatile memory. An SSD is typically installed into a slot on the computer's motherboard or connected through data cables.

61. SSDs are designed for, among other things, use in servers such as those supporting cloud-based computing and other data-intensive applications, as well as in consumer applications such as PCs and laptops. SSDs are typically characterized by, among other things, their form factor and physical shape (e.g., 2.5-inch, M.2, enterprise, etc.), their interface and protocol (e.g., SATA, NVMe, PCIe 3.0, PCIe 4.0, PCIe 5.0, etc.), and the type of flash memory cell (e.g., single-level cell ("SLC"), multi-level cell ("MLC"), triple-level cell ("TLC"), and quad-level cell ("QLC")).

[1] Unlike volatile memory—such as DRAM—which does not retain information when a device loses electricity, non-volatile memory preserves information permanently or semi-permanently without needing a constant electrical charge to refresh the data. Non-volatile memory, such as the type used in SSDs, is used for long-term persistent storage of data, similar to magnetic storage media like hard drives.

62. Pursuant to Commission Rules §§ 210.10(b)(1) and 210.12(a)(12), the products accused of infringement are DRAM devices (specifically DDR5 generation DIMMs) and NAND flash memory devices (specifically enterprise-grade, commercial-grade, and industrial-grade SSDs), products containing the same (such as servers, workstations, computing systems, and storage systems), and components thereof.

63. The Accused Products include: Kingston DDR5 RDIMMs; products containing the same, such as servers and computing systems; and components thereof, including non-licensed DDR5 RCD chips, SDRAM chips, and printed circuit boards.

64. Complainant currently accuses the following exemplary Kingston RDIMM products (collectively, "Kingston Accused RDIMM Products"), Lenovo products containing or rebranded from the Kingston Accused RDIMM Products, and products sold by the Proposed Distributor Respondents containing or rebranded from the Kingston Accused RDIMM Products, that practice the technology claimed by the Asserted Patents: Kingston DDR5 RDIMMs, including, but not limited to, Kingston Server Premier DDR5 RDIMMs (e.g., DDR5 6400MT/s RDIMMs, DDR5 5600MT/s RDIMMs, and DDR5 4800MT/s RDIMMs) and Kingston FURY Renegade Pro DDR5 RDIMMs.

65. The Accused Products also include: Kingston NAND flash memory devices, including enterprise-grade, commercial-grade, and industrial-grade SSDs; and/or products containing the same, such as servers and computing systems; and/or components thereof, including non-licensed SSD controllers, NVRAM, DRAM, sensors, including temperature sensors, and printed circuit boards.

66. Complainant currently accuses the following exemplary Kingston SSD products (collectively, "Kingston Accused SSD Products"), Lenovo products containing the Kingston

Accused SSD Products, and products sold by the Proposed Distributor Respondents containing the Kingston Accused SSD Products, that practice the technology claimed by the Asserted Patents: Kingston NAND flash memory devices, including, but not limited to, Kingston DC600M, DC2000B, and DC3000ME series enterprise-grade SSDs; Kingston FURY Renegade and FURY Renegade G5 series commercial-grade SSDs; Kingston KC600 and KC3000 series commercial-grade SSDs; Kingston A400 series commercial-grade SSDs; Kingston NV3 series commercial-grade SSDs; Kingston 2422 industrial-grade SSDs; Kingston i-Temp industrial-grade SSDs; Kingston 2230 industrial-grade SSDs; Kingston 2280 industrial-grade SSDs; Kingston mSATA industrial-grade SSDs; and Kingston 2.5-inch industrial-grade SSDs.

V. THE PATENTS AND NON-TECHNICAL DESCRIPTIONS OF THE INVENTIONS[2]

A. U.S. Patent No. 10,025,731

1. Identification and Ownership of the '731 Patent

67. The '731 Patent was duly and lawfully issued by the U.S. PTO on July 17, 2018.

68. The '731 Patent issued from Application No. 14/715,491, filed May 18, 2015. The '731 Patent is entitled to a priority date of April 14, 2008.

69. The '731 Patent is set to expire on June 30, 2029.

70. The '731 Patent is titled "Memory Module and Circuit Providing Load Isolation and Noise Reduction" and names Hyun Lee, Jayesh R. Bhakta, Jeffrey C. Solomon, Mario Jesus Martinez, and Chi-She Chen as inventors.

71. A true and correct copy of the '731 Patent is attached as **Exhibit 38**.

[2] All non-technical descriptions of the patent herein are presented to give a general background of the patent. These statements are not intended for, nor should they be used for, purposes of patent claim construction. Netlist provides these statements subject to and without waiver of its right to argue that no claim construction is necessary, or that claim terms should be construed in a particular way under claim interpretation jurisprudence and the relevant evidence.

72. A true and correct copy of the patent assignment record for the ’731 Patent, from the named inventors ultimately to Netlist, is attached as **Exhibit 39**.

73. A true and correct copy of the prosecution history of the ’731 Patent is included as **Appendix A**.

2. Foreign Counterparts to the ’731 Patent

74. **Exhibit 40** lists each foreign patent, each foreign or domestic patent application (not already issued as a patent), and each foreign or domestic patent application that has been denied, abandoned, or withdrawn, if any, corresponding to the ’731 Patent, with an indication of the prosecution status of each such patent application.

75. No other foreign or domestic patents or applications corresponding to the ’731 Patent have been filed, abandoned, withdrawn, or rejected.

3. Non-Technical Description of the ’731 Patent

76. The ’731 Patent discloses a memory module that includes signal correction circuits, each including at least one programmable impedance matching circuit, to correct signals transmitted to and from the module’s memory devices. The claimed correction circuitry can reduce signal noise due to impedance mismatch in the system, enabling the claimed memory modules to provide stable, reliable signals at high data rates.

B. U.S. Patent No. 12,675,407

1. Identification and Ownership of the ’407 Patent

77. The ’407 Patent was duly and lawfully issued by the U.S. PTO on July 7, 2026.

78. The ’407 Patent issued from Application No. 18/935,410, filed November 1, 2024. The ’407 Patent is entitled to a priority date of July 27, 2013.

79. The ’407 Patent is set to expire on July 28, 2034.

80. The ’407 Patent is titled “Memory Module With Local Clock Signals” and names Hyun Lee and Jayesh R. Bhakta as inventors.

81. A true and correct copy of the ’407 Patent is attached as **Exhibit 41**.

82. A true and correct copy of the patent assignment record for the ’407 Patent, from the named inventors ultimately to Netlist, is attached as **Exhibit 42**.

83. A true and correct copy of the prosecution history of the ’407 Patent is included as **Appendix B**.

2. Foreign Counterparts to the ’407 Patent

84. **Exhibit 40** lists each foreign patent, each foreign or domestic patent application (not already issued as a patent), and each foreign or domestic patent application that has been denied, abandoned, or withdrawn, if any, corresponding to the ’407 Patent, with an indication of the prosecution status of each such patent application.

85. No other foreign or domestic patents or applications corresponding to the ’407 Patent have been filed, abandoned, withdrawn, or rejected.

3. Non-Technical Description of the ’407 Patent

86. The ’407 Patent discloses a memory module operable in a computer system having a memory controller and a system bus and comprises memory devices organized in a plurality of groups, and one or more circuits coupled to the memory devices. The circuits include circuitry configurable to receive from the memory controller a system clock and input control and address (C/A) signals, and to generate a module clock signal and module C/A signals in response to the system clock and input C/A signals. The circuitry is further configurable to generate a plurality of local clock signals corresponding, respectively, to the plurality of groups of memory devices, and to output the plurality of local clock signals to respective groups of the memory devices. A respective local clock signal has a respective phase relationship with the system clock signal that

can be programmed independently of other local clock signals and is output to a corresponding group of the memory devices.

C. U.S. Patent No. 11,200,120

1. Identification and Ownership of the ’120 Patent

87. The ’120 Patent was duly and lawfully issued by the U.S. PTO on December 14, 2021.

88. The ’120 Patent issued from Application No. 16/517,210, filed July 19, 2019. The ’120 Patent is entitled to a priority date of March 15, 2013.

89. The ’120 Patent is set to expire on March 21, 2035.

90. The ’120 Patent is titled “Hybrid Memory System With Configurable Error Thresholds and Failure Analysis Capability” and names Scott H. Milton, Jeffrey C. Solomon, and Kenneth S. Post as inventors.

91. A true and correct copy of the ’120 Patent is attached as **Exhibit 43**.

92. A true and correct copy of the patent assignment record for the ’120 Patent, from the named inventors ultimately to Netlist, is attached as **Exhibit 44**.

93. A true and correct copy of the prosecution history of the ’120 Patent is included as **Appendix C**.

2. Foreign Counterparts to the ’120 Patent

94. **Exhibit 40** lists each foreign patent, each foreign or domestic patent application (not already issued as a patent), and each foreign or domestic patent application that has been denied, abandoned, or withdrawn, if any, corresponding to the ’120 Patent, with an indication of the prosecution status of each such patent application.

95. No other foreign or domestic patents or applications corresponding to the ’120 Patent have been filed, abandoned, withdrawn, or rejected.

3. Non-Technical Description of the ’120 Patent

96. The ’120 Patent discloses a health-monitoring system for NAND flash or other non-volatile memory that allows the computer or memory manufacturer to set different threshold values for operating parameters based on the desired level of reliability. The system tracks operating parameters and compares them against configurable thresholds, taking certain actions depending on which threshold is reached. In practical terms, the ’120 Patent describes an adjustable early-warning system for storage memory that helps prevent data loss while allowing the same memory technology to be configured differently depending on different applications and device designs.

D. U.S. Patent No. 11,914,481

1. Identification and Ownership of the ’481 Patent

97. The ’481 Patent was duly and lawfully issued by the U.S. PTO on February 27, 2024.

98. The ’481 Patent issued from Application No. 18/154,500, filed January 13, 2023. The ’481 Patent is entitled to a priority date of March 15, 2013.

99. The ’481 Patent is set to expire on March 21, 2035.

100. The ’481 Patent is titled “Hybrid Memory System With Configurable Error Threshold and Failure Analysis Capability” and names Scott H. Milton, Jeffrey C. Solomon, and Kenneth S. Post as inventors.

101. A true and correct copy of the ’481 Patent is attached as **Exhibit 45**.

102. A true and correct copy of the patent assignment record for the ’481 Patent, from the named inventors ultimately to Netlist, is attached as **Exhibit 44**.

103. A true and correct copy of the prosecution history of the ’481 Patent is included as **Appendix D**.

2. Foreign Counterparts to the ’481 Patent

104. **Exhibit 40** lists each foreign patent, each foreign or domestic patent application (not already issued as a patent), and each foreign or domestic patent application that has been denied, abandoned, or withdrawn, if any, corresponding to the ’481 Patent, with an indication of the prosecution status of each such patent application.

105. No other foreign or domestic patents or applications corresponding to the ’481 Patent have been filed, abandoned, withdrawn, or rejected.

3. Non-Technical Description of the ’481 Patent

106. The ’481 Patent discloses a memory-management system that monitors the health of non-volatile memory, such as NAND flash storage, and uses adjustable reliability settings to decide how the system should respond as operating conditions or error accumulations change. The system can apply multiple programmable thresholds as related to one or more portions of the non-volatile memory, allowing an initial response, such as issuing a warning, when the memory begins to deteriorate, and a stronger response, such as marking the affected area unusable or taking corrective action, if reliability worsens. These thresholds can be selected for the needs of a particular computer or application and may also be adjusted based on the system’s observed operation over time. In practical terms, the ’481 Patent discloses a customizable, graduated approach to identifying and managing failing storage memory before the errors threaten the reliability of stored data.

VI. LICENSES

107. Pursuant to Commission Rule 210.12(a)(9)(iii), an identification of licensee(s) to the Asserted Patents is provided in **Confidential Exhibit 46C**. To Netlist’s knowledge, there are no other licensed entities to the Asserted Patents other than those listed in **Exhibit 46C**.

