Cooley

Stephen R. Smith
T: +1 703 456 8035
stephen.smith@cooley.com

Via EDIS

November 24, 2026

BY EDIS

The Honorable Lisa R. Barton
Secretary to the Commission
U.S. International Trade Commission
500 E Street, S.W., Room 112
Washington, DC 20436

Re: ***Certain Semiconductor Devices, Products Containing Same, and Components Thereof II***

Dear Secretary Barton:

Enclosed for filing on behalf of Complainants Newport Fab, LLC d/b/a Tower Semiconductor Newport Beach, Tower Semiconductor Ltd., Tower U.S. Holdings, Inc., and Tower Semiconductor San Antonio, Inc. (collectively, "Tower" or "Complainants") are documents that support Tower's request that the Commission institute an investigation pursuant to Section 337 of the Tariff Act of 1930, as amended. In accordance with the Commission's Rules, enclosed are the following:

1. One (1) electronic copy of each of Tower's verified confidential and non-confidential Complaint and Statement of Public Interest pursuant to Commission Rules 201.6(c), 201.8, 210.8(a)(1), 210.4(f), 210.8(b), and 210.12(a);
2. One (1) electronic copy of each of the non-confidential and confidential exhibits to the Complaint pursuant to Commission Rules 201.8, 210.8(a)(1), 201.6(c), and 210.12(a)(9), which includes:
    a. One (1) electronic certified copy of each of the Asserted Patents, including U.S. Patent Nos. 9,105,681 ("the '681 patent"); 8,598,713 ("the '713 patent"); 10,686,486 ("the '486 patent"); 10,325,907 ("the '907 patent"); and 10,319,716 ("the '716 patent") pursuant to Commission Rule 210.12(a)(9)(i) and attached as Exhibits 1-5;
    b. One (1) electronic certified copy of each of the assignment documents for the '681, '713, '486, '907, and '716 patents pursuant to Commission Rule 210.12(a)(9)(ii) and attached as Exhibits 6-10;

3. One (1) electronic copy of each of the prosecution histories for the ’681, ’713, ’486, ’907, and ’716 patents pursuant to Commission Rule 210.12(c)(1) and attached as Appendices A-E;
4. One (1) electronic copy of the prosecution histories for priority applications for the ’681, ’713, ’486, ’907, and ’716 patents pursuant to Commission Rule 210.12(c)(2) and attached as Appendices F-G.
5. A letter and certification pursuant to Commission Rules 201.6(b) and 210.5(d) requesting confidential treatment of the Complaint and Exhibits 39-44, and 75-80 to the Complaint.

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

Respectfully,

/s/ Stephen R. Smith
Stephen R. Smith

Counsel for Complainants

Cooley

Stephen R. Smith
T: +1 703 456 8035
stephen.smith@cooley.com

Via EDIS

November 24, 2026

BY EDIS

The Honorable Lisa R. Barton
Secretary to the Commission
U.S. International Trade Commission
500 E Street, S.W., Room 112
Washington, DC 20436

Re: *Certain Semiconductor Devices, Products Containing Same, and Components Thereof II*

Dear Secretary Barton:

I am counsel for Complainants Newport Fab, LLC d/b/a Tower Semiconductor Newport Beach, Tower Semiconductor Ltd., Tower U.S. Holdings, Inc., and Tower Semiconductor San Antonio, Inc. (collectively, "Tower" or "Complainants"). Tower respectfully requests confidential treatment of certain confidential business information in the confidential Complaint and Confidential Exhibits 39-44, and 75-80 to the Complaint in accordance with Commission Rules 201.6(b) and 210.5(d).

The information contained in the Complaint and Exhibits that Tower seeks to redact includes confidential and proprietary technical and commercial information, including commercially sensitive details regarding Tower's investments and expenditures and technical information relating to Tower's products. For example, Confidential Exhibit 44 contains commercially sensitive information relating to Tower's economic domestic industry. Confidential Exhibits 39-43, and 75-80 contain technically sensitive information relating to Tower's technical domestic industry. The Confidential Complaint contains confidential information identified by double brackets.

The information described above qualifies as confidential information under Commission Rule 201.6 because:

1. it is not available to the public;
2. unauthorized disclosure of such information could cause substantial competitive harm to Tower; and
3. its disclosure could impair the Commission's ability to obtain information necessary to perform its statutory function.

Confidential Exhibits 39-43, and 75-80 require redaction in their entirety. In addition, the confidential portions of Exhibit 44 and the Complaint should be redacted.

Please contact me if you have any questions regarding this request for confidential treatment.

Respectfully,

/s/ Stephen R. Smith
Stephen R. Smith

Counsel for Complainants

UNITED STATES INTERNATIONAL TRADE COMMISSION
WASHINGTON, D.C.

In the Matter of **CERTAIN SEMICONDUCTOR DEVICES, PRODUCTS CONTAINING SAME, AND COMPONENTS THEREOF II**	**Investigation No. 337-TA-____**

COMPLAINANTS' PUBLIC INTEREST STATEMENT

Pursuant to 19 C.F.R. § 210.8(b), Complainants Tower Semiconductor Ltd., Tower U.S. Holdings, Inc., Newport Fab, LLC d/b/a Tower Semiconductor Newport Beach, and Tower Semiconductor San Antonio, Inc. (collectively, "Tower") submit this public interest statement regarding the requested issuance of a limited exclusion order and cease-and-desist orders against Proposed Respondents GlobalFoundries Inc., GlobalFoundries (Netherlands) Coöperatief U.A., and GlobalFoundries U.S. Inc. (collectively, "GlobalFoundries"). The issuance of a limited exclusion order and a cease-and-desist orders in this case will not adversely impact the public health and welfare in the United States, competitive conditions in the United States economy, the production of like or directly competitive articles in the United States, or United States consumers.[1] *See* 19 C.F.R. § 210.8(b).

I. REQUESTED REMEDY

Tower seeks a limited exclusion order and cease-and-desist orders relating to semiconductor devices, products containing the same, and components thereof.

[1] In addition, GlobalFoundries' arguments against delegation of the public interest to the ALJ in its public interest statement apply equally here. *See Certain Semiconductor Devices, Products Containing Same, And Components Thereof*, Inv. No. 337-TA-1500, Public Interest Statement (March 26, 2026).

II. HOW THE ACCUSED PRODUCTS ARE USED IN THE UNITED STATES

The Accused Products are semiconductor devices, products containing the same, and components thereof that the Respondents import into the United States, sell for importation into the United States, and/or sell within the United States after importation. The Accused Products are semiconductor devices, products, or components that are not generally sold directly to end consumers.

III. THERE ARE NO PUBLIC HEALTH, SAFETY, OR WELFARE CONCERNS

The Commission rarely declines to issue a remedy on public interest grounds. *See, e.g.*, *Certain Fluidized Supporting Apparatus & Components Thereof*, Inv. No. 337-TA-182/188, USITC Pub. 1667, Comm'n Op. at 23–25 (Oct. 1984) (declining to issue a remedy on hospital beds for burn patients). It should not decline here. The Accused Products are semiconductor devices, products containing the same, and components thereof that serve commercial applications, such as smart mobile device, automotive, and IoT applications. These commercial applications are not the kind of applications that justify declining to issue a remedy. *See Spansion, Inc. v. U.S. Int'l Trade Comm'n*, 629 F.3d 1331, 1360 (Fed. Cir. 2010) (noting that the ITC declines to issue a remedy on public interest grounds where the "exclusion order would deprive the public of products necessary for some important health or welfare need"). Furthermore, as discussed below, this is not a case where exclusion would result in "inadequate supply within the United States" as there are ample and adequate replacements for GlobalFoundries' infringing products, including replacements from Tower itself. *See Spansion*, 629 F.3d at 1360.

In addition, the public interest factors strongly favor protecting intellectual property rights, like Tower's rights in U.S. Patent Nos. 9,105,681 ("the '681 patent"); 8,598,713 ("the '713 patent"); 10,686,486 ("the '486 patent"); 10,325,907 ("the '907 patent"); and 10,319,716 ("the

'716 patent") (collectively, the "Asserted Patents"). *See, e.g., Certain Baseband Processor Chips & Chipsets, Transmitter & Receiver (Radio) Chips, Power Control Chips, & Prods. Containing Same, Including Cellular Phone Handsets*, Inv. No. 337-TA-543, Comm'n Op. at 136–37 (June 19, 2007); *see also Certain LED Photographic Lighting Devices and Components Thereof*, Inv. No. 337-TA-804, Comm'n Op. at 29 (Feb. 28, 2013) (internal citations omitted); *Certain Magnetic Tape Cartridges & Components Thereof*, Inv. No. 337-TA-1058, Comm'n Op. at 68–69 (Apr. 9, 2019).

IV. TOWER AND OTHERS CAN REPLACE THE ACCUSED PRODUCTS

There are plenty of replacement suppliers for semiconductor chips that could replace GlobalFoundries' infringing products within a reasonable time period. For example, Tower manufactures competing devices in the United States and is capable of supplying GlobalFoundries' customers. *See, e.g.,* Tower, Process Technology Offerings, https://towersemi.com/technology/process-technology-offerings/. Tower's current fabrication facilities are capable of replacing GlobalFoundries' infringing products in the marketplace.

In addition, third-party fabrication companies offer products that compete with GlobalFoundries' product offerings and are capable of manufacturing such products within the United States. *See, e.g.,* Semiconductor Industry Association, U.S. Semiconductor Ecosystem Map, https://www.semiconductors.org/ecosystem/ (providing a list of U.S. semiconductor facilities broken up by industry segment). For example, Samsung Foundry offers logic technologies spanning mature through advanced nodes, as well as specialty RF, embedded-memory, high-voltage, and BCD platforms, and maintains a U.S. manufacturing network that includes Austin and Taylor, Texas. https://semiconductor.samsung.com/foundry/process-technology/; https://semiconductor.samsung.com/foundry/about-samsung-foundry/company-info/. SkyWater Technology provides domestic wafer manufacturing and mixed-signal CMOS

foundry services, while X-FAB operates a Lubbock, Texas fabrication facility offering CMOS, mixed-signal, and BCD-on-SOI technologies. https://www.skywatertechnology.com/; https://www.xfab.com/manufacturing/our-fabs?mdrv=www.xfab.com. Texas Instruments, TSMC, and NXP likewise operate substantial U.S. wafer-fabrication capacity and supply analog, embedded-processing, RF, wireless, and/or automotive semiconductor products. https://www.ti.com/en-us/about-ti/newsroom/media-resources/press-kits/ti-invests-60-billion-in-us-manufacturing; https://www.nxp.com/company/about-nxp/worldwide-locations/united-states%3AUSA; https://www.tsmc.com/static/abouttsmcwa/index.html. Analog Devices, Inc. ("ADI") also supplies analog, mixed-signal, RF, and power-management semiconductor products and operates U.S. wafer-fabrication facilities. https://www.sec.gov/Archives/edgar/data/6281/000000628125000153/adi-20251101.htm.

Separate from this foundry capacity, established semiconductor suppliers already market devices in the same functional categories as the Accused Products. For example, NXP offers Wi-Fi 6 and multiprotocol wireless devices supporting Bluetooth Low Energy, Thread, Matter, and IEEE 802.15.4; NXP and Texas Instruments offer additional multiprotocol wireless microcontrollers; Renesas and STMicroelectronics offer extensive families of automotive-control microcontrollers; Qorvo offers 2.4-GHz Wi-Fi power-amplifier and front-end devices; and NXP and Texas Instruments offer processors and systems-on-chip with hardware acceleration for edge-AI applications. https://www.nxp.com/products/RW612; https://www.nxp.com/products/wireless-connectivity/wireless-mcus:MULTIPROTOCOL-MCUS; https://www.ti.com/product/CC2652P7; https://www.renesas.com/en/products/microcontrollers-microprocessors/rh850-automotive-mcus; https://www.st.com/en/microcontrollers-microprocessors/automotive-microcontrollers.html;

https://www.qorvo.com/products/wireless-connectivity/wi-fi-front-end-modules; https://www.qorvo.com/products/p/QPF4211; https://www.nxp.com/products/i.MX8MPLUS; https://www.ti.com/product/TDA4VM.

The breadth of these alternatives demonstrates that neither the Accused Products nor any particular GlobalFoundries manufacturing process provides an irreplaceable source of the relevant commercial functionality. The requested relief therefore would not leave U.S. customers without like or directly competitive semiconductor products.

V. THERE WOULD BE NO NEGATIVE IMPACT ON CONSUMERS

As discussed above, the Accused Products are not sold directly to United States consumers, and ample substitutes, including those manufactured by Tower, exist. Given the ample availability of substitutes, issuance of the requested remedies would not negatively impact United States consumers. For example, competitive pricing would be promoted.

VI. THERE WOULD BE NO NEGATIVE IMPACT ON COMPETITIVE CONDITIONS

The competitive conditions in the U.S. economy would not be impacted. As discussed above, viable replacement and alternative products exist, including those manufactured by Tower. "[C]onsideration is given to whether there are reasonable substitutes for the devices subject to the exclusion order in terms of features, price points, and other pertinent factors." *Certain Elec. Digital Media Devices and Components Thereof*, Inv. No. 337-TA-796, Comm'n Op. at 120 (Sep. 6, 2013). In addition, granting the requested relief here will bolster the competitive conditions in the United States economy by reinforcing intellectual property rights and disincentivizing unfair competition.

VII. CONCLUSION

The Commission should not delegate consideration of the public interest.

Dated: November 24, 2026

Respectfully submitted,

/s/ Stephen R. Smith

COOLEY LLP
Stephen R. Smith
Adam Pivovar
Samuel Whitt
Patrick Lauppe
Matthew Ritter
Haley Chow
1299 Pennsylvania Avenue, NW
Suite 700
Washington, D.C. 20004
Telephone: (202) 842-7800
Facsimile: (202) 842-7899

Eamonn Gardner
1144 15th Street
Suite 2300
Denver, CO 80202
Telephone: (720) 566-4000

Matthew J. Brigham
3175 Hanover Street
Palo Alto, CA 94304
Telephone: (650) 843-5000

Email: TowerITC2@cooley.com

Counsel for Complainants

PUBLIC VERSION

UNITED STATES INTERNATIONAL TRADE COMMISSION
WASHINGTON, D.C.

In the Matter of **CERTAIN SEMICONDUCTOR DEVICES, PRODUCTS CONTAINING SAME, AND COMPONENTS THEREOF II**	**Investigation No. 337-TA-____**

COMPLAINT UNDER SECTION 337 OF THE TARIFF ACT OF 1930

Complainants

Tower Semiconductor Ltd.
Ramat Gavriel Industrial Park, 20 Shaul Amor Avenue, P.O. Box 619, Migdal Haemek 2310502, Israel
Telephone: (949) 435-8000

Tower U.S. Holdings, Inc.
4321 Jamboree Road
Newport Beach, CA 92660
United States
Telephone: (949) 435-8000

Newport Fab, LLC d/b/a
Tower Semiconductor Newport Beach
4321 Jamboree Road
Newport Beach, CA 92660
United States
Telephone: (949) 435-8000

Tower Semiconductor San Antonio, Inc.
9651 Westover Hills Boulevard
San Antonio, TX 78251
United States
Telephone: (949) 435-8000

Counsel for Complainants

Stephen R. Smith
Adam Pivovar
Samuel Whitt
Patrick Lauppe
Matthew Ritter
Haley Chow
COOLEY LLP
1299 Pennsylvania Avenue, NW

Proposed Respondents

GlobalFoundries Inc.
c/o Maples Corporate Services Limited
P.O. Box 309, Ugland House,
Grand Cayman, KY1-1104
Cayman Islands
Telephone: (518) 305-9013

GlobalFoundries (Netherlands)
Coöperatief U.A.
Herikerbergweg 292
1101 CT, Amsterdam
The Netherlands
Telephone: (518) 305-9013

GlobalFoundries U.S. Inc.
400 Stonebreak Road Extension
Malta, NY 12020
Telephone: (518) 305-9013

Suite 700
Washington, D.C. 20004
Telephone: (202) 842-7800
Facsimile: (202) 842-7899

Eamonn Gardner
COOLEY LLP
1144 15th Street
Suite 2300
Denver, CO 80202
Telephone: (720) 566-4000