VII. THE PROPOSED RESPONDENTS' INFRINGEMENT OF THE PATENTS

108. As discussed above, the Accused Products are certain DRAM devices and certain NAND flash memory devices, products containing the same, and components thereof that infringe one or more claims of the Asserted Patents.[3] Representative claim charts, attached as **Exhibits 47–50C**, demonstrate that the Accused Products practice at least one claim of the Asserted Patents.

A. Infringement of U.S. Patent No. 10,025,731

109. On information and belief, the Proposed Respondents infringe, either literally or under the doctrine of equivalents, at least claims 1–13 and 16–18 of the '731 Patent by importing the Accused Products, selling the Accused Products for importation, and/or selling the Accused Products within the United States after importation.

110. Exemplary claim charts comparing independent claim 1 of the '731 Patent to representative Accused Products are attached as **Exhibit 47**.

B. Infringement of U.S. Patent No. 12,675,407

111. On information and belief, the Proposed Respondents infringe, either literally or under the doctrine of equivalents, at least claims 1–5 and 6–10 of the '407 Patent by importing the Accused Products, selling the Accused Products for importation, and/or selling the Accused Products within the United States after importation.

112. Exemplary claim charts comparing independent claims 1 and 6 of the '407 Patent to representative Accused Products are attached as **Exhibit 48**.

C. Infringement of U.S. Patent No. 11,200,120

113. On information and belief, the Proposed Respondents infringe, either literally or under the doctrine of equivalents, at least claims 1–12 of the '120 Patent by importing the Accused

[3] Samples of the Accused Products will be produced during the course of the investigation.

Products, selling the Accused Products for importation, and/or selling the Accused Products within the United States after importation.

114. Exemplary claim charts comparing independent claim 1 of the ’120 Patent to representative Accused Products are attached as **Confidential Exhibit 49C**.

D. Infringement of U.S. Patent No. 11,914,481

115. On information and belief, the Proposed Respondents infringe, either literally or under the doctrine of equivalents, at least claims 1–15 and 17–20 of the ’481 Patent by importing the Accused Products, selling the Accused Products for importation, and/or selling the Accused Products within the United States after importation.

116. Exemplary claim charts comparing independent claim 1 of the ’481 Patent to representative Accused Products are attached as **Confidential Exhibit 50C**.

E. Indirect Infringement

117. On information and belief, the Proposed Respondents also indirectly infringe the Asserted Patents by inducing and contributing to infringement. On information and belief, the Proposed Kingston Respondents had actual knowledge of the Asserted Patents as early as December 3, 2025, and no later than October 29, 2026. On December 3, 2025, Netlist met with Kingston (at Netlist’s office) and presented its memory technologies to Kingston, explaining that Netlist was continuing to grow its patent portfolio through continuation practice. Additionally, Netlist provided a copy of the presentation to Kingston on December 23, 2025, summarizing the key points of the meeting.[4] On October 29, 2026, Netlist sent Kingston yet another letter, reiterating its willingness to license.

[4] Although the ’407 Patent issued after the December 3, 2025 meeting, Netlist discussed with Kingston its broad patent portfolio, including the application that was subsequently issued as the

118. On information and belief, the Proposed Lenovo Respondents had actual knowledge of the '731 and '407 patents as early as August 10, 2026, when Complainant filed *Certain Dynamic Random Access Memory (DRAM) Devices, Products Containing the Same, and Components Thereof (III)* ("*Netlist III*"), Inv. No. 337-TA-1523, before the ITC alleging that the Proposed Lenovo Respondents infringed the Asserted '731 and '407 patents, among other patents, on the basis of DRAM devices manufactured by Micron Technology, Inc. and Micron Semiconductor Products, Inc. (collectively, "Micron").

119. On information and belief, the Proposed Respondents were aware of the Asserted Patents or acted with willful blindness as to their existence as of the date of filing this Complaint.

120. On information and belief, the Proposed Respondents knowingly and intentionally induce users of one or more of the Accused Products to directly infringe one or more claims of the Asserted Patents by encouraging, instructing, and aiding one or more persons in the United States to make, use (including testing), sell, or offer to sell one or more of the Accused Products, during or after such articles' importation into the United States, in a manner that directly infringes the Asserted Patents.

121. On information and belief, the Proposed Respondents contribute to the infringement of the Asserted Patents by offering to sell, selling, or importing a patented component, material, or apparatus used to practice a patented process, constituting a material part of the invention, knowing the same to be especially made or especially adapted for use in an act of infringement and not a staple article or commodity of commerce suitable for substantial non-infringing uses.

'407 Patent. Accordingly, Kingston would have had constructive notice of the patent on the date of issue.

122. For example, the Proposed Respondents provide significant support and documentation, such as specifications, data sheets, manuals, product briefs, guides, webpages, instructional videos and/or other materials that demonstrate how the Accused Products can be used in an infringing manner and encourage and facilitate infringing use of the DDR5 RDIMMs and SSDs by users in a manner that Kingston knows or should have known would result in infringement and with the intent of inducing infringement. *See, e.g.*, **Exhibits 51**–**63**.

VIII. SPECIFIC INSTANCES OF UNFAIR IMPORTATION AND SALE

123. On information and belief, the Accused Products are manufactured overseas and then sold for importation into the United States by the Proposed Respondents or on their behalf, imported into the United States by Proposed Respondents or on their behalf, and/or sold after importation by Proposed Respondents or on their behalf.

124. The Accused Products include the following:

- Kingston DDR5 generation RDIMMs, including but not limited to:
    - Kingston Server Premier DDR5 RDIMMs, including but not limited to:
        - DDR5 6400MT/s RDIMMs;
        - DDR5 5600MT/s RDIMMs;
        - DDR5 4800MT/s RDIMMs; and
    - Kingston FURY Renegade Pro DDR5 RDIMMs.
- Lenovo products containing or rebranded from accused Kingston DDR5 RDIMMs;
- Products used or sold by the Proposed Distributor Respondents containing or rebranded from accused Kingston DDR5 RDIMMs;
- components thereof, including non-licensed DDR5 RCD chips, SDRAM chips, and printed circuit boards;
- Kingston SSDs, including:
    - Enterprise-grade SSDs, such as:

        - DC600M, DC2000B, and DC3000ME series SSDs; and
    - Commercial-grade SSDs, such as:
        - FURY Renegade and FURY Renegade G5 series SSDs;
        - KC600 and KC3000 series SSDs;
        - A400 series SSDs;
        - NV3 series SSDs; and
    - Industrial-grade SSDs, such as:
        - 2422 SSDs;
        - i-Temp SSDs;
        - 2230 SSDs;
        - 2280 SSDs;
        - mSATA SSDs; and
        - 2.5-inch SSDs;
- Lenovo products containing or rebranded from accused Kingston SSDs;
- Products used or sold by the Proposed Distributor Respondents containing or rebranded from accused Kingston SSDs; and
- components thereof, including non-licensed SSD controllers, NVRAM, DRAM, sensors including temperature sensors, and printed circuit boards.

A. Kingston

125. On information and belief, the Proposed Kingston Respondents sell the accused DIMMs and SSDs through a variety of channels, including their own websites, U.S.-based distributors, and other third-party sellers and resellers, knowing that these entities intend to make, use, offer to sell, and/or sell the Accused Products within the United States and/or import the products into the United States in an infringing manner. *See, e.g.*, **Exhibits 19**, **64–65**.

126. Kingston advertises that it has "more than 63 state-of-the-art Surface Mount Technology (SMT) lines that produce more than seventeen million customized modules of DRAM / Flash and SSD products each month for servers, desktops, laptops, workstations" and other devices. **Exhibit 66** at 2. On information and belief, the Accused Products are manufactured and tested in Taiwan and China. *See* **Exhibit 67**; *see also* **Exhibit 68** at 1 (describing a tour of a Kingston manufacturing facility in Taiwan for SSDs); **Exhibit 69** (Forbes stating that Kingston "operates manufacturing facilities in Taiwan, China and Fountain Valley, Calif.").

127. In 2005, "Kingston open[ed] the world's largest memory module manufacturing facility in Shanghai, China." **Exhibit 70** at 3. Since that time, "most [of Kingston's] production has shifted to their overseas production facilities in China, Taiwan and Malaysia[.]" **Exhibit 71** at 3 (explaining that "all factories, overseas or not, are built to the same exact standards, operated in the exact same way, and use the exact same components sourced from the exact same companies").

128. Examples of the currently available DDR5 RDIMMs found on Kingston's website are attached hereto as **Exhibits 232**–**235**.

129. Examples of the currently available SSDs found on Kingston's website are attached hereto as **Exhibits 57**, **236**–**241**.

130. **Exhibit 72** includes receipts for the domestic purchase of an accused Kingston DDR5 RDIMM, part number KSM56R46BD8-32MH, purchased on October 12, 2026, after the issuance of the '407 Patent. The purchased DDR5 RDIMM is labeled as being assembled in Taiwan. *Id.* The order and shipping paperwork indicate that the product was shipped to an address within the United States, demonstrating that the Proposed Respondents import the product, sell it for importation, and/or sell it within the United States after importation. *Id.* This previously

purchased product is still being sold by Kingston and is the same as the DDR5 RDIMM products that are currently available on Kingston's present-day website. **Exhibit 73**.[5]

131. **Exhibit 74** includes receipts for the domestic purchase of an accused Kingston DDR5 RDIMM, specifically Kingston Server Premier DDR5, part number KSM56R46BD4-64HA, purchased on August 20, 2026, after the issuance of the '407 Patent. The purchased DDR5 RDIMM is labeled as being assembled in Taiwan. *Id.* The order and shipping paperwork indicate that the product was shipped to an address within the United States, demonstrating that the Proposed Respondents import the product, sell it for importation, and/or sell it within the United States after importation. *Id.* This previously purchased KSM56R46BD4-64HA Kingston Server Premier DDR5 product is listed on Kingston's website as being replaced by part number KSM56R46BD4-64MH, which is available for sale on Kingston's present-day website. **Exhibits 75–76**.

132. The online computer hardware retailer Newegg is an authorized retailer for Kingston. **Exhibit 19**. Newegg lists several Kingston SSDs and provides the country of origin for those SSDs. For example, the Kingston NV3 500GB M.2 2280 NVMe SSD (Kingston part number SNV3S/500G) lists China as the country of origin. **Exhibit 77** (last visited Oct. 16, 2026).

133. **Exhibit 78** includes receipts for the domestic purchase of an accused Kingston SSD, part number SEDC3000ME/3T8, purchased on September 30, 2026. The purchased SSD is labeled as being assembled in Taiwan. *Id.* The order and shipping paperwork indicate that the product was shipped to an address within the United States, demonstrating that the Proposed Respondents import the product, sell it for importation, and/or sell it within the United States after

[5] The process of obtaining additional DIMM and SSD product samples is ongoing. Complainant expects to supplement the Complaint shortly with samples once they are obtained.

importation. *Id.* This previously purchased product is still being sold by Kingston and is the same as SSD products that are currently available on Kingston's present-day website. **Exhibit 79**.

134. **Exhibit 80** includes receipts for the domestic purchase of an accused Kingston SSD, part number SEDC2000BM8/480G, purchased on October 16, 2026. The purchased SSD is labeled as being assembled in Taiwan. *Id.* The order and shipping paperwork indicate that the product was shipped to an address within the United States, demonstrating that the Proposed Respondents import the product, sell it for importation, and/or sell it within the United States after importation. *Id.* This previously purchased product is still being sold by Kingston and is the same as SSD products that are currently available on Kingston's present-day website. **Exhibit 81**.

135. **Exhibit 82** includes receipts for the domestic purchase of an accused Kingston SSD, part number SNV3S/500G, purchased on October 16, 2026. The purchased SSD is labeled as being assembled in Taiwan. *Id.* The order and shipping paperwork indicate that the product was shipped to an address within the United States, demonstrating that the Proposed Respondents import the product, sell it for importation, and/or sell it within the United States after importation. *Id.* This previously purchased product is still being sold by Kingston and is the same as SSD products that are currently available on Kingston's present-day website. **Exhibit 83**.