Matthew J. Brigham
COOLEY LLP
3175 Hanover Street
Palo Alto, CA 94304
Telephone: (650) 843-5000

Email: TowerITC2@cooley.com

PUBLIC VERSION

TABLE OF CONTENTS

Page

I. INTRODUCTION 2
II. COMPLAINANTS 8
III. PROPOSED RESPONDENTS 9
IV. TECHNOLOGY AND PRODUCTS AT ISSUE 9
V. ASSERTED PATENTS AND NON-TECHNICAL DESCRIPTION OF THE INVENTIONS 10
A. Identification and Ownership of the Asserted Patents 11
1. U.S. Patent Number 9,105,681 11
2. U.S. Patent Number 8,598,713 11
3. U.S. Patent Number 10,686,486 12
4. U.S. Patent Number 10,325,907 12
5. U.S. Patent Number 10,319,716 13
B. Non-Technical Descriptions of the Inventions of the Asserted Patents 13
1. U.S. Patent Number 9,105,681 13
2. U.S. Patent Number 8,598,713 14
3. U.S. Patent Number 10,686,486 15
4. U.S. Patent Number 10,325,907 15
5. U.S. Patent Number 10,319,716 16
C. Foreign and Domestic Counterparts to the Asserted Patents 16
D. No Licenses to the Asserted Patents 16
VI. RESPONDENTS' INFRINGEMENT OF THE ASSERTED PATENTS 16
A. Infringement of U.S. Patent Number 9,105,681 17
B. Infringement of U.S. Patent Number 8,598,713 17
C. Infringement of U.S. Patent Number 10,686,486 18
D. Infringement of U.S. Patent Number 10,325,907 18
E. Infringement of U.S. Patent Number 10,319,716 18
VII. RESPONDENTS' SPECIFIC INSTANCES OF UNFAIR IMPORTATION AND SALE 19
VIII. CLASSIFICATION OF THE INFRINGING PRODUCTS UNDER THE HARMONIZED TARIFF SCHEDULE 23
IX. RELATED LITIGATION 24

TABLE OF CONTENTS
(continued)

Page

X. DOMESTIC INDUSTRY RELATING TO THE ASSERTED PATENTS 24
A. Technical Prong 24
B. Economic Prong 25
XI. RELIEF REQUESTED 27

EXHIBIT LIST

Exhibit	Description
1	Certified U.S. Patent No. 9,105,681
2	Certified U.S. Patent No. 8,598,713
3	Certified U.S. Patent No. 10,686,486
4	Certified U.S. Patent No. 10,325,907
5	Certified U.S. Patent No. 10,319,716
6	Certified Assignment History of U.S. Patent No. 9,105,681
7	Certified Assignment History of U.S. Patent No. 8,598,713
8	Certified Assignment History of U.S. Patent No. 10,686,486
9	Certified Assignment History of U.S. Patent No. 10,325,907
10	Certified Assignment History of U.S. Patent No. 10,319,716
11	https://www.sec.gov/Archives/edgar/data/928876/000117891326002318/zk2635149.htm
12	https://towersemi.com/manufacturing/manufacturing-overview/
13	https://towersemi.com/about/history-new/
14	https://towersemi.com/about/history/
15	https://www.sec.gov/Archives/edgar/data/1337675/000117891309000461/zk96426.htm
16	sec.gov/Archives/edgar/data/1200720/000104746906005481/a2169408zex-10_1.htm
17	https://media.corporate-ir.net/media_files/IROL/14/148731/NPB_FCD1266JazzTechnologiesCorporateProfilev2.pdf
18	https://www.sec.gov/Archives/edgar/data/928876/000117891308002453/zk85822.htm
19	https://towersemi.com/wp-content/uploads/2026/03/MPW-Schedule_External_03_10_2026_AC.pdf
20	https://towersemi.com/manufacturing/aerospace-defense/
21	https://towersemi.com/2025/11/10/11102025/
22	https://towersemi.com/wp-content/uploads/2018/08/TowerJazz-20160202-SAFab-acquisition.pdf
23	https://towersemi.com/technology/rf-and-hpa/rf-soi-rf-cmos-platforms/
24	https://towersemi.com/2024/09/10/09102024/
25	https://towersemi.com/technology/rf-and-hpa/sige-bicmos-platform/
26	https://towersemi.com/2025/07/30/07302025/
27	https://towersemi.com/2026/03/17/03172026/
28	https://ir.towerjazz.com/news-releases/news-release-details/towerjazz-and-soitec-sign-agreement-offer-backside-illumination
29	Foreign and Domestic Counterparts to the Asserted Patents
30	This Exhibit Has Been Intentionally Left Blank
31	681 Infringement Chart (Skyworks)
32	713 Infringement Chart (Skyworks)

Exhibit	Description
33	486 Infringement Chart (Silicon Labs)
34	907 Infringement Chart (Infineon)
35	907 Infringement Chart (Rockchip)
36	907 Infringement Chart (Silicon Labs)
37	907 Infringement Chart (Nordic)
38	716 Infringement Chart (Silicon Labs)
39 CBI	681 Domestic Industry Chart
40 CBI	713 Domestic Industry Chart
41 CBI	486 Domestic Industry Chart
42 CBI	907 Domestic Industry Chart
43 CBI	716 Domestic Industry Chart
44 CBI	Declaration of Dr. Marco Racanelli
45	https://www.silabs.com/wireless/wi-fi/siwx917-wireless-socs
46	https://gf.com/news-and-events/news/globalfoundries-and-silicon-labs-partner-to-scale-industry-leading-wi-fi-connectivity/
47	https://www.silabs.com/wireless/wi-fi/siwx917-wireless-socs/device.siwg917m111mgt
48	Receipt for SiWx917-PK6031A
49	Photo of SiWx917-PK6031A
50	https://www.mouser.com/en/ProductDetail/Silicon-Labs/SiWx917-PK6031A?qs=ST9lo4GX8V1aN00Lc40Bvg%3D%3D
51	https://www.skyworksinc.com/Products/Front-end-Modules/SE2565T
52	https://www.mouser.com/PCN/Skyworks_MC_14_0127_CCB_0844.pdf
53	Receipt for SE2565T-R
54	Photo of SE2565T-R
55	https://investors.gf.com/news-releases/news-release-details/globalfoundries-completes-acquisition-ibm-microelectronics
56	https://www.infineon.com/products/microcontroller/32-bit-tricore/aurix-tc3xx#about
57	https://gf.com/news-and-events/news/infineon-and-globalfoundries-extend-long-term-agreement-with-focus-on-automotive-microcontrollers/
58	https://www.infineon.com/press-release/2024/infxx202401-048
59	https://www.mouser.com/en/ProductDetail/Skyworks-Solutions-Inc/SE2565T-R?qs=WMHGlxXAKT%252BCZqMU%252Bvg08w%3D%3D&srsltid=AYCX9vJrC0FYF1kUO1z_teNgJb65wwG4Lhls-7MVJi0H8RYt_FfLGs76
60	Photo of TC387QP160F300SAEKXUMA2
61	https://www.mouser.com/en/ProductDetail/Infineon-Technologies/TC387QP160F300SAEKXUMA2?qs=1Kr7Jg1SGW%2FsMVqSLo6e2w%3D%3D
62	https://www.nordicsemi.com/Products/nRF54H20
63	https://www.nordicsemi.com/Nordic-news/2023/04/Nordic-Semiconductor-redefines-its-leadership-in-Bluetooth-Low-Energy-with-the-nRF54-Series
64	https://www.techinsights.com/blog/nordic-22fdx-bluetooth-54-soc-nrf54h20-emram-floorplan-analysis

Exhibit	Description
65	Receipt for nRF54H20-CKAA-R7
66	Photo of nRF54H20-CKAA-R7
67	https://www.mouser.com/en/new/seeed-studio/seeed-beiqi-rk1808-aiot-96boards-compute-som/?srsltid=AU7gw4XAreLPud3C87RVT4IUTfgXmLBnARhpDAk6udjvUmxzaXPSaBk6
68	https://www.techinsights.com/products/dfr-2001-801
69	https://www.rock-chips.com/a/en/products/RK18_Series/2019/0529/989.html
70	https://gf.com/news-and-events/blog/empowering-your-embedded-ai-with-22fdx/
71	Receipt for Seeed Studio System-on-Module device
72	Photo of Seeed Studio System-on-Module device
73	https://www.mouser.com/en/ProductDetail/Seeed-Studio/102110278?qs=uwxL4vQweFPnI6%252BlP4SXtQ%3D%3D&countryCode=US&currencyCode=USD
74	Harmonized Tariff Schedule for Infringing Products
75 CBI	[[ ]]
76 CBI	[[ ]]
77 CBI	[[ ]]
78 CBI	[[ ]]
79 CBI	[[ ]]
80 CBI	[[ ]]