136. **Exhibit 84** includes receipts for the domestic purchase of an accused Kingston SSD, part number SFYR2S/1T0, purchased on October 16, 2026. The purchased SSD is labeled as being assembled in Taiwan. *Id.* The order and shipping paperwork indicate that the product was shipped to an address within the United States, demonstrating that the Proposed Respondents import the product, sell it for importation, and/or sell it within the United States after importation. *Id.* This previously purchased product is still being sold by Kingston and is the same as SSD

products that are currently available on Kingston's present-day website. **Exhibit 85** (stating SFYR2S/1T0 may be purchased from CDW).

137. **Exhibit 86** includes receipts for the domestic purchase of an accused Kingston SSD, part number SKC3000D/4096G, purchased on October 16, 2026. The purchased SSD is labeled as being assembled in Taiwan. *Id.* The order and shipping paperwork indicate that the product was shipped to an address within the United States, demonstrating that the Proposed Respondents import the product, sell it for importation, and/or sell it within the United States after importation. *Id.* This previously purchased product is still being sold by Kingston and is the same as SSD products that are currently available on Kingston's present-day website. **Exhibit 87** (stating SKC3000D/4096G may be purchased from CDW).

138. **Exhibit 88** includes receipts for the domestic purchase of an accused Kingston SSD, part number SFYRSK/1000G, purchased on October 19, 2026. The purchased SSD is labeled as being assembled in Taiwan. *Id.* The order and shipping paperwork indicate that the product was shipped to an address within the United States, demonstrating that the Proposed Respondents import the product, sell it for importation, and/or sell it within the United States after importation. *Id.*

B. Lenovo

139. On information and belief, the Proposed Lenovo Respondents are importing, selling for importation, and/or selling within the United States after importation, certain DRAM or NAND devices, and/or products containing the same, such as servers and computing systems, and/or components thereof, as well as rebranding and reselling the Accused Products. The specific instance set forth below is a representative example of Lenovo's unlawful importation, sale for importation, and/or sales within the U.S. after importation of infringing products.

140. **Exhibit 89** includes receipts for the domestic purchase of an accused dual-branded Kingston/Lenovo DDR5 RDIMM, part number LV48R40BD8HA-32IIMI, Lenovo Part Number SM37B82086, purchased on August 25, 2026, after the issuance of the '407 Patent. The purchased DDR5 RDIMM is labeled as being assembled in China. *Id.* The order and shipping paperwork indicate that the product was shipped to an address within the United States, demonstrating that the Proposed Respondents import the product, sell it for importation, and/or sell it within the United States after importation. *Id.*

141. On information and belief, the Proposed Lenovo Respondents manufacture and assemble products that contain Kingston Accused Products. Kingston designs certain DDR5 RDIMM memory modules specifically for use in computing systems manufactured by Lenovo. **Exhibit 90**; **Exhibit 91** at 2 (advertising "system-specific memory for servers branded by Cisco, Dell, HPE, or Lenovo[] . . ."). On information and belief, Kingston DDR5 RDIMMs designed for use in Lenovo systems include at least the following products: KTL-TS548D4-64G; KTL-TS548D4-64G; KTL-TS548S4-32G; KTL-TS548S8-16G; KTL-TS556S4-32G; KTL-TS556S4-48G; KTL-TS556S8-16G; KTL-TS556S8-24G; KTL-TS556D4-64G; KTL-TS556D4-96G; KTL-TS556D8-32G; KTL-TS556D8-48G; KTL-TS654D4-128G; KTL-TS564D4-64G; KTL-TS564D4-96G; KTL-TS564D8-32G; and KTL-TS564S8-16G.

142. Kingston also advertises several of its DDR5 RDIMM products and SSD devices as being compatible with Lenovo products, including Lenovo ThinkStation P Series Workstations, **Exhibit 92**, and rack servers like the ThinkSystem SR630 V4. **Exhibit 93**.

143. On information and belief, Kingston is one of Lenovo's suppliers, as evidenced by Lenovo's list of manufacturing sites and suppliers as of February 2026, which lists China-based Kingston Technology (Shanghai) Co. Ltd. and Taiwan-based Kingston Technology Far East Corp.

as memory suppliers. **Exhibit 94** at 25–26. On information and belief, Kingston continues to supply Lenovo and other downstream customers with the Accused Products, which are then imported into the United States. *See*, *e.g.*, **Exhibits 95–96**.

C. CDW

144. On information and belief, the Proposed CDW Respondents are importing, selling for importation, and/or selling within the U.S. after importation, certain DRAM or NAND devices, products containing the same—including workstations, servers and computing systems—and/or components thereof.

145. On information and belief, CDW purchases Kingston memory products to resell and distribute in the United States. On its website, CDW lists Kingston as a "Featured Partner," **Exhibit 20**, and advertises that "Kingston and CDW" will "[m]eet all your memory and storage needs with Kingston and CDW[]" "[o]ffering a full range of SSD [and] DRAM[.]" **Exhibit 21** at 1. CDW's Kingston webpage showcases Kingston-branded products with links to Kingston enterprise SSDs and other Accused Products and links to various Kingston-branded flyers. *See*, *e.g.*, *id.*; **Exhibit 97**.

146. On information and belief, CDW sells Kingston DDR5 DIMMs on its website, including at least two of the Kingston Accused RDIMM Products—KF564R32RBEK8-128 and KF564R32RBE2K4-128. **Exhibit 98**; **Exhibit 99**. As of October 21, 2026, these items were listed as backordered, but CDW states on its website that the items will ship once they are in stock. CDW also sells Kingston Accused SSD Products on its website. These products include enterprise SSDs, **Exhibit 100** (SEDC3000ME/15T3), and commercial SSDs, **Exhibit 101** (SKC3000D/4096G). As of October 28, 2026, CDW claimed that it had 1,093 units of the SEDC3000ME/15T3 enterprise SSD available for purchase. **Exhibit 100**.

147. On information and belief, the Kingston Accused Products that CDW purchases for resale or for use in other products originate from outside of the United States. For instance, Kingston's SEDC3000ME/15T3 enterprise SSDs are made in Taiwan. **Exhibit 102**. On information and belief, the Kingston products that CDW purchases come predominately, if not entirely, from Asian countries. **Exhibit 17** (CDW Feb. 20, 2026 10-K Report) at 18 ("[O]ur vendor partners manufacture or purchase a significant portion of the products we sell outside of the US, primarily in Asia.").

148. On information and belief, CDW sells and distributes products that contain Kingston Accused Products, including Lenovo computing systems. For example, CDW sells a Lenovo ThinkSystem SR630 V4 rack server on its website. **Exhibit 103**. Kingston RDIMM KTL-TS564D4-96G is specifically configured for use on Lenovo Systems, including the ThinkSystem SR630 V4. **Exhibit 104**.

149. On information and belief, the Kingston Accused Products that CDW purchases for resale or for use in other products originate from outside of the United States. For instance, Kingston's SEDC3000ME/15T3 enterprise SSD is made in Taiwan. **Exhibit 102**. On information and belief, the Kingston Accused Products that CDW purchases come predominately, if not entirely, from Asian countries. **Exhibit 17** (CDW Feb. 20, 2026 10-K Report) at 18 ("[O]ur vendor partners manufacture or purchase a significant portion of the products we sell outside of the US, primarily in Asia."). On information and belief, products purchased by CDW that contain Kingston Accused Products also originate from outside of the United States. One listing for a Lenovo ThinkSystem SR630 V4 rack lists a country of origin of China. **Exhibit 105**.

150. On information and belief CDW purchases Kingston Accused Products and products containing Kingston Accused Products that were originally manufactured or assembled

outside of the United States. On information and belief, CDW subsequently sells for importation into the United States, imports into the United States, and/or sells after importation into the United States, the Accused Products.

151. On information and belief, Kingston Accused Products are held at properties owned or leased by CDW. On information and belief, CDW holds a commercially significant inventory of Kingston Accused Products in the United States. CDW has a number of U.S.-based locations which, on information and belief, could house inventory, including its two U.S.-based distribution centers—a 513,240 square foot distribution center in North Las Vegas, Nevada, and a 442,400 square foot office and distribution center in Vernon Hills, Illinois. **Exhibit 17** (CDW Feb. 20, 2026 10-K Report) at 22. On information and belief, CDW also ships its products directly to OEMs and wholesale distributors, on occasion. These so-called "drop-shipment arrangements" account for 51% of CDW's total North American 2025 sales. *Id.* at 6.

152. On October 29, 2026, Netlist has purchased a number of Accused SSDs from CDW to be delivered to an address within the United States. **Exhibit 106**. Netlist anticipates it will receive these additional product samples in the near future. Some of the products purchased from CDW have the same part numbers as Kingston products already received by Netlist, such as the SEDC3000ME/3T8 and SKC3000D/4096G. The labels on these products indicate that they were assembled in Taiwan. **Exhibit 78**; **Exhibit 86**. On information and belief, the products purchased from CDW with the same product numbers will similarly have been assembled outside of the United States. The order and shipping information on the CDW receipt indicate that the product will be shipped to an address within the United States, demonstrating that the Proposed Respondents import the product, sell it for importation, and/or sell such SSDs within the United States after importation. **Exhibit 106**.

D. Ingram Micro

153. On information and belief, Proposed Respondent Ingram Micro is importing, selling for importation, and/or selling within the U.S. after importation, certain DRAM or NAND devices, products containing the same—including workstations, servers and computing systems—and/or components thereof.

154. On information and belief, Ingram Micro purchases Kingston memory products to resell and distribute in the United States. Ingram Micro advertises Kingston Accused RDIMM Products on its website. **Exhibit 107**. These products include RDIMMs designed specifically for Lenovo servers and workstations, such as KTL-TS564D4-96G. **Exhibit 108**. Ingram Micro also advertises Kingston Accused SSD Products on its website. **Exhibit 109**. These Accused Products include both enterprise SSDs, **Exhibit 110**, and commercial SSDs, **Exhibit 111**.

155. On information and belief, Ingram Micro sells and/or distributes products that contain Kingston Accused Products, including Lenovo computing systems. For example, Ingram Micro advertises a Lenovo ThinkSystem SR630 V4 rack server on its website. **Exhibit 245**; **Exhibit 112**. Kingston RDIMM KTL-TS564D4-96G is specifically configured for use on Lenovo Systems, including the ThinkSystem SR630 V4. **Exhibit 104**.

156. On information and belief, the Kingston Accused Products that Ingram Micro purchases for resale or for use in other products originate from outside of the United States. For example, Ingram Micro lists the country of origin for Kingston's SKC3000S/1024G SSD as Taiwan. **Exhibit 113**. On information and belief, products purchased by Ingram Micro that contain Kingston Accused Products also originate from outside of the United States. One listing for a Lenovo ThinkSystem SR630 V4 rack lists a country of origin of China. **Exhibit 105**.

157. On information and belief, Ingram Micro purchases Kingston Accused Products and products containing Kingston Accused Products that were originally manufactured or

assembled outside of the United States. On information and belief, Ingram Micro subsequently sells for importation into the United States, imports into the United States, and/or sells after importation into the United States, the Accused Products.

158. On information and belief, Kingston Accused Products are held at properties owned or leased by Ingram Micro. On information and belief, Ingram Micro holds a commercially significant inventory of Kingston Accused Products in the United States. Ingram Micro has a number of U.S.-based office locations which, on information and belief, could house inventory. **Exhibit 114**. Ingram Micro also has a warehouse located at 12510 Micro Drive, Mira Loma, California 91752 where it stores products before shipping to resellers. **Exhibit 115** (Complaint, *Ingram Micro, Inc. v. AIT Worldwide Logistics, Inc.*, No. 3:23-cv-02079, Dkt. No. 1 (Nov. 9, 2023) ¶¶ 13, 14).

159. On information and belief, Ingram Micro purchases Kingston Accused Products and products containing Kingston Accused Products that were originally manufactured or assembled outside of the United States. On information and belief, Ingram Micro subsequently sells for importation into the United States, imports into the United States, and/or sells after importation into the United States, the Accused Products.

160. On information and belief, Ingram Micro delivers Kingston Accused Products to resellers like CDW. **Exhibit 26** (Ingram Micro Holding Corp. July 30, 2026 10-Q Report) at 20. Ingram Micro has previously delivered shipments of computer products to CDW's distribution centers in Nevada and Illinois. See **Exhibit 115** (Complaint, *Ingram Micro, Inc. v. AIT Worldwide Logistics, Inc.*, No. 3:23-cv-02079, Dkt. No. 1 (Nov. 9, 2023) at 5, ¶¶ 13, 14). On these occasions, CDW served as a consignee to Ingram Micro's shipments to carrier AIT Worldwide Logistics. *See id.* at 21, Attachment 2.

161. On October 29, 2026, Netlist has purchased a number of Accused SSDs from Ingram Micro to be delivered to an address within the United States. **Exhibit 116**. Netlist anticipates it will receive these additional product samples in the near future. At least one of the products purchased from Ingram Micro has the same part number as a Kingston product already received by Netlist—the SFYR2S/1T0. The label on this product indicates that it was assembled in Taiwan. **Exhibit 84**. On information and belief, the products purchased from Ingram Micro will similarly have been assembled outside of the United States. The order and shipping information on the Ingram Micro receipt indicate that the product will be shipped to an address within the United States, demonstrating that the Proposed Respondents import the product, sell it for importation, and/or sell such SSDs within the United States after importation. **Exhibit 116**.

E. Insight

162. On information and belief, the Proposed Insight Respondents are importing, selling for importation, and/or selling within the U.S. after importation, certain DRAM or NAND devices, products containing the same—including workstations, servers and computing systems—and/or components thereof.

163. On information and belief, Insight purchases Kingston memory products to resell and distribute in the United States. Insight acquires hardware from hardware manufacturers and from other distributors, like Ingram Micro. **Exhibit 27** (Insight SEC 10-K 2025) at 12 ("We acquire products for resale both directly from manufacturers and publishers and indirectly through distributors[.]"). Ingram Micro was Insight's fifth-largest partner in 2025. *Id.* at 7.

164. Insight sells Kingston DDR5 DIMMs on its website, including Kingston DDR5 RDIMM modules, like KTL-TS556D8-32G, which as of November 3, 2026, was in stock and available for purchase. **Exhibit 117**. Insight also sells both enterprise SSDs, **Exhibit 118** (SEDC2000BM8/960G), and commercial SSDs. **Exhibit 119** (SKC3000D/4096G). As of October

28, 2026, Insight advertised it had well over one hundred of each unit in stock available for purchase. *Id.*

165. On information and belief, Insight sells and/or distributes products that contain Kingston Accused Products, including Lenovo computing systems. For example, Insight sells a Lenovo ThinkStation P5 Tower computing system on its website. **Exhibit 120**. The P5 Tower system is said to have 32 GB of RAM preinstalled. *Id.* Kingston RDIMM KTL-TS556D8-32G is specifically configured for use on Lenovo Systems, including the Lenovo ThinkStation P5 Tower. **Exhibit 121**. As of November 3, 2026, the ThinkStation P5 Tower was listed as backordered, but Insight states on its website that the item will ship "once it's back in stock." **Exhibit 120**.

166. On information and belief, Insight purchases Kingston Accused Products and products containing Kingston Accused Products that were originally manufactured or assembled outside of the United States. On information and belief, Insight subsequently sells for importation into the United States, imports into the United States, and/or sells after importation into the United States, the Accused Products.

167. On information and belief, Kingston Accused Products are held at properties owned or leased by Insight. On information and belief, Insight holds a commercially significant inventory of Kingston Accused Products in the United States. Insight has a number of U.S.-based office locations which, on information and belief, could house inventory. **Exhibit 27** (Insight SEC 10-K 2025) at 22. Insight uses these facilities to store hardware it intends to resell, as well as hardware that Insight procures and subsequently stores on a client's behalf. *Id.* at 56.

168. On October 30, 2026, Netlist has purchased a number of Accused Products from Insight to be delivered to an address within the United States. **Exhibit 122**. Netlist anticipates it will receive these additional product samples in the near future. Some of the products purchased

from Insight have the same part numbers as Kingston products already received by Netlist, such as the SEDC3000ME/3T8 and SKC3000D/4096G. The labels on these products indicate that they were assembled in Taiwan. **Exhibit 78**; **Exhibit 86**. On information and belief, the products purchased from Insight with the same product numbers will similarly have been assembled outside of the United States. The order and shipping information on the Insight receipt indicate that the products will be shipped to an address within the United States, demonstrating that the Proposed Respondents import the product, sell it for importation, and/or sell such Accused Products within the United States after importation. **Exhibit 122**.

F. Zones

169. On information and belief, Proposed Respondent Zones is importing, selling for importation, and/or selling within the U.S. after importation, certain DRAM or NAND devices, products containing the same—including workstations, servers, and computing systems—and/or components thereof.

170. On information and belief, Zones purchases Kingston memory products to resell and distribute in the United States. Zones advertises Kingston Accused Products on its website, **Exhibit 32**, where it sells both Kingston SSDs, such as SNV3S/2000G, **Exhibit 123**, and RDIMMs, such as KTH-PL556D4-64G, **Exhibit 124**. On information and belief, these products originate from outside of the United States and are subsequently sold to purchasers within the United States. **Exhibit 123**.

171. On information and belief, Kingston Accused Products are held at properties owned or leased by Zones. On information and belief, Zones holds a commercially significant inventory of Kingston Accused Products in the United States, such as at its Technology Solution Centers and warehouses. **Exhibit 125**. On information and belief, Zones provides storage space at its facilities

and warehouses for use by its partners, and assists with the procurement and shipping of goods from abroad. *Id.*; **Exhibit 126**.

172. On October 30, 2026, Netlist has purchased a number of Accused Products from Zones to be delivered to an address within the United States. **Exhibit 127**. Netlist anticipates it will receive these additional product samples in the near future. Some of the products purchased from Zones have the same part numbers as Kingston products already received by Netlist, such as the SNV3S/500G and SKC3000D/4096G. The labels on these products indicate that they were assembled in Taiwan. **Exhibit 82**; **Exhibit 86**. On information and belief, the products purchased from Zones with the same product numbers will similarly have been assembled outside of the United States. The order and shipping information on the Zones receipt indicate that the products will be shipped to an address within the United States, demonstrating that the Proposed Respondents import the product, sell it for importation, and/or sell such Accused Products within the United States after importation. **Exhibit 127**.

IX. HARMONIZED TARIFF SCHEDULE NUMBERS

173. The Accused Products are classified under at least the following subheadings of the Harmonized Tariff Schedule of the United States: 8473.30.11.40, 8542.32.00.36, and 8523.51.00.00. These classifications are exemplary in nature and not intended to restrict the scope of any exclusion order or other remedy ordered by the Commission. Additionally, there may be other classifications that Proposed Respondents use for the Accused Products.

X. THE DOMESTIC INDUSTRY RELATING TO THE ASSERTED PATENTS

174. A domestic industry, as set forth in 19 U.S.C. § 1337(a)(2) and defined by 19 U.S.C. § 1337(a)(3), exists, or in the alternative, is in the process of being established, for the following Netlist, SK hynix (and its subsidiary Solidigm), Samsung, and Micron products, which are protected by the Patents:

Asserted Patent	Existing Domestic Industry Products
'731 Patent	• Netlist DDR5 VLP RDIMMs • Netlist Lightning DDR5 RDIMMs • SK hynix DDR5 RDIMMs and MRDIMMs • Samsung DDR5 RDIMMs and MRDIMMs • Micron DDR5 RDIMMs and MRDIMMs
'407 Patent	• Netlist DDR5 VLP RDIMMs • Netlist Lightning DDR5 RDIMMs • SK hynix DDR5 RDIMMs and MRDIMMs • Samsung DDR5 RDIMMs and MRDIMMs • Micron DDR5 RDIMMs and MRDIMMs
'120 Patent	• Netlist Enterprise NVMe SSDs • Micron SSDs • Samsung SSDs • SK hynix SSDs (including Solidigm SSDs)
'481 Patent	• Netlist Enterprise NVMe SSDs • Micron SSDs • Samsung SSDs • SK hynix SSDs (including Solidigm SSDs)

A. The Technical Prong of the Domestic Industry Requirement Is Satisfied

175. In accordance with 19 U.S.C. § 1337(a)(2) and 19 U.S.C. § 1337(a)(3), a domestic industry exists, or in the alternative, is in the process of being established, in the United States in connection with the Asserted Patents.

176. A list of Domestic Industry Products that practice at least one claim from one or more of the Asserted Patents is shown in the table above. Representative claim charts, attached as **Exhibits 128–139, 249–250**, demonstrate that the Domestic Industry Products practice at least one claim of each of the Asserted Patents.[6]

177. Samples of the Domestic Industry Products will be produced during the course of the investigation.

[6] The Domestic Industry Products are protected by additional claims of the Asserted Patents, and Netlist may establish the technical prong of the domestic industry requirement through claims other than those explicitly charted.

178. Netlist reserves the right to rely on additional claims of the Asserted Patents to support the technical prong of the domestic industry requirement.

179. Netlist reserves its right to update its list of domestic industry products, including in light of additional discovery.

B. The Economic Prong of the Domestic Industry Requirement Is Satisfied

180. Netlist intends to rely on the investments of itself and its licensees to the Asserted Patents, SK hynix, Samsung, and Micron, in proving the existence of a domestic industry. Pursuant to Commission Rule 210.12(a)(9)(iv), Complainant has attached a copy of the licensing agreement with SK hynix as **Confidential Exhibit 140C**; a copy of the licensing agreement with Samsung as **Confidential Exhibit 141C**; and a copy of the licensing agreement with Micron as **Confidential Exhibit 142C**.

181. For each of the Asserted Patents, there is a domestic industry pursuant to 19 U.S.C. § 1337(a)(3)(A), (B), and (C) based on the continuing significant domestic investment in plant, equipment, labor, and capital by Netlist and/or its licensees SK hynix, Samsung, and Micron, as well as the continuing substantial domestic investment in exploitation of the Asserted Patents through research, development, and engineering. Netlist has invested tens of millions of dollars since 2021 on developing and creating the Domestic Industry Products, bringing them to market, and sustaining their success through continuous technological development. Similarly, SK hynix, Samsung, and Micron have and will continue to make significant investments in the United States, including at least labor and facility costs. In the alternative, a domestic industry is in the process of being established for each of the Asserted Patents based on the current and continuing investments of Netlist, SK hynix, Samsung, and Micron.

182. Additionally, for each of the Asserted Patents, there is a domestic industry pursuant to 19 U.S.C. § 1337(a)(3) based on the continuing substantial domestic investment by Netlist in the exploitation of the Asserted Patents through licensing.

183. As set forth below, Netlist's licensees, SK hynix, Samsung, and Micron have made significant investments in the United States in developing and creating the Domestic Industry Products, bringing the Domestic Industry Products to market, and sustaining the success of the Domestic Industry Products through continuous development. Indeed, SK hynix, Samsung, and Micron are the three largest suppliers of DRAM in the United States (and the world), accounting collectively for over 85% of the global market by revenue in the second quarter of 2026. **Exhibit 143**. Netlist's licensees are also the three largest suppliers of NAND flash products, accounting for over 60% of the global market share by revenue in the second quarter of 2026, **Exhibit 144**, with 70% of the global market by revenue for enterprise SSDs. **Exhibit 244**; **Exhibit 145**. That supply is supported by extensive domestic infrastructure worth billions of dollars. Thus, to say these companies have made significant investments into this country is a dramatic understatement.