APPENDIX LIST

Appendix	Description
A	Certified File History for U.S. Patent No. 9,105,681
B	Certified File History for U.S. Patent No. 8,598,713
C	Certified File History for U.S. Patent No. 10,686,486
D	Certified File History for U.S. Patent No. 10,325,907
E	Certified File History for U.S. Patent No. 10,319,716
F	File History for Provisional Application No. 61/271,502
G	File History for Application No. 15/588,011

1. Complainants Newport Fab, LLC d/b/a Tower Semiconductor Newport Beach, Tower Semiconductor Ltd., Tower U.S. Holdings, Inc., and Tower Semiconductor San Antonio, Inc. (collectively, "Tower" or "Complainant") file this complaint pursuant to Section 337 of the Tariff Act of 1930, as amended, 19 U.S.C. § 1337 ("Section 337") against GlobalFoundries Inc., GlobalFoundries (Netherlands) Coöperatief U.A., and GlobalFoundries U.S. Inc. (collectively "GlobalFoundries"). Complainant respectfully requests that the United States International Trade Commission (the "Commission") institute an investigation relating to the unlawful importation, sale for importation, and/or sale after importation into the United States of certain GlobalFoundries semiconductor devices, products containing the same, and components thereof (collectively referred to as "the Accused Products") that infringe multiple valid and enforceable United States patents owned by Complainant, including at least the following claims of the Asserted Patents (U.S. Patent Nos. 9,105,681 ("the '681 patent"); 8,598,713 ("the '713 patent"); 10,686,486 ("the '486 patent"); 10,325,907 ("the '907 patent"); and 10,319,716 ("the '716 patent")) (collectively, the "Asserted Patents") (independent claims bolded):

U.S. Patent No.	Asserted Claims
9,105,681	**1**, 2, 6, 7, 8, **9**, 10, 14, 15, 16
8,598,713	**1**, 2, 3, 4, 6, 7, 8, 9, **11**, 18, 20
10,686,486	**1**, 3, 4, 5, 6, 7, **8**, 10, 11, 12, 13
10,325,907	**1**, 7, 9, 10, 11, 12, 18, 19, 20, 22, 23
10,319,716	**1**, 2, 3, 7, 8, **19**

2. Copies of the Asserted Patents are submitted herewith as Exhibits 1-5. As discussed below, Complainant Newport Fab, LLC d/b/a Tower Semiconductor Newport Beach or Complainant Tower Semiconductor Ltd. holds all rights, title, and interest in and to each of the Asserted Patents. Assignment records for the Asserted Patents are submitted herewith as Exhibits 6-10.

I. INTRODUCTION

3. Tower is a leading, award-winning foundry of high-value analog semiconductors used in a range of products, including RF front-end modules used by top-tier mobile phone manufacturers worldwide. Tower also provides semiconductor technologies and foundry services that support innovative, cost-effective military and security solutions for U.S. aerospace and defense customers. Tower operates semiconductor fabrication facilities in Newport Beach, California; San Antonio, Texas; Japan; and Israel.

4. Complainant Newport Fab, LLC d/b/a Tower Semiconductor Newport Beach ("Tower Newport Beach") is an indirect, wholly owned subsidiary of Complainant Tower Semiconductor Ltd. ("Tower Semiconductor"). Tower Newport Beach's immediate parent is Tower Semiconductor Newport Beach, Inc., which is wholly owned by Tower Semiconductor NPB Holdings Inc.; that company, in turn, is wholly owned by Tower U.S. Holdings, Inc., a wholly owned subsidiary of Tower Semiconductor. Tower Semiconductor and its subsidiaries comprise a global semiconductor foundry group specializing in high-value analog and mixed-signal technologies. The group combines semiconductor research, device engineering, process development, design enablement, and wafer manufacturing to help customers bring specialized integrated circuits from development into commercial production. Tower Newport Beach forms part of the group's United States research, development, and manufacturing operations.

5. Tower Semiconductor's corporate group operates two 200-mm semiconductor fabrication facilities in the United States: Fab 3 in Newport Beach, California, and Fab 9 in San Antonio, Texas. As of December 31, 2025, Tower Semiconductor employed 1,586 people in the United States. Ex. 11, https://www.sec.gov/Archives/edgar/data/928876/000117891326002318/zk2635149.htm.

Tower's Newport Beach and San Antonio facilities support numerous technologies, including silicon-germanium ("SiGe") production. Together, these facilities provide domestic process-development, engineering, qualification, and volume-manufacturing capabilities for customers in consumer, industrial, automotive, mobile, infrastructure, medical, aerospace, and defense markets.



Newport Beach, CA, USA



San Antonio, TX, USA

Ex. 12, https://towersemi.com/manufacturing/manufacturing-overview/.

6. Tower was founded in 1993 through the acquisition of National Semiconductor's 150-mm wafer fabrication facility in Migdal Haemek, Israel, subsequently known as Fab 1, and became a public company in 1994, when its shares began trading on Nasdaq. Ex. 13, https://towersemi.com/about/history-new/. In 2001, Tower began construction of Fab 2, a 200-mm facility adjacent to Fab 1, which began generating production revenue in the third quarter of 2003. Ex. 14, https://towersemi.com/about/history/; Ex. 11, https://www.sec.gov/Archives/edgar/data/928876/000117891326002318/zk2635149.htm. In 2014, Tower further expanded its technology and manufacturing network through a 51%-owned joint partnership with Panasonic Corporation encompassing three fabrication facilities in Japan, including both 200-mm and 300-mm manufacturing capabilities. *Id*. The partnership added 65-nm CMOS image-sensor processes, 45-nm digital technology, and approximately 800,000 wafers per year of available manufacturing capacity measured in 200-mm-wafer equivalents. Ex. 14,

https://towersemi.com/about/history/.

7. Newport Fab's United States manufacturing heritage derives from the well-known Rockwell International Corporation. Rockwell International spun-off Rockwell Semiconductor Systems, which then became Conexant Systems, Inc. In 2002, Conexant contributed its Newport Beach semiconductor fabrication operations to its wholly owned subsidiary Newport Fab, LLC and then contributed Newport Fab to Jazz Semiconductor, Inc. as Jazz was formed as an independent specialty foundry. Ex. 15, https://www.sec.gov/Archives/edgar/data/1337675/000117891309000461/zk96426.htm; Ex. 16, sec.gov/Archives/edgar/data/1200720/000104746906005481/a2169408zex-10_1.htm. Jazz conducted substantially all of its business through Newport Fab and focused on specialty process technologies for highly integrated analog and mixed-signal semiconductor devices serving wireless, optical-networking, power-management, consumer-electronics, storage, aerospace-and-defense, and other high-performance applications. Ex. 15, https://www.sec.gov/Archives/edgar/data/1337675/000117891309000461/zk96426.htm. All of Jazz's process research and development was performed at the Newport Beach facility. *Id.*

8. The Newport Beach operation's innovation base was built over decades. Jazz benefited from approximately 35 years of specialty-process development by Conexant and its predecessor, Rockwell Semiconductor Systems. Ex. 17, https://media.corporate-ir.net/media_files/IROL/14/148731/NPB_FCD1266JazzTechnologiesCorporateProfilev2.pdf. Its technology portfolio included advanced analog CMOS, RF CMOS, high-voltage CMOS, BiCMOS, SiGe BiCMOS, and bipolar-CMOS-DMOS ("BCD") processes; its development work included integrating microelectromechanical systems ("MEMS") with CMOS, employing silicon-on-insulator ("SOI") substrates, and extending specialty processes to 0.13-micron geometries. Ex.