1. Netlist's Domestic Activities

184. Netlist has made and continues to make significant investments in plant and equipment for engineering, sales, and marketing activities related to the Netlist Domestic Industry Products. Netlist's investments in plant and equipment since 2021 have accounted for millions of dollars in expenses. For example, Netlist operates U.S. facilities located in Irvine, California, where Netlist performs engineering and sales activities supporting the Netlist Domestic Industry Products. Detailed confidential information about Netlist's investments related to Domestic Industry Products is set forth in **Confidential Exhibit 146C.** Additionally, an administrative law judge has twice previously concluded that Netlist established a domestic industry based on its significant domestic investments. *See Certain Memory Modules & Components Thereof*, Inv. No.

337-TA-1089, Initial Determination at 139–56 (Oct. 21, 2019); *Certain Memory Modules & Components Thereof*, Inv. No. 337-TA-1023, Initial Determination at 153–65 (Nov. 14, 2017). Although those investments related to earlier-generation Netlist products, those earlier products were foundational for the technologies claimed in several of the Asserted Patents here.

185. Netlist also has made and continues to make significant investments in labor and capital in the U.S. for the Netlist Domestic Industry Products. For example, since 2021, Netlist has spent millions of dollars employing engineering, sales, and marketing employees who have contributed to the development and sale of the Domestic Industry Products. For example, Netlist employs individuals who, among other tasks, work on research, design, product customization, technical support, customer outreach, and component procurement related to the Netlist Domestic Industry Products in the United States. Detailed confidential information about Netlist's significant investments in labor or capital for the Netlist Domestic Industry Products is set forth in **Confidential Exhibit 146C**.

186. The expenditures described above with respect to labor can also be described as Netlist's U.S. investments in research and development and engineering of the Netlist Domestic Industry Products. These allocated costs relate to Netlist's efforts to design and develop the Netlist Domestic Industry Products, research and establish a market for the Netlist Domestic Industry Products, and Netlist's patented technology that the products contain.

187. As a result of these continuing and planned future investments, a domestic industry exists under Section 337(a)(3)(A) due to Netlist's significant investment in plant and equipment in the Netlist Domestic Industry Products; under Section 337(a)(3)(B) due to Netlist's significant investment in labor or capital in the Netlist Domestic Industry Products; and under Section 337(a)(3)(C) due to Netlist's significant investment in research and development and engineering.

188. A domestic industry also exists under Section 337(a)(3)(C) due to Netlist's significant investment in the exploitation of the Asserted Patents through licensing. Netlist continues to make a substantial domestic investment in licensing the Asserted Patents. Netlist's United States employees have negotiated license agreements to the Asserted Patents, each of which generates significant revenue. Netlist makes substantial domestic investments in licensing its patent portfolio, which encompasses the Asserted Patents, including patent portfolio analysis, market monitoring, and negotiations with prospective licensees.

189. The success of Netlist's licensing business, as measured by the number of licenses, resulting revenues, and other benefits, has required substantial domestic investments and has led to continued and increasing ongoing investments to establish an even more extensive domestic licensing business involving Netlist's intellectual property, including the Asserted Patents.

190. There is a nexus between Netlist's substantial investments and the Asserted Patents. **Exhibits 128–139, 249–250** are claim charts demonstrating that each of the Asserted Patents is practiced by at least one of Netlist's licensees.

191. In the alternative, Netlist is in the process of establishing a domestic industry for the Domestic Industry Products. Netlist has taken the necessary tangible steps to establish a domestic industry in the United States by increasing its domestic manufacturing and procuring supply of DRAM and NAND devices from its licensees. There is a significant likelihood that the domestic industry requirement will be satisfied in the future through these activities as well. In light of Netlist's Supply Agreement with Samsung, **Confidential Exhibit 147C**, Netlist expects that it will be able to increase sales of the Domestic Industry Products which will, in turn, increase Netlist's domestic expenditures and investments such that a domestic industry will be established.

2. Licensee SK hynix's Domestic Activities

192. SK hynix is a Korean corporation with a principal place of business at 2091, Gyeongchung-daero, Bubal-eup, Icheon-si, Gyeonggi-do, Korea. **Exhibit 148**. SK hynix sells memory semiconductor products, including DRAM and SSD technologies. **Exhibit 149**.

193. SK hynix Inc. has a number of subsidiaries based in the United States, some of which are also associated with investments in the manufacture and sale of DDR5 DIMMs and SSDs and the research and development of DRAM and NAND technology. SK hynix Inc.'s subsidiaries in the U.S. include SK hynix America Inc., with its headquarters located at 3101 North 1st Street, San Jose, California 95134, and SK hynix memory solutions America Inc., with its headquarters located at 3103 North 1st Street, San Jose, California 95134. **Exhibit 150**. SK hynix America "drives projects" from the parent entity and plays a "key role providing central communication channels between the company and its [U.S.] customers to meet their needs." **Exhibit 247** at 4. SK hynix Inc. has 100% ownership of SK hynix America Inc., and SK hynix America Inc. has sole ownership of SK hynix memory solutions America Inc. **Exhibit 151** at 10 (Condensed Consolidated Interim Financial Statements through Q2 2026). SK hynix memory solutions America Inc., also based in San Jose, designs and develops custom enterprise SSDs and works to qualify those products by replicating customer environments at scale. **Exhibit 246.** Additionally, SK hynix Inc. is the owner of Intel's former NAND flash business and operations, which have been rebranded and collected under the corporate entity Solidigm. **Exhibit 152; Exhibit 154** at 2 ("In late 2021, Intel sold its SSD and NAND business to SK hynix Inc., creating Solidigm. Solidigm now operates as an independent US-based subsidiary of SK hynix Inc."). Solidigm is a U.S.-based company headquartered in Rancho Cordova, California that drives strategy for SSD innovation. **Exhibit 153.** For the purposes of this complaint, "SK hynix" may be

used to refer to SK hynix Inc. or its subsidiaries, including SK hynix America Inc., SK hynix Memory Solutions, or Solidigm.

194. The SK hynix Domestic Industry Products include at least SK hynix RDIMMs, MRDIMMs, and SSDs manufactured and offered for sale by SK hynix, including those offered by Solidigm. Each of these products is covered by one or more claims of the Asserted Patents.

195. On April 5, 2021, Netlist entered into a Strategic Product Supply and License Agreement with SK hynix, which granted SK hynix a license to Netlist's patents and permitted it to make, use, and sell products that practice Netlist's patents. SK hynix sells RDIMM, MRDIMM, and SSD products in the United States pursuant to the terms of that agreement. **Exhibit 140C**.

196. For instance, at OCP Global Summit held in San Jose, California, during October 12 through October 15, 2026, SK hynix displayed to visitors its "flagship products" for AI infrastructure, a lineup that included a 96GB DDR5 RDIMM, a 128GB DDR5 MRDIMM, and SK hynix's enterprise-grade SSDs, among others. **Exhibit 155** at 8. SK hynix displayed similar RDIMM, MRDIMM, and SSD products during FMS 2026 in August in Santa Clara, California, **Exhibit 156**, and during NVIDIA GTC in March 2026, in San Jose. **Exhibit 157**.

197. The United States is a significant market for SK hynix. In the first half of 2026, SK hynix reported 131.9 trillion won ($95.2 billion) in revenue. **Exhibit 158** (SK hynix Q1 2026 Earnings Slides); **Exhibit 159** (SK hynix Q2 2026 Earnings Slides). SK hynix America Inc.'s sales account for 75.5 trillion KRW ($54.4 billion USD[7]) of that revenue—a figure amounting to 57.2% of SK hynix's global sales. **Exhibit 151** at 14 (SK hynix Semi-Annual Report H1 2026). SK hynix America's H1 2026 revenue was more than 3 times its H1 2025 revenue, demonstrating the strength and continued growth of its business in the United States. *Id.* Solidigm, another U.S.-

[7] All dollar amounts are listed as U.S. dollars (USD).

based subsidiary, similarly recorded a massive increase in revenue in 2026. Solidigm's sales in H1 2026 "reached KRW 1.225 trillion, a substantial increase of 265% year-over-year[,]" and its "net profit amounted to KRW 583.9 billion, surging 44-fold compared to the low base of the same period last year." **Exhibit 160** at 2. More broadly, in the first 6 months of 2026, the United States generated about 65% of SK hynix's total revenue (including from all subsidiaries). **Exhibit 151** at 47.

198. A significant portion of SK hynix's revenues is attributable to products that practice at least one of the Asserted Patents. For instance, in the first quarter of FY 2026, SK hynix reported record quarterly revenue of approximately 52.58 trillion KRW (approximately $34.7 billion), representing a roughly 60% increase quarter-over-quarter and a 198% increase year-over-year. **Exhibit 158** (SK hynix Q1 2026 Earnings Slides) at 4. SK hynix attributed its fourth consecutive quarter of record high operating profit to "DRAM and NAND price increase and higher mix of high-value-added products[.]" *Id.* at 5. The success of DRAM and NAND technology has only further driven up SK hynix's record-setting profits as the year has continued. **Exhibit 159** (SK hynix Q2 2026 Earnings Slides) at 5 (citing "DRAM • NAND price increase and cost improvement" as a reason for historic profit); **Exhibit 160** (driven by AI, the average price per TB for Solidigm increased from $101 to $302 over a nine-month period in 2025–2026).

199. In the first half of 2026, SK hynix recorded 98.91 trillion KRW (approximately $74.1 billion) in sales of its DRAM products.[8] About half of SK hynix's DRAM revenue for each quarter is attributable to server applications. **Exhibit 159** (SK hynix Q2 2026 Earnings Slides) at

[8] 98.91 trillion KRW was estimated using SK hynix's Q2 2026 earnings slides. SK hynix's Q1 earnings reported that SK hynix's Q1 DRAM revenue was 78% of 52.576T KRW and SK hynix's Q2 earnings reported that SK hynix's Q2 DRAM revenue was 73% of 79.319T KRW. (78% x 52.576T KRW) + (73% x 79.319T KRW) = 98.91 trillion KRW. *See* **Exhibit 159** (SK hynix Q2 2026 Earnings Slides) at 16.

16. RDIMMs and MRDIMMs likely represent a substantial portion of this server segment. Importantly, SK hynix distinguishes High Bandwidth Memory (HBM) as "Graphics" DRAM, *id.*, while certain other DIMM types are principally associated with non-server applications. **Exhibit 161**. UDIMMs, for example, are standard in desktop and consumer systems, and are "less suitable for servers" because of their limited capacity. **Exhibit 162**. Accordingly, even conservatively assuming that RDIMMs and MRDIMMs account for only 50% of SK hynix's server DRAM sales, SK hynix's first-half 2026 sales of RDIMMs and MRDIMMs would amount to approximately 24.73 trillion KRW (approximately $18.52 billion).[9] Applying the U.S.-to-global sales ratio discussed above of 65% to this number of SK hynix's United States sales of RDIMMs and MRDIMMs during the first half of 2026 can be estimated to be 16.07 trillion KRW (approximately $12.04 billion).

200. For NAND products, SK hynix recorded 32.46 trillion KRW (approximately $24.4 billion) in sales in the first 6 months of 2026.[10] About 75% of SK hynix's NAND revenue for each quarter is attributable to SSD products and SSD components. **Exhibit 159** (SK hynix Q2 2026 Earnings Slides) at 16. Using 75% to estimate SK hynix's SSD revenue in the first half of 2026 yields 24.34 trillion KRW (approximately $18.3 billion). Applying the U.S.-to-global sales ratio

[9] 24.73 trillion KRW was estimated using SK hynix's Q2 2026 earnings slides. "Server" represents about 50% of DRAM revenue for both Q1 2026 and Q2 2026. Assuming RDIMM and MRDIMM sales represent 50% of Server DRAM revenue, RDIMM and MRDIMM revenue was 50% of 50% of 98.91T KRW. (98.91T KRW x 50%) x 50% = 24.73 trillion KRW. *See* **Exhibit 159** (SK hynix Q2 2026 Earnings Slides) at 16.