18, https://www.sec.gov/Archives/edgar/data/928876/000117891308002453/zk85822.htm. Before Tower's acquisition, the senior leadership of Jazz Semiconductor's parent, Jazz Technologies, Inc., included Apple co-founder Steve Wozniak, who served as Executive Vice President, Chief Technical Officer, and Chief Visionary Officer. On September 19, 2008, Tower acquired Jazz Technologies in a stock-for-stock transaction, bringing Jazz Semiconductor, Newport Fab, and the Newport Beach 200-mm fabrication operations, known as Fab 3, within Tower and expanding Tower's manufacturing capacity, customer base, and specialty-process portfolio.

9. Today, Newport Fab operates Fab 3 as a 200-mm semiconductor fabrication facility on the Newport Beach campus. Fab 3 comprises approximately 320,000 square feet, including approximately 120,000 square feet of cleanroom space, and supports geometries from approximately 0.80 to 0.13 micron using advanced CMOS technologies that include SiGe and RF-SOI. Ex. 11, https://www.sec.gov/Archives/edgar/data/928876/000117891326002318/zk2635149.htm. Tower maintains a research-and-development department at Newport Beach. *Id.* Tower's 2026 multi-project-wafer schedule lists recurring Fab 3 runs, providing customers a path from prototyping and process qualification to commercial production. Ex. 19, https://towersemi.com/wp-content/uploads/2026/03/MPW-Schedule_External_03_10_2026_AC.pdf.

10. The Newport Beach operation also provides onshore capabilities for critical United States aerospace and defense applications. Ex. 20, https://towersemi.com/manufacturing/aerospace-defense/; Ex. 21, https://towersemi.com/2025/11/10/11102025/. Tower Semiconductor Newport Beach is an ITAR-registered supplier, and Jazz Semiconductor Trusted Foundry, a subsidiary of Newport Fab,

maintains facility-security clearance and Trusted Foundry accreditation. Ex. 20, https://towersemi.com/manufacturing/aerospace-defense/. Tower has continued to invest in Newport Beach and extended the Newport Beach site lease through 2030. Ex. 21, https://towersemi.com/2025/11/10/11102025/. These investments confirm Newport Beach's continuing role as an active center of semiconductor research, process development, and high-volume manufacturing.

11. In February 2016, Tower expanded its United States manufacturing presence by acquiring Maxim Integrated Products, Inc.'s 200-mm wafer fabrication facility in San Antonio, Texas. Ex. 22, https://towersemi.com/wp-content/uploads/2018/08/TowerJazz-20160202-SAFab-acquisition.pdf. The acquisition added approximately 28,000 wafers per month of manufacturing capacity and provided additional flexibility to support customer demand. *Id.* The transaction also included a 15-year supply agreement under which Tower would manufacture products for Maxim while gradually introducing products for other customers. *Id.* Together, the Newport Beach and San Antonio facilities form a significant portion of Tower's manufacturing base and its ability to provide geographically diverse and multi-fab sourcing.

12. Tower's technology portfolio includes a wide variety of processes including RF-SOI and RF CMOS and SiGe BiCMOS. Ex. 11, https://www.sec.gov/Archives/edgar/data/928876/000117891326002318/zk2635149.htm. These platforms serve customers developing products for mobile communications, data infrastructure, automotive, industrial, consumer, medical, aerospace, and defense applications. *Id.* Tower complements its manufacturing capabilities with device models, process-design kits, design libraries, multi-project-wafer prototyping, and process-development, transfer, and optimization services. *Id.* Its customers include both fabless semiconductor companies and integrated device

manufacturers seeking specialized technology or additional manufacturing capacity.

13. Tower has developed five generations of RF-SOI technologies in high-volume manufacturing across 200-mm and 300-mm facilities, addressing demanding requirements for signal isolation, low signal loss, linearity, and integration in wireless devices. Ex. 23, https://towersemi.com/technology/rf-and-hpa/rf-soi-rf-cmos-platforms/. In September 2024, Tower announced production with Broadcom of highly integrated Wi-Fi 7 RF front-end modules using Tower's 300-mm RF-SOI technology. Ex. 24, https://towersemi.com/2024/09/10/09102024/. That technology integrates multiple front-end functions on a single die, reducing chip area and avoiding the additional signal loss associated with transmitting signals between separate dies. Tower's SiGe BiCMOS platform supports high-frequency wireless and high-speed data-communications applications, with production technologies offering transistor performance exceeding Ft/Fmax of 340/450 GHz. Ex. 25, https://towersemi.com/technology/rf-and-hpa/sige-bicmos-platform/. In July 2025, RF-component supplier Wisol recognized Tower with its Best Supplier Award for Tower's RF-SOI technology, engineering support, and supply-chain performance. Ex. 26, https://towersemi.com/2025/07/30/07302025/.

14. Tower's development work also extends to advanced power-management and sensing technologies. In March 2026, Tower announced its Gen3 BCD platform with advanced LDMOS devices designed to address the increasing power-delivery demands of artificial-intelligence data centers by improving efficiency, reducing heat generation, and reducing power-management die area, while also supporting advanced mobile power-management and charger applications. Ex. 27, https://towersemi.com/2026/03/17/03172026/. This reflects Tower's continued commitment to innovation involving specialty process development with customer

collaboration to bring differentiated semiconductor technologies into scalable production.

15. These activities are supported by sustained investment in research and development, yielding patented technologies, including those asserted in this investigation. Tower reported research-and-development expenses of approximately $166 million during 2024 and 2025, net of government participation. Ex. 11, https://www.sec.gov/Archives/edgar/data/928876/000117891326002318/zk2635149.htm. As of December 31, 2025, Tower employed 430 research-and-development professionals worldwide, including 59 with doctoral degrees; maintained research-and-development departments at Newport Beach and San Antonio, as well as in Israel and Japan; employed 1,586 people in the United States; and held 281 patents in force. *Id.* Tower's research and manufacturing organizations, including the Newport Beach operation and Newport Fab, support the continuing development, protection, and commercialization of semiconductor-device, fabrication-process, and integration technologies. *Id.*

II. COMPLAINANTS

16. Tower Semiconductor Ltd. is a corporation organized and existing under the laws of Israel with a place of business at Ramat Gavriel Industrial Park, 20 Shaul Amor Avenue, P.O. Box 619, Migdal Haemek 2310502, Israel.

17. Tower U.S. Holdings, Inc. is a Delaware corporation with a place of business located at 4321 Jamboree Road, Newport Beach, California 92660.

18. Newport Fab is a Delaware limited liability company with its principal place of business at 4321 Jamboree Road, Newport Beach, California 92660, United States.

19. Tower Semiconductor San Antonio, Inc. is a Delaware corporation with a place of business located in San Antonio, Texas.

III. PROPOSED RESPONDENTS

20. On information and belief, Proposed Respondent GlobalFoundries Inc. is an exempted company with limited liability incorporated under Cayman Islands law that is majority-owned by Mubadala Investment Company PJSC, a sovereign investment company of the Government of Abu Dhabi, United Arab Emirates. On information and belief, GlobalFoundries Inc.'s principal place of business in the United States is 400 Stonebreak Road Extension, Malta, New York 12020, United States.

21. On information and belief, Proposed Respondent GlobalFoundries (Netherlands) Coöperatief U.A. is a subsidiary of GlobalFoundries Inc. and is a Dutch cooperative with its principal address at Herikerbergweg 292, 1101 CT Amsterdam, The Netherlands.

22. On information and belief, Proposed Respondent GlobalFoundries U.S. Inc. is a subsidiary of GlobalFoundries (Netherlands) Coöperatief U.A. and is a corporation organized and existing under the laws of the State of Delaware. On information and belief, Proposed Respondent GlobalFoundries U.S. Inc.'s principal place of business is 400 Stonebreak Road Ext., Malta, NY 12020.

IV. TECHNOLOGY AND PRODUCTS AT ISSUE

23. This investigation relates to semiconductor devices and methods for manufacturing the same. The technological advances of the systems and methods described and claimed in the Asserted Patents are summarized below in § V.

24. The Proposed Respondents import, sell for importation, and/or sell within the United States after importation certain semiconductor devices and/or components containing the same and/or components thereof that practice or embody these functionalities. For example, the Proposed Respondents import, sell for importation, and/or sell within the United States, after

importation, semiconductor devices that can be and are incorporated into products including, but not limited to, the Silicon Labs SiWx917 Wi-Fi 6 chip, the Skyworks SE2565T-R, the Infineon AURIX TC3x MCU, the Nordic nRF54H20-CKAA-R7, and the Rockchip RK1808 System on Chip.