[10] 32.46 trillion KRW was estimated using SK hynix's Q2 2026 earnings slides. SK hynix's Q1 earnings reported that SK hynix's Q1 NAND revenue was 21% of 52.576T KRW and SK hynix's Q2 earnings reported that SK hynix's Q2 NAND revenue was 27% of 79.319T KRW. (21% x 52.576T KRW) + (27% x 79.319T KRW) = 32.46 trillion KRW. *See* **Exhibit 159** (SK hynix Q2 2026 Earnings Slides) at 16.

discussed above of 65% to this amount, SK hynix's U.S.-based SSD sales during the first half of 2026 can be estimated to be 15.82 trillion KRW (approximately $11.9 billion).

201. SK hynix's upward revenue trend continued through Q3 2026. In its October 28, 2026 earnings release, SK hynix reported Q3 revenue of 104.62 trillion KRW (approximately $77.8 billion). **Exhibit 163** at 4 (SK hynix Q3 2026 Earnings Slides). The percentage of DRAM sales attributable to Server DRAM was higher in Q3 than in any prior quarter of 2026. *Id*. at 17. Similarly, the percentage of NAND sales attributable to SSDs reached its highest level of 2026 in Q3. *Id*. These financial reports demonstrate SK hynix makes significant revenues from sales of the domestic industry products and is expected to continue to do so in the future.

202. SK hynix has spent, and continues to spend, significant sums on domestic facilities and equipment related to the Domestic Industry Products. SK hynix maintains several offices across the United States, in locations such as Seattle, Washington; Austin, Texas; Houston, Texas; San Jose, California; and Rancho Cordova, California. **Exhibit 150**; **Exhibit 153**. These offices are crucial hubs for research and development and sales and marketing. **Exhibit 150**.

203. SK hynix has continued to increase its domestic investments in United States facilities in the past year. For example, in Spring 2026, it was reported that SK hynix purchased land in California for $19.8 million intended for use as an AI data center testbed. **Exhibit 164**. The California site is "expected to be the first real-world overseas stage for consolidating the group's semiconductor (SK Hynix), telecommunications (SK Telecom), and construction and operations (SK Broadband, SK AX) capabilities." *Id*. SK hynix also purchased a 112,000 square-foot office building in San Jose, California for $49.5 million. **Exhibit 165**. The new San Jose office building is believed to include specialized zones for manufacturing and research, indicating "that SK hynix is preparing for a massive scale-up of its domestic U.S. R&D and assembly capabilities[.]" *Id.* at

2. Solidigm in particular has invested over $100 million into regional R&D facilities around the Greater Sacramento region focused on NAND technology development, including SSDs. **Exhibit 166**. The Korea Daily characterized SK hynix's investments in California as part of a greater strategy to build a "Hynix Campus" in the region that would "ensur[e] [SK hynix] has the physical infrastructure on American soil to keep pace with its rivals and partners alike." **Exhibit 165.**

204. SK hynix has spent, and continues to spend, significant sums on domestic labor and capital related to the Domestic Industry Products. SK hynix has represented that it employs over 7,000 people in the United States. **Exhibit 167**. Labor in the United States related to the Domestic Industry products includes evaluation, validation, and engineering adjustments as well as extensive sales operations. *See, e.g.*, **Exhibit 246; Exhibit 150**. SK hynix has recently started hiring more employees in the United States. For example, on July 21, 2026 alone, SK hynix America posted about 60 job openings on LinkedIn for personnel to work in the United States. **Exhibit 168**. Current job postings at SK hynix U.S. locations advertise roles involving development of the technology embodied by the Domestic Industry Products. **Exhibit 169**; **Exhibit 170** (DRAM Field Application Staff Engineer, responsible for "[s]erv[ing] as the primary senior technical interface for key customers"); **Exhibit 171** (NAND/SSD Field Application Engineer, responsible for "[d]riv[ing] validation activities with controller partners to ensure successful integration of SK hynix NAND products"); **Exhibit 172** (SK hynix memory solutions postings); **Exhibit 173** (Principal Product Application Engineer – Enterprise SSDs); **Exhibit 174** (Senior SSD Firmware Architect at Solidigm). SK hynix's American subsidiaries play a vital role in reaching, supporting, and serving the world's largest users of cutting-edge memory and storage technology.

205. As part of its application to the Department of Commerce for funding under the CHIPS and Science Act, SK hynix represented that (i) "SK hynix 'upstream' activities in the U.S.

semiconductor ecosystem resulted in, on an annual average between 2016 and 2020, ~$9 billion in sales activity and ~$5 billion in GDP, and supported more than 46,000 jobs in the United States" and that (ii) "on an annual average between 2016 and 2020, SK hynix products enabled 'downstream' activities that resulted in $116 billion economic activity and $70 billion in GDP, and supported more than 696,000 jobs in the United States[.]" **Exhibit 175** at 1–2. "Upstream activities" include economic activity from direct purchases of semiconductor equipment, materials, and services from U.S.-based companies. *Id*. "Downstream activities" include economic activity from direct sales enablement by SK hynix products by its customers, primarily DRAM and NAND sales. *Id*.

206. In the alternative, SK hynix is in the process of establishing a domestic industry for the Domestic Industry Products. SK hynix is currently in talks with Intel regarding a potential deal to jointly produce memory chips in Ohio. **Exhibit 176**. There have also been reports that Solidigm is considering building a NAND flash memory chip factory in the United States. **Exhibit 177**.

207. The foregoing domestic investments of SK hynix are significant and substantial under Section 337, in both absolute terms and relative to SK hynix's overall operations. SK hynix's investments in the United States enable the collaboration with and sale of its products to customers in the United States. The domestic investments and activities are also vital to SK hynix's domestic business with respect to the Domestic Industry Products and represent significant added value. SK hynix's sales of products to U.S. customers are only possible through its facility investments, engineering, and sales and marketing activities in the United States.

208. Netlist expects that discovery will yield further information showing that Netlist's licensee SK hynix has a significant domestic industry in the United States, or is in the process of establishing one, pursuant to 19 U.S.C. § 1337(a)(2).

3. Licensee Samsung's Domestic Activities

209. Samsung Electronics Co., Ltd. is a Korean corporation with a principal place of business at 129, Samsung-ro, Yeongtong-gu, Suwon-si, Gyeonggi-do, 16677, Korea. **Exhibit 178** at 4 (2026 H1 SEC Business Report). Samsung Electronics Co., Ltd. sells memory semiconductor products, including DDR5 DIMM modules, **Exhibit 179**, and SSDs—both enterprise and non-enterprise. **Exhibit 180**.

210. Samsung Electronics Co., Ltd. has a number of subsidiaries and divisions with operations in the United States that are associated with investments in the manufacture and sale of DDR5 DIMMs and SSDs, as well as with the research and development of DIMM and SSD technology. These subsidiaries include Samsung Semiconductor, Inc., headquartered at 3655 North 1st Street, San Jose, California 95134, and Samsung Austin Semiconductor, LLC, headquartered at 12100 Samsung Blvd., Austin, Texas 78754. **Exhibit 181** (Samsung Semi-Annual Report H1 2026 at 440). Samsung Electronics Co., Ltd. has 100% ownership of Samsung Semiconductor, Inc. and Samsung Austin Semiconductor LLC. **Exhibit 178** (2026 H1 SEC Business Report) at 229–30. For the purposes of this complaint, "Samsung" may be used to refer to Samsung Electronics Co., Ltd. or its subsidiaries, including Samsung Semiconductor, Inc. and Samsung Austin Semiconductor, LLC.

211. The Samsung Domestic Industry Products include at least Samsung's DDR5 RDIMMs and MRDIMMs, and enterprise- and commercial-grade SSDs manufactured and offered for sale by Samsung. Each of these products is covered by one or more claims of the Asserted Patents.

212. On August 4, 2026, Netlist entered into a license agreement with Samsung, which granted Samsung a license to Netlist's patents and permitted it to make, use, and sell products that

practice Netlist's patents. Samsung sells DDR5 RDIMM, DDR5 MRDIMM, and SSD products in the United States pursuant to the terms of that agreement. **Exhibit 141C**.

213. For instance, at OCP Global Summit in October 2026, Samsung displayed its PM1763 and BM1773 SSD as "Featured Products." **Exhibit 182**. Samsung also displayed various DDR5 RDIMM, DDR5 MRDIMM, and SSD products during FMS 2026 on August 4–6 in Santa Clara, California, **Exhibit 183**. Samsung also provides DRAM and NAND products to Netlist directly under terms of a Supply Agreement, executed on August 4, 2026. **Exhibit 147C**.

214. The United States is a significant market for Samsung. In the first half of 2026, Samsung reported 195.6 trillion KRW (approximately $147.1 billion) in worldwide memory sales. **Exhibit 178** (2026 H1 SEC Business Report) at 90. Sales from Samsung Semiconductor, Inc., a U.S.-based subsidiary falling within Samsung's Device Solutions Division, accounted for 103.8 trillion KRW (approximately $78.0 billion) of that total—amounting to about 53% of Samsung's total memory revenue. *Id.* at 61. Additionally, during the spring and summer of 2026, Samsung committed a majority of its memory capacity to major American-based Tech Firms with Long Term Agreements (LTA). **Exhibit 184** (citing Amazon, Microsoft, Google, Meta, and Oracle as among Samsung's LTA customers).

215. A significant portion of Samsung's revenues is attributable to products that practice at least one of the Asserted Patents. In the first quarter of 2026, Samsung's Device Solutions division experienced "[r]ecord earnings led by memory business," reporting 81.7 trillion KRW (approximately $60.7 billion) in sales, an 86% quarter-over-quarter increase. **Exhibit 185** at 6. Similarly, in Q2 2026, Samsung's Device Solutions division experienced an additional 56% increase in sales, reaching 127.5 trillion KRW (approximately $94.7 billion) in revenue. Samsung attributed this success to "all-time high bit sales for both DRAM and NAND" products. **Exhibit**

186 at 6. Samsung is estimated to have generated $98.3 billion in DRAM revenue during the first half of 2026, **Exhibit 187**, a substantial portion of which was likely attributable to DDR5 RDIMM and MRDIMM products. During the same period, Samsung generated $36.6 billion in NAND revenue, **Exhibit 188**; **Exhibit 144**, including an estimated $21.4 billion from enterprise SSDs, **Exhibit 189**; **Exhibit 145**. Most recently, in Q3 2026, Samsung's Device Solutions reported 147.1 trillion KRW (approximately $109.3 billion) in sales, attributing its record-setting revenue to market price increases "led by strong demand momentum for servers," and from "proactively address[ing] growing demand for server SSDs." **Exhibit 190** at 7. Samsung has stated its goal for Q4 2026 is to further increase its sale of DRAM and NAND products, including by "[i]ncrease[ing] supply of high-speed Server DDR5 and QLC [NAND]" products. *Id.* These financial reports demonstrate Samsung makes significant revenues from sales of the domestic industry products and is expected to continue to do so in the future.

216. Samsung has made and continues to make significant investments in facilities and equipment in the United States for the Samsung Domestic Industry Products. Samsung has a number of offices located in the United States. For example, Samsung Semiconductor, Inc., a U.S. subsidiary responsible for research and sales of products including DDR5 RDIMMs and SSDs, has its headquarters and main office in San Jose, California in a facility over 1.1 million square feet. **Exhibit 191** (Samsung Buys 70K SF of Research Building). Recently, in March 2025, it purchased an adjacent 70,700-square-foot building next to the SSI headquarters for $27 million. *Id.* Other sales offices directed to the Memory Business are located in Houston, Raleigh, Seattle, San Diego, and Austin. **Exhibit 192** (Samsung Semiconductor Global Network – Americas). As another example, Samsung Austin Semiconductor, LLC, another U.S. subsidiary responsible for manufacturing, has two Texas fabrication facilities in Austin and Taylor. The Austin facility,

located at 12100 Samsung Blvd, Austin, Texas 78754, is 2.76 million square feet, and had $10.96 billion in "economic impact" in 2024. **Exhibit 193** (Samsung Semiconductor Austin US Fabrication). As stated on Samsung's website, it has "invested more than $18 billion in operating two fabs at the Austin campus since 1996—making it one of the largest direct foreign investments in United States history." *Id.* at 1. The Taylor facility, which broke ground in early 2022, reflected a total expected investment of $17 billion ($6 billion in buildings and real property, and $11 billion in machinery and equipment), bringing Samsung's "total investment in the U.S. to more than $47 billion since beginning operations in the country in 1978, where the company now has over 20,000 employees across the country." **Exhibit 194** (Samsung Electronics Announces New Advanced Semiconductor Fab Site) at 2; **Exhibit 195** (Samsung Semiconductor Taylor US Fabrication). Samsung's Taylor facility "will boost the production of semiconductor solutions that will power next-generation technologies," including in AI and high-performance computing. **Exhibit 195**. Samsung was also awarded up to $4.7 billion in direct funding as part of the CHIPS and Science Act for its investment to build a production base for "two new leading-edge logic fabs and an R&D fab in Taylor, as well as an expansion to [its] existing Austin facility." **Exhibit 196** at 1.

217. Operations at Samsung's U.S. facilities include engineering, research and development, and marketing related to the Domestic Industry Products. For example, on information and belief, Samsung's Memory Labs in San Jose, Folsom, and San Diego, California, involve research related to Samsung's DIMM and SSD products that practice the Asserted Patents. **Exhibit 197**. Among Samsung's Memory Labs in California are (i) the DRAM Design Lab (which includes a MID Team working on developing IO architecture and circuit schemes for upcoming generations of DDR technology, *id.*; (ii) the AGI Computing Lab, which includes the System Technology Group working on designing architectures and system software for SSD applications,

Exhibit 198; and (iii) the Technology Enabling & Development Lab, which works with enterprise and data center customers on qualification and support of SSDs. **Exhibit 199**.

218. Samsung has spent, and continues to spend, significant sums on domestic labor and capital related to the Domestic Industry Products, including in jobs related to DIMM and SSD development and marketing. At the end of 2025, Samsung employed 11,770 individuals in the United States. **Exhibit 200**. As an example, Samsung Electronics Device Solutions America employs around 1,200 people in San Jose, California who "work on semiconductor research and development, as well as sales and marketing." **Exhibit 201**. As of October 28, 2026, Samsung Semiconductor has 377 job openings listed across 7 U.S. locations. **Exhibit 202**. These openings include positions such as Senior Engineer, DRAM Applications, **Exhibit 203**, and Staff Engineer, SSD Storage and Systems Architecture, **Exhibit 204**. Samsung currently employs many individuals in the United States who work on developing and marketing the Domestic Industry Products. *See, e.g.*, **Exhibit 205** (profile of "Sr. Director, DRAM Business Enablement Engineering" responsible for "DRAM design-in and qualification for server OEMs"); **Exhibit 206** (profile of "Senior Principal").

219. The foregoing domestic investments of Samsung are significant and substantial under Section 337, in both absolute terms and relative to Samsung's overall operations. The domestic investments and activities are also vital to Samsung's domestic business with respect to the Domestic Industry Products and represent significant added value. Samsung's research, engineering, and sales activities in its U.S. offices are a critical part of providing the Domestic Industry Products to customers in the United States.

220. Netlist expects that discovery will yield further information showing that Netlist's licensee, Samsung, has a significant domestic industry in the United States, or is in the process of establishing one, pursuant to 19 U.S.C. § 1337(a)(2).

4. Micron's Domestic Activities

221. Micron Technology, Inc. is a United States corporation with a principal place of business at 8000 South Federal Way, Boise, Idaho 83716. **Exhibit 207** at 1. Micron Technology, Inc. sells memory semiconductor products, including DDR5 DIMM modules, **Exhibit 208** (Micron 2026 10-K), and both enterprise and client SSDs, **Exhibit 209**.

222. Micron Technology, Inc. has a number of subsidiaries and divisions with operations in the United States that are associated with investments in the manufacture and sale of DDR5 DIMMs and SSDs, as well as with the research and development of DIMM and SSD technology. These subsidiaries include Micron Semiconductor Products, Inc., Micron Idaho Semiconductor Manufacturing LLC, Micron New York Semiconductor Manufacturing LLC, and Micron Virginia Semiconductor Manufacturing LLC. **Exhibit 210**; **Exhibit 207** (Micron 2026 10-K). For the purposes of this complaint, "Micron" may be used to refer to Micron Technology, Inc. or its subsidiaries, including Micron Semiconductor Products, Inc., Micron Idaho Semiconductor Manufacturing LLC, Micron New York Semiconductor Manufacturing LLC, and Micron Virginia Semiconductor Manufacturing LLC.

223. The Micron Domestic Industry Products include at least Micron DDR5 RDIMMs and MRDIMMs, and enterprise-, commercial-, and industrial-grade SSDs manufactured and offered for sale by Micron. Each of these products is covered by one or more claims of the Asserted Patents.

224. On October 5, 2026, Netlist entered into a License Agreement with Micron, which granted Micron a license to Netlist's patents and permitted it to make, use, and sell products that

practice Netlist's patents, including the Asserted Patents. **Confidential Exhibit 142C**. Micron's DDR5 DIMM and SSD products practice one or more claims of each of the Asserted Patents and are licensed under that agreement.

225. The United States is a significant market for Micron. In Micron's fiscal year 2026, which ended September 2026, the United States accounted for $91.3 billion of Micron's total revenue of $133.2 billion. **Exhibit 207** (Micron 2026 10-K). Micron also avails itself of American exhibitions to advertise the Domestic Industry Products. For instance, Micron received a sustainability award and a "Best of Show" award at FMS 2026 after showcasing its 245TB 6600 ION SSD in Santa Clara, California in August 2026. **Exhibit 211**. Micron also displayed its SSD products in San Jose, California, at NVIDIA GTC earlier in 2026 alongside other RDIMM and MRDIMM products. **Exhibit 212**.

226. A significant portion of Micron's revenue is attributable to products that practice at least one of the Asserted Patents. In fiscal year 2026, Micron reported $100.7 billion in DRAM revenue and $31.785 billion in NAND revenue. **Exhibit 213** at 36. Micron also records its overall revenue under a different scheme, dividing its operations into four different business units based on product types and clientele. Three of the four business units sell Domestic Industry Products. The Cloud Memory Business Unit reported $43.09 billion in FY 2026, and primarily included server DDR5 DIMM, HBM, and LPDDR5 products. **Exhibit 207** (Micron 2026 10-K) at 9. The Core Data Center Business Unit reported $37.59 billion in FY 2026, "primarily includ[ing] sales of [Micron's] DDR5 and DDR4 RDIMMs [and] data center SSDs[.]" *Id.* at 9–10. Finally, Micron's Mobile and Client Business Unit, which reported $36.6 billion in FY 2026, also encompasses client and consumer markets, with products "primarily consist[ing] of DRAM modules, SSDs, packaged DRAM, and packaged NAND." *Id.* at 10. Although the precise amount of Micron's sales

specifically attributable to DDR5 DRAM products or SSDs is not disclosed, the prominent role of the Domestic Industry Products across several business segments demonstrates that the products play an integral part of Micron's business.

227. Micron has spent, and continues to spend, significant sums on domestic facilities and equipment related to the Domestic Industry Products. Micron maintains several offices across the United States, in locations such as Boise, Idaho; Austin, Texas; Richardson, Texas; Syracuse, New York; Manassas, Virginia; and San Jose, California. **Exhibit 214**.

228. Micron has continued to increase its domestic investments in the United States in recent years. For example, in May 2026, Micron's Virginia fab, which manufactures both NAND and DRAM products, began producing 1α DRAM chips—the most advanced memory ever produced in the United States. **Exhibits 215**–**216**. In August 2026, Micron opened a 60,000-square-foot state-of-the-art training center in Boise intended to expand hands-on training in fab operations and manufacturing systems for new hires and students at surrounding colleges. **Exhibit 217**.

229. Operations at Micron's U.S. facilities include engineering, research and development, and marketing related to the Domestic Industry Products. For example, on information and belief, Micron conducts research related to SSD development, validation, and deployment at its office in Folsom, California. *See, e.g.*, **Exhibit 218** (profile for "Sr. Director, SSD Product Development and Validation"); **Exhibit 219** at 2 (job posting for "Principal Technical Product Manager," stationed out of Micron's Folsom office, where employee will manage "technical strategy for one or more SSD product lines from concept through qualification and volume ramp[]"). On information and belief, Micron conducts similar work for DRAM from its offices in Boise, Idaho. *See, e.g.*, **Exhibit 220** (profile of "DRAM Design Engineer"); **Exhibit**

221 (job posting for "Staff System Enablement Engineer," stationed out of Micron's Boise office, where employee will "validate Micron DRAM products on cutting-edge compute platforms . . . ensuring system readiness before customer deployment[]"). In addition to research conducted in Folsom and Boise, Micron also has Research and Development locations in San Jose, California; Longmont, Colorado; Minneapolis, Minnesota; and Richardson, Texas. **Exhibit 222**.

230. Micron has spent, and continues to spend, significant sums on domestic labor and capital related to the Domestic Industry Products, including in jobs related to DIMM and SSD development and marketing. As discussed above, Micron employs skilled individuals at a variety of locations who work directly on the development and deployment of the Domestic Industry Products. Micron has over 10,200 employees based in the United States, including about 7,000 people in and around Boise, Idaho. **Exhibit 248**; **Exhibit 251**.

231. In the alternative, Micron is in the process of establishing a domestic industry for the Domestic Industry Products. Micron is currently rapidly building out its research and manufacturing in the United States, recently announcing it will make $250 billion of investments in the United States before the end of 2035. **Exhibit 223**.

232. Micron has taken the necessary tangible steps to establish an industry for the Asserted Patents, including by investing in the construction of several new research and manufacturing facilities in the United States.

233. Micron was awarded over $6.44 billion in direct funding and $65 million in workforce funding as a result of its application for support under the CHIPS and Science Act. **Exhibit 224**. The investment in Micron was intended to "strengthen U.S. economic and national security by bolstering a reliable domestic supply of the leading-edge DRAM chips that are important components for advanced technologies such as wireless communications, personal

computing, high-performance compute, automotive, and artificial intelligence." *Id*. The fabs that Micron is planning to open in Idaho and New York will be directed towards leading-edge DRAM chip production, while the Virginia facility remains focused on legacy DRAM and NAND chips. *See id.*; **Exhibit 225**; **Exhibit 226**.

234. The construction of Micron's facilities in Idaho, New York, and Virginia is projected to generate over 90,000 direct and indirect U.S. jobs. **Exhibit 223**. These investments will support Micron's long-term goal of producing 40% of its DRAM in the United States. **Exhibit 227**.

235. Micron also recently announced it would invest $10 billion over the next decade to create Micron Research Labs—a research institution to be headquartered in Boise that will specialize in memory technologies, architectures, packaging, and manufacturing. **Exhibit 228**.

236. There is also a significant likelihood that the domestic industry requirement will be met in the near future because of Micron's investments. Construction at Micron's United States facilities has been underway for years and has reached important milestones in the past several months. At Micron's ID1 facility in Boise, construction teams have completed a "blowdown"—the intensive cleaning and preparation of a cleanroom before equipment is installed—for one of the cleanrooms. **Exhibit 229**. For the New York fab site, permits were obtained in 2025 and 2026, **Exhibit 230**, and construction teams began pouring concrete at the New York fab in summer 2026. **Exhibit 227**. The significant progress at these facilities makes it unlikely that Micron will abandon its U.S. facilities after spending years finalizing construction plans, securing grants, obtaining necessary regulatory approvals, and engaging with community members in nearby towns. Micron has also taken steps to strengthen its supply chain for when these facilities begin production,

agreeing to make $3 billion in strategic investments across the United States over the next decade to finance suppliers of manufacturing raw materials. **Exhibit 231**.