25. Pursuant to 19 C.F.R. § 210.12(a)(12), the category of accused products includes certain semiconductor devices manufactured using GlobalFoundries' RF, RF-SOI, RF GaN, power-management, power GaN, BCD, BCDLite, high-voltage BCD, logic, feature-rich CMOS, FinFET, FD-SOI (FDX), SiGe, and BiCMOS processes, and similar processes, and includes wafers and chips.

26. The accused products are made using GlobalFoundries processes that include, as non-limiting examples, at least GlobalFoundries' 8SW, 9SW, 55-nanometer CMOS, 40LP low-power CMOS, RFSOI, 40-nanometer CMOS, 5PAx, and 22FDX process platforms, including semiconductor wafers, dies, and chips, products containing the same, and components thereof.

27. The Accused Products directly and/or indirectly infringe one or more of the Asserted Patents by embodying systems covered by one or more claims of the Asserted Patents or by being manufactured using methods that fall within the scope of one or more method claims of the Asserted Patents.

V. ASSERTED PATENTS AND NON-TECHNICAL DESCRIPTION OF THE INVENTIONS

28. Pursuant to Commission Rule 210.12(c)(1), copies of the prosecution histories for the Asserted Patents are submitted herewith as Appendices A-E. The '681 patent issued from an application that was a division of the application that issued as the '713 patent (file history submitted as Appendix B). The '907 patent issued from an application that was a division of the application that issued as the '716 patent (file history submitted as Appendix E). Pursuant to

Commission Rule 210.12(c)(2), copies of the prosecution histories for other priority applications of the Asserted Patents are submitted herewith as Appendices F-G.

A. Identification and Ownership of the Asserted Patents

29. Complainant asserts five U.S. patents in this investigation. A table identifying the claims asserted against GlobalFoundries and for domestic industry purposes is provided below.

	'681	'713	'486	'907	'716
Infringement by GlobalFoundries	1, 2, 6, 7, 8, 9, 10, 14, 15, 16	1, 2, 3, 4, 6, 7, 8, 9, 11, 18, 20	1, 3, 4, 5, 6, 7, 8, 10, 11, 12, 13	1, 7, 9, 10, 11, 12, 18, 19, 20, 22, 23	1, 2, 3, 7, 8, 19
Domestic Industry	9	11	1	1	1

1. U.S. Patent Number 9,105,681

30. The '681 patent, titled "Method for Forming Deep Silicon Via for Grounding of Circuits and Devices, Emitter Ballasting and Isolation," issued on August 11, 2015, to inventors Volker Blaschke, Todd Thibeault, Chris Cureton, Paul Hurwitz, Arjun Kar-Roy, David Howard, and Marco Racanelli. It is in the same family and shares a specification with the '713 patent. The '681 patent issued from Application No. 13/657,007, filed on October 22, 2012, which was a division of Application No. 12/800,663, filed on May 20, 2010 (now U.S. Patent No. 8,598,713). The '681 patent claims the benefit of U.S. Provisional Application No. 61/271,502, filed on July 22, 2009. The patent expires on September 24, 2030. Complainant owns the entire right, title, and interest in the '681 patent. *See* Ex. 6 (certified assignment record of the '681 patent).

31. The '681 patent has two independent claims and 14 dependent claims. Independent claims 1 and 9 are asserted against Proposed Respondent GlobalFoundries in this investigation, along with dependent claims 2, 6, 7, 8, 10, 14, 15, and 16.

2. U.S. Patent Number 8,598,713

32. The '713 patent, titled "Deep Silicon Via for Grounding of Circuits and Devices,

Emitter Ballasting and Isolation," issued on December 3, 2013, to inventors Volker Blaschke, Todd Thibeault, Chris Cureton, Paul Hurwitz, Arjun Kar-Roy, David Howard, and Marco Racanelli. It is the parent of and shares a specification with the '681 patent. The '713 patent issued from Application No. 12/800,663, filed on May 20, 2010. The '713 patent claims the benefit of U.S. Provisional Application No. 61/271,502, filed on July 22, 2009. The patent expires on February 3, 2032. Complainant owns the entire right, title, and interest in the '713 patent. *See* Ex. 7 (certified assignment record of the '713 patent).

33. The '713 patent has two independent claims and 18 dependent claims. Independent claims 1 and 11 are asserted against Proposed Respondent GlobalFoundries in this investigation, along with dependent claims 2, 3, 4, 6, 7, 8, 9, 18, and 20.

3. U.S. Patent Number 10,686,486

34. The '486 patent, titled "Radio Frequency (RF) Switch with Improved Power Handling," issued on June 16, 2020, to inventors Roda Kanawati and Paul D. Hurwitz. The '486 patent issued from Application No. 16/460,079, filed on July 2, 2019. The patent expires on July 2, 2039. Complainant owns the entire right, title, and interest in the '486 patent. *See* Ex. 8 (certified assignment record of the '486 patent).

35. The '486 patent has three independent claims and 17 dependent claims. Independent claims 1 and 8 are asserted against Proposed Respondent GlobalFoundries in this investigation, along with dependent claims 3, 4, 5, 6, 7, 10, 11, 12, and 13.

4. U.S. Patent Number 10,325,907

36. The '907 patent, titled "Substrate Isolation for Low-Loss Radio Frequency (RF) Circuits," issued on June 18, 2019, to inventors Kurt A. Moen, Edward J. Preisler, and Paul D. Hurwitz. It is in the same family and shares a specification with the '716 patent. The '907 patent

issued from Application No. 16/116,816, filed on August 29, 2018, which was a division of Application No. 15/658,252, filed on July 24, 2017 (now U.S. Patent No. 10,319,716), which, in turn, was a continuation-in-part of Application No. 15/588,011, filed on May 5, 2017. The '907 patent expires on May 5, 2037. Complainant owns the entire right, title, and interest in the '907 patent. *See* Ex. 9 (certified assignment record of the '907 patent).

37. The '907 patent has one independent claim and 24 dependent claims. Independent claim 1 is asserted against Proposed Respondent GlobalFoundries in this investigation, along with dependent claims 7, 9, 10, 11, 12, 18, 19, 20, 22, and 23.

5. U.S. Patent Number 10,319,716

38. The '716 patent, titled "Substrate Isolation for Low-Loss Radio Frequency (RF) Circuits," issued on June 11, 2019, to inventors Kurt A. Moen, Edward J. Preisler, and Paul D. Hurwitz. It is the parent of and shares a specification with the '907 patent. The '716 patent issued from Application No. 15/658,252, filed on July 24, 2017, which, in turn, was a continuation-in-part of Application No. 15/588,011, filed on May 5, 2017. The '716 patent expires on May 5, 2037. Complainant owns the entire right, title, and interest in the '716 patent. *See* Ex. 10 (certified assignment record of the '716 patent).

39. The '716 patent has four independent claims and 17 dependent claims. Independent claims 1 and 19 are asserted against Proposed Respondent GlobalFoundries in this investigation, along with dependent claims 2, 3, 7, and 8.

B. Non-Technical Descriptions of the Inventions of the Asserted Patents[1]

1. U.S. Patent Number 9,105,681

40. The '681 patent generally relates to methods for creating compact vertical electrical

[1] These descriptions and any other nontechnical descriptions within this Complaint are for

connections, known as deep silicon vias, within semiconductor dies. In some embodiments, rather than forming a large opening all the way through the wafer, the claimed methods involve forming an opening through an epitaxial semiconductor layer and only partway into the underlying conductive substrate, with the epitaxial layer and substrate having the same conductivity type, and then forming a conductive plug in the opening. The resulting via in these embodiments can provide a relatively shorter electrical path from circuitry near the surface of the die to the substrate or another common electrical potential. In disclosed embodiments, this approach can provide lower inductance and use less chip area than bond wires or conventional through-wafer vias, while offering a controllable resistance that may improve grounding, transistor stability, power handling, linearity, and electrical isolation.

2. U.S. Patent Number 8,598,713

41. The ’713 patent generally relates to semiconductor structures that incorporate a deep silicon via. In certain embodiments, the claimed structures include openings that pass through upper insulating layers and epitaxial semiconductor layers and extend only partway into conductive substrates, insulating layers along sidewalls of the openings, and conductive plugs that contact the substrates. In non-technical terms, the via in these embodiments operates as a small, built-in vertical connection between circuitry near the top of the chip and the conductive material beneath it. The disclosed structure in these embodiments can provide a low-inductance path to ground or another common electrical potential without the size and backside-processing demands of a through-wafer via, and multiple vias may be used to stabilize power transistors or shield circuit components from electrical interference and unwanted substrate currents.

---

illustrative purposes only. Nothing contained within this Complaint is intended to express, either implicitly or explicitly, any position regarding the proper construction or scope of any claim of the Asserted Patents.

3. U.S. Patent Number 10,686,486

42. Certain embodiments of the ’486 patent generally relate to reducing unwanted electrical coupling in radio-frequency transistors, particularly when the transistors are turned off. In conventional RF transistors, the insulating material above the gate can contribute to parasitic capacitance between the source and drain, which can load the RF signal and limit switch performance. The claimed transistor addresses this problem by providing a gap over the gate and placing in that gap a material having a lower dielectric constant than the surrounding insulating material, thereby reducing the transistor’s off-state capacitance. The disclosed reduction in off-state capacitance can lessen capacitive loading, improve RF isolation and power handling, conserve power, and promote a more even distribution of voltage across transistors used in a stacked RF switch.

4. U.S. Patent Number 10,325,907

43. The ’907 patent generally relates, in certain embodiments, to a semiconductor isolation structure designed to keep radio-frequency signals from leaking into or traveling through the semiconductor substrate. The claimed structure of such embodiments combines shallow isolation trenches near the chip surface with a grid of deeper isolation trenches that passes through the shallow isolation and extends into the substrate, while selected semiconductor regions extend through the shallow isolation within the isolation region. In non-technical terms, the shallow and deep trenches in these embodiments work together to divide and isolate portions of the substrate, making it more difficult for unwanted current and RF energy to travel between neighboring circuit elements. The disclosed structure can reduce signal loss, crosstalk, and nonlinearity and can improve the isolation and power-handling performance of integrated RF switches, passive components, and other CMOS or SiGe BiCMOS circuitry.

5. U.S. Patent Number 10,319,716

44. Embodiments of the '716 patent generally relate to methods of manufacturing isolation regions for low-loss radio-frequency circuitry. In one embodiment, the claimed method forms shallow isolation trenches while intentionally leaving small, device-free semiconductor regions that reach the chip surface, and then forms a deeper trench-isolation grid that extends through the semiconductor region and uses only T-shaped or Y-shaped intersections. Those device-free regions can support the structure during polishing, while the deep-trench grid separates portions of the semiconductor material and interrupts paths through which unwanted current and RF signals could otherwise travel. The disclosed method of this embodiment can therefore reduce substrate coupling, crosstalk, insertion loss, and nonlinearity and can help integrate RF switches and related CMOS or SiGe BiCMOS circuitry on a single chip.

C. Foreign and Domestic Counterparts to the Asserted Patents

45. There are no foreign counterparts to the Asserted Patents. Pursuant to Commission Rule 210.12(a)(9)(v), a list of each domestic patent application, and each domestic patent application that has been denied, abandoned, or withdrawn, corresponding to each involved U.S. patent, with an indication of the prosecution status of each such patent application, is attached as Exhibit 29.

D. No Licenses to the Asserted Patents

46. Pursuant to Commission Rule 210.12(a)(9), there are no entities believed to be licensed to the Asserted Patents.

VI. RESPONDENTS' INFRINGEMENT OF THE ASSERTED PATENTS

47. Exemplary unlawful and unfair acts of the Proposed Respondents are summarized below and in the accompanying claim charts. Complainant expressly reserves the right to identify

additional accused products and/or processes after obtaining discovery from the Proposed Respondents. Thus, Complainant's identification of specific models or types of products or processes below is not intended to limit the scope of the investigation. Any remedy should extend to all infringing products.

A. Infringement of U.S. Patent Number 9,105,681

48. On information and belief, GlobalFoundries imports, sells for importation, and/or sells after importation into the United States, Accused Products that infringe the '681 patent, literally, under the doctrine of equivalents, directly, and/or indirectly under 35 U.S.C. § 271(a), (b), (c), (f), and/or (g). The '681 Accused Products include at least devices manufactured using GlobalFoundries' SiGe, BiCMOS, CMOS, and RFSOI processes, including but not limited to Skyworks' SE2565T-R, made using GlobalFoundries' 5PAe process ("'681 Accused Products"). Claim charts comparing independent claims 1 and 9 of the '681 patent to the '681 Accused Products are attached as Exhibit 31.

B. Infringement of U.S. Patent Number 8,598,713

49. On information and belief, GlobalFoundries imports, sells for importation, and/or sells after importation into the United States, Accused Products that infringe the '713 patent, literally, under the doctrine of equivalents, directly, and/or indirectly under 35 U.S.C. § 271(a), (b), (c), (f), and/or (g). The '713 Accused Products include at least devices manufactured using GlobalFoundries' SiGe, BiCMOS, CMOS, and RFSOI processes, including but not limited to Skyworks' SE2565T-R, made using GlobalFoundries' 5PAe process ("'713 Accused Products"). Claim charts comparing independent claims 1 and 11 of the '713 patent to the '713 Accused Products are attached as Exhibit 32.

C. Infringement of U.S. Patent Number 10,686,486

50. On information and belief, GlobalFoundries imports, sells for importation, and/or sells after importation into the United States, Accused Products that infringe the '486 patent, literally, under the doctrine of equivalents, directly, and/or indirectly under 35 U.S.C. § 271(a), (b), (c), (f), and/or (g). The '486 Accused Products include at least devices manufactured using GlobalFoundries' 8SW, 9SW, 22FDX, 45RFSOI, 45RFE, 130NSX, and 40LP CMOS processes, including but not limited to Silicon Labs' SiWx917 Wi-Fi 6 chip ("'486 Accused Products"). Claim charts comparing independent claims 1 and 8 of the '486 patent to the '486 Accused Products are attached as Exhibit 33.

D. Infringement of U.S. Patent Number 10,325,907

51. On information and belief, GlobalFoundries imports, sells for importation, and/or sells after importation into the United States, Accused Products that infringe the '907 patent, literally, under the doctrine of equivalents, directly, and/or indirectly under 35 U.S.C. § 271(a), (b), (c), (f), and/or (g). The '907 Accused Products include at least devices manufactured using GlobalFoundries' 40LP CMOS, 22FDX, and 40 nm CMOS processes, including but not limited to Infineon's AURIX TC3x MCU, made using GlobalFoundries' 40 nm CMOS process, Nordic's nRF54H20-CKAA-R7, made using GlobalFoundries' 22FDX process, Rockchip's RK1808 System on Chip, made using GlobalFoundries' 22FDX process, and Silicon Labs' SiWx917 Wi-Fi 6 chip, made using GlobalFoundries' 40LP CMOS process ("'907 Accused Products"). Claim charts comparing independent claim 1 of the '907 patent to the '907 Accused Products are attached as Exhibits 34-37.

E. Infringement of U.S. Patent Number 10,319,716

52. On information and belief, GlobalFoundries imports, sells for importation, and/or

sells after importation into the United States, Accused Products that infringe the '716 patent, literally, under the doctrine of equivalents, directly, and/or indirectly under 35 U.S.C. § 271(a), (b), (c), (f), and/or (g). The '716 Accused Products include at least devices manufactured using GlobalFoundries' 40LP CMOS, 22FDX, and 40 nm CMOS processes, including but not limited to Silicon Labs' SiWx917 Wi-Fi 6 chip ("'716 Accused Products"). Claim charts comparing independent claims 1 and 19 of the '716 patent to the '716 Accused Products are attached as Exhibit 38.

VII. RESPONDENTS' SPECIFIC INSTANCES OF UNFAIR IMPORTATION AND SALE

53. On information and belief, the Proposed Respondents are importing, selling for importation, and/or selling within the United States after importation, certain semiconductor devices, products containing same, and components thereof.