237. The foregoing domestic investments of Micron are significant and substantial under Section 337, in both absolute terms and relative to Micron's overall operations. The domestic investments and activities are also vital to Micron's domestic business with respect to the Domestic Industry Products and represent significant added value. Micron's research, engineering, and sales activities in its U.S. offices are a critical part of providing the Domestic Industry Products to customers in the United States.

238. Netlist expects that discovery will yield further information showing that Netlist's licensee, Micron, has a significant domestic industry in the United States, or is in the process of establishing one, pursuant to 19 U.S.C. § 1337(a)(2).

XI. RELATED LITIGATION

A. The '731 Patent

239. On July 8, 2025, Netlist filed an amended complaint alleging infringement of the '731 Patent, among other patents, before the Eastern District of Texas against Samsung Electronics America, Inc.; Samsung Electronics Co., Ltd.; Samsung Semiconductor, Inc.; and Avnet, Inc. *See Netlist, Inc. v. Samsung Elecs. Co., Ltd.*, No. 2:25-cv-00557 (E.D. Tex.). The case was terminated on August 22, 2026, after Samsung entered into a license agreement with Netlist.

240. On July 8, 2025, Netlist filed another amended complaint alleging infringement of the '731 Patent, among other patents, before the Eastern District of Texas against Micron Technology, Inc.; Micron Semiconductor Products, Inc.; Micron Technology Texas, LLC; and Avnet, Inc. *See Netlist, Inc. v. Micron Tech., Inc.*, No. 2:25-cv-00558 (E.D. Tex.). Netlist's patent infringement case was transferred from the Eastern District of Texas to the District of Delaware on March 6, 2026. *See Netlist, Inc. v. Micron Tech., Inc.*, No. 1:26-cv-00246 (D. Del.).

241. On July 10, 2025, Micron filed a declaratory judgment action against Netlist in the District of Delaware, seeking a declaratory judgment that Micron does not infringe the '731 Patent. *See Micron Tech., Inc. v. Netlist, Inc.*, No. 1:25-cv-00863 (D. Del.). The case was later consolidated on May 22, 2026, with the infringement action, *Netlist, Inc. v. Micron Tech., Inc.*, No. 1:26-cv-00246 (D. Del.). *See Micron Tech., Inc. v. Netlist, Inc.*, No. 1:25-cv-00863 (D. Del.). The cases were terminated on October 21, 2026, after Micron entered into a license agreement with Netlist.

242. On August 29, 2025, Samsung Electronics Co., Ltd. filed a petition for inter partes review of the '731 Patent before the Patent Trial and Appeal Board ("PTAB"). *See Samsung Elecs. Co. v. Netlist, Inc.*, IPR2025-01431 (PTAB). On February 18, 2026, the petition was instituted. The proceedings were terminated on August 26, 2026, after Samsung entered into a license agreement with Netlist.

243. On September 30, 2025, Netlist filed a complaint before the International Trade Commission alleging infringement of the '731 Patent, among other patents, against proposed respondents Samsung Electronics Co., Ltd.; Samsung Semiconductor, Inc.; Samsung Electronics America, Inc.; Super Micro Computer, Inc.; and Google LLC. *See Netlist I*, Inv. No. 337-TA-1472 (ITC). *Netlist I* was terminated by the International Trade Commission on October 6, 2026, after Samsung entered into a license agreement with Netlist.

244. On August 10, 2026, Netlist filed a complaint before the International Trade Commission alleging infringement of the '731 Patent, among other patents, against proposed respondents Micron Semiconductor Products, Inc.; Micron Technology, Inc.; Hewlett Packard Enterprise Co.; Lenovo Group Ltd.; Lenovo United States Inc.; and Super Micro Computer, Inc. *See Netlist III*. An Initial Determination granting a Joint Motion to terminate was issued by the

administrative law judge in *Netlist III* on October 27, 2026, after Micron entered into a license agreement with Netlist.

245. On November 4, 2026, Netlist filed a complaint alleging infringement of the ’731 Patent, among other patents, before the United States District Court for the Central District of California against Kingston Technology Corp.; Kingston Technology Co., Inc; Kingston Digital, Inc.; Kingston Technology Far East Corp.; Kingston Solutions, Inc.; Kingston Technology Co., Ltd.; and Kingston Technology (Shanghai) Co. *See Netlist, Inc. v. Kingston Tech. Corp.*, No. 8:26-cv-3262 (C.D. Cal., filed Nov. 4, 2026).

B. The ’407 Patent

246. On July 6, 2026, Netlist filed a complaint before the Eastern District of Texas asserting the ’407 Patent, among other patents, against Samsung Electronics America, Inc.; Samsung Electronics Co., Ltd.; Samsung Semiconductor, Inc.; and Avnet, Inc. *See Netlist Inc v. Samsung Elecs. Co.*, No. 2:26-cv-00553 (E.D. Tex.). The action was terminated on August 25, 2026, after Samsung entered into a license agreement with Netlist.

247. The next day, on July 7, 2026, Samsung Electronics America, Inc.; Samsung Electronics Co., Ltd.; Samsung Semiconductor, Inc.; and Avnet, Inc. filed a declaratory judgment action in the United States District Court for the District of Delaware, seeking a declaratory judgment of non-infringement. *See Samsung Elecs. Co. v. Netlist, Inc.*, No. 1:26-cv-00821 (D. Del.). The action was terminated on August 20, 2026, after Samsung entered into a license agreement with Netlist.

248. On August 10, 2026, Netlist filed a complaint before the Central District of California alleging infringement of the ’407 Patent, among other patents, against Micron Semiconductor Products, Inc. and Micron Technology, Inc. *See Netlist, Inc. v. Micron Tech., Inc.*,

No. 8:26-cv-02167 (C.D. Cal.). The action was terminated on October 19, 2026, after Micron entered into a license agreement with Netlist.

249. On August 10, 2026, Netlist filed a complaint before the International Trade Commission alleging infringement of the ’407 Patent, among other patents, against proposed respondents Micron Semiconductor Products, Inc.; Micron Technology, Inc.; Hewlett Packard Enterprise Co.; Lenovo Group Ltd.; Lenovo United States Inc.; and Super Micro Computer, Inc. *See Netlist III*. An Initial Determination granting a Joint Motion to terminate was issued by the administrative law judge in *Netlist III* on October 27, 2026, after Micron entered into a license agreement with Netlist.

250. On November 4, 2026, Netlist filed a complaint alleging infringement of the ’407 Patent, among other patents, before the United States District Court for the Central District of California against Kingston Technology Corp.; Kingston Technology Co., Inc; Kingston Digital, Inc.; Kingston Technology Far East Corp.; Kingston Solutions, Inc.; Kingston Technology Co., Ltd.; and Kingston Technology (Shanghai) Co. *See Netlist, Inc. v. Kingston Tech. Corp.*, No. 8:26-cv-3262 (C.D. Cal., filed Nov. 4, 2026).

C. The ’120 Patent

251. On November 4, 2026, Netlist filed a complaint alleging infringement of the ’120 Patent, among other patents, before the United States District Court for the Central District of California against Kingston Technology Corp.; Kingston Technology Co., Inc; Kingston Digital, Inc.; Kingston Technology Far East Corp.; Kingston Solutions, Inc.; Kingston Technology Co., Ltd.; and Kingston Technology (Shanghai) Co. *See Netlist, Inc. v. Kingston Tech. Corp.*, No. 8:26-cv-3262 (C.D. Cal., filed Nov. 4, 2026).

D. The ’481 Patent

252. On November 4, 2026, Netlist filed a complaint alleging infringement of the ’481 Patent, among other patents, before the United States District Court for the Central District of California against Kingston Technology Corp.; Kingston Technology Co., Inc; Kingston Digital, Inc.; Kingston Technology Far East Corp.; Kingston Solutions, Inc.; Kingston Technology Co., Ltd.; and Kingston Technology (Shanghai) Co. *See Netlist, Inc. v. Kingston Tech. Corp.*, No. 8:26-cv-3262 (C.D. Cal., filed Nov. 4, 2026).

XII. RELIEF REQUESTED

253. Netlist respectfully requests that the Commission:

(a) Institute an investigation pursuant to Section 337 of the Tariff Act of 1930, as amended, 19 U.S.C. § 1337, with respect to the Proposed Respondents’ violations of that section based on the importation into the United States, sale for importation, and/or sale within the United States after importation of DRAM devices and NAND flash memory devices, products containing the same, and components thereof that infringe one or more claims of the Asserted Patents;

(b) Schedule and conduct a hearing pursuant to Section 337(c) for the purposes of (i) receiving evidence and hearing argument concerning whether there has been a violation of Section 337, and (ii) following the hearing, determining that there has been a violation of Section 337;

(c) Issue a permanent limited exclusion order pursuant to 19 U.S.C. § 1337(d) forbidding entry into the United States of DRAM devices and NAND flash memory devices, products containing the same, and components thereof that infringe one or more claims of the Asserted Patents and are manufactured, imported, sold for importation, and/or sold after importation by or on behalf of the Proposed Respondents, their subsidiaries, related companies, and agents;

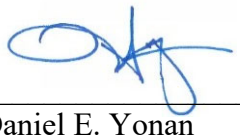
(d) Issue permanent cease-and-desist orders pursuant to 19 U.S.C. § 1337(f) prohibiting the Proposed Respondents, their domestic subsidiaries, related companies, and agents from engaging in the importation, sale for importation, marketing and/or advertising, distribution, offering for sale, sale, use after importation, sale after importation, and other transfer within the United States (except for exportation) of DRAM devices and NAND flash memory devices, products containing the same, and components thereof that infringe one or more claims of the Asserted Patents;

(e) Impose a bond pursuant to 19 U.S.C. § 1337(j) on the importation of any DRAM devices and NAND flash memory devices, products containing the same, and components thereof that infringe one or more claims of the Patents during the 60-day Presidential review period; and

(f) Issue such other and further relief as the Commission deems just and proper under the law, based on the facts determined by the Investigation and the authority of the Commission.

Dated: November 4, 2026

Respectfully submitted,



Daniel E. Yonan
Paul A. Ainsworth
Donald R. Banowit
William H. Milliken
Richard M. Bemben
Daniel S. Block
Lauren A. Watt
STERNE, KESSLER, GOLDSTEIN & FOX P.L.L.C.
1101 K Street NW, 10th Floor
Washington, DC 20005
Tel.: (202) 371-2600
Email: dyonan@sternekessler.com

Jason Sheasby
Annita Zhong, PhD
Andrew Strabone
Lisa Glasser
IRELL & MANELLA LLP
1800 Avenue of the Stars, Suite 900
Los Angeles, CA 90067
Tel.: (310) 277-1010

Counsel for Complainant Netlist, Inc.

UNITED STATES INTERNATIONAL TRADE COMMISSION
WASHINGTON, D.C.

In the Matter of **CERTAIN DYNAMIC RANDOM ACCESS MEMORY (DRAM) DEVICES AND NAND FLASH MEMORY DEVICES, PRODUCTS CONTAINING THE SAME, AND COMPONENTS THEREOF**	**Investigation No. 337-TA-_____**

VERIFICATION OF COMPLAINT

I, Gail Sasaki, am Executive Vice President and Chief Financial Officer of Netlist, Inc., and am authorized to execute this verification of the accompanying Complaint under Section 337 of the Tariff Act of 1390, as Amended, on behalf of Complainant Netlist, Inc. In accordance with Commission Rules 210.4 and 210.12(a), under penalty of perjury, I declare that:

1. I have read the Complaint and am familiar with the allegations and statements contained therein.
2. To the best of my knowledge, information, and belief founded after reasonable inquiry under the circumstances, the allegations and statements made in the Complaint are well-grounded in fact and are warranted by existing law or a good faith argument for the extension, modification, or reversal of existing law.
3. The allegations and other factual contentions in the Complaint have evidentiary support or are likely to have evidentiary support after a reasonable opportunity for further investigation or discovery.

4. This Complaint is not being filed for any improper purpose, such as to harass or to cause unnecessary delay or needless increase in the cost of litigation.

Executed in Irvine, CA on November 4, 2026.



Gail Sasaki
EVP and Chief Financial Officer