54. The specific instances set forth below are representative examples of Proposed Respondents' unlawful importation, sale for importation, and/or sales within the United States after importation of infringing products.

55. Silicon Labs offers the SiWx917 Wi-Fi 6 System on Chip for ultra-low power IoT wireless devices using Wi-Fi, Bluetooth, Matter, and IP networking for secure cloud connectivity. Ex. 45, https://www.silabs.com/wireless/wi-fi/siwx917-wireless-socs. In August 2025, GlobalFoundries announced that it would use its 40nm process technology through its partnership with Silicon Labs to manufacture and ship more than 10 million Silicon Labs Wi-Fi units built on GF's 40LP platform, including the SiWx917 Wi-Fi 6 chip. Ex. 46, https://gf.com/news-and-events/news/globalfoundries-and-silicon-labs-partner-to-scale-industry-leading-wi-fi-connectivity/; *see also* Ex. 47, https://www.silabs.com/wireless/wi-fi/siwx917-wireless-socs/device.siwg917m111mgt (under "Quality & Packaging" tab, stating Silicon Labs'

expectation of full production for the SiWG917M111MGT through at least December 2033). Thus, on information and belief, GlobalFoundries is continuing to manufacture the SiWx917 Wi-Fi 6 System on Chip for Silicon Labs.

56. A receipt showing purchase of a SiWx917-PK6031A, which includes the SiWx917 Wi-Fi 6 System on Chip, from U.S.-based distributor Mouser is submitted herewith as Exhibit 48. A photograph showing the purchased SiWx917-PK6031A is submitted herewith as Exhibit 49. On information and belief, GlobalFoundries imports and/or sells for importation the SiWx917-PK6031A. For example, under "Product & Trade Compliance," Mouser's website lists the "Country of Origin" for this product as "Norway." Ex. 50, https://www.mouser.com/en/ProductDetail/Silicon-Labs/SiWx917-PK6031A?qs=ST9lo4GX8V1aN00Lc40Bvg%3D%3D.

57. Skyworks offers the SE2565T-R, which is a high power 802.11bgn WLAN power amplifier module providing the functionality of a power amplifier, power detector, reference voltage generator, and input match. Ex. 51, https://www.skyworksinc.com/Products/Front-end-Modules/SE2565T. On information and belief, GlobalFoundries manufactures the SE2565T-R. For example, a Skyworks product change notification dated May 19, 2014, identifies the SE2565T-R as a product affected by a manufacturing change moving backside grind, polish, and back-metal processing to IBM's Burlington, Vermont facility. Ex. 52, https://www.mouser.com/PCN/Skyworks_MC_14_0127_CCB_0844.pdf. Exhibit 52 identifies the process used to make the SE2565T-R as GlobalFoundries' 5PAe SiGe BiCMOS process. *Id.* GlobalFoundries acquired IBM's Microelectronics business, including the Burlington fabrication facility, in 2015. Ex. 55, https://investors.gf.com/news-releases/news-release-details/globalfoundries-completes-acquisition-ibm-microelectronics. On information and belief,

GlobalFoundries is continuing to manufacture the SE2565T-R for Skyworks using one or more 5PAx processes.

58. A receipt showing purchase of a SE2565T-R from U.S.-based distributor Digi-Key Corporation ("DigiKey") is submitted herewith as Exhibit 53. A photograph showing the purchased SE2565T-R is submitted herewith as Exhibit 54. On information and belief, GlobalFoundries imports and/or sells for importation the SE2565T-R. For example, Mouser's product page for the SE2565T-R shows "Singapore" as country of origin. Ex. 59, https://www.mouser.com/en/ProductDetail/Skyworks-Solutions-Inc/SE2565T-R?qs=WMHGlxXAKT%252BCZqMU%252Bvg08w%3D%3D&srsltid=AYCX9vJrC0FYF1kUO1z_teNgJb65wwG4Lhls-7MVJi0H8RYt_FfLGs76.

59. Infineon offers the AURIX TC3x line of MCUs, which are a family of microcontrollers with multiple cores of Infineon's TriCore™ architecture, program and data memories, buses, bus arbitration, interrupt systems, DMA controllers, and on-chip peripherals. Ex. 56, https://www.infineon.com/products/microcontroller/32-bit-tricore/aurix-tc3xx#about. Infineon and GlobalFoundries announced a multi-year agreement on supply of the AURIX TC3x line of MCUs through 2030. Ex. 57, https://gf.com/news-and-events/news/infineon-and-globalfoundries-extend-long-term-agreement-with-focus-on-automotive-microcontrollers/; Ex. 58, https://www.infineon.com/press-release/2024/infxx202401-048. Thus, on information and belief, GlobalFoundries is continuing to manufacture the AURIX TC3x line of MCUs for Infineon.

60. A receipt showing purchase of a TC387QP160F300SAEKXUMA2, which includes an AURIX TC3x MCU, from U.S.-based distributor Mouser is submitted herewith as Exhibit 48. A photograph showing the purchased TC387QP160F300SAEKXUMA2 is submitted herewith as Exhibit 60. On information and belief, GlobalFoundries imports and/or sells for importation the

TC387QP160F300SAEKXUMA2. For example, under "Product & Trade Compliance," Mouser's website lists the "Country of Origin" for this product as "Germany." Ex. 61, https://www.mouser.com/en/ProductDetail/Infineon-Technologies/TC387QP160F300SAEKXUMA2?qs=1Kr7Jg1SGW%2FsMVqSLo6e2w%3D%3D.

61. Nordic offers the nRF54H20-CKAA-R7 ultra-low-power System on Chip for IoT applications. Ex. 62, https://www.nordicsemi.com/Products/nRF54H20. Nordic's official April 12, 2023, announcement states that the nRF54 Series introduced a hardware architecture fabricated on the GlobalFoundries 22FDX process, and identifies the nRF54H20 as the first System on Chip in that series. Ex. 63, https://www.nordicsemi.com/Nordic-news/2023/04/Nordic-Semiconductor-redefines-its-leadership-in-Bluetooth-Low-Energy-with-the-nRF54-Series. A July 2025 analysis of TechInsights identifies a die found inside the nRF54H20-CKAA-R7 as a "Nordic 22FDX Bluetooth 5.4 SoC." Ex. 64, https://www.techinsights.com/blog/nordic-22fdx-bluetooth-54-soc-nrf54h20-emram-floorplan-analysis. Thus, on information and belief, GlobalFoundries is continuing to manufacture the nRF54H20-CKAA-R7 for Nordic.

62. A receipt showing purchase of nRF54H20-CKAA-R7 devices from U.S.-based distributor Future Electronics Inc. ("Future Electronics") is submitted herewith as Exhibit 65. A photograph showing the purchased nRF54H20-CKAA-R7 devices is submitted herewith as Exhibit 66. On information and belief, GlobalFoundries imports and/or sells for importation the nRF54H20-CKAA-R7. For example, the product purchase receipt from Future Electronics lists the country of origin for this product as "Taiwan." Ex. 65.

63. Rockchip offers the RK1808 System on Chip, a control chip for Artificial Intelligence of Things (AIoT) applications. Ex. 67, https://www.mouser.com/en/new/seeed-

studio/seeed-beiqi-rk1808-aiot-96boards-compute-som/?srsltid=AU7gw4XAreLPud3C87RVT4IUTfgXmLBnARhpDAk6udjvUmxzaXPSaBk6. A TechInsights analysis indicates that Rockchip's RK1808 is made using GlobalFoundries' 22FDX process. Ex. 68, https://www.techinsights.com/products/dfr-2001-801. Rockchip's website indicates that the RK1808 is currently in mass production ("MP Now"). Ex. 69, https://www.rock-chips.com/a/en/products/RK18_Series/2019/0529/989.html. GlobalFoundries continues to promote its 22FDX platform for embedded AI applications. Ex. 70, https://gf.com/news-and-events/blog/empowering-your-embedded-ai-with-22fdx/. Thus, on information and belief, GlobalFoundries is continuing to manufacture the RK1808 System on Chip for Rockchip.

64. A receipt showing purchase of a Seeed Studio System-on-Module device with product no. 102110278, which includes a RK1808 System on Chip, from U.S.-based distributor Mouser is submitted herewith as Exhibit 71. A photograph showing the purchased Seeed Studio System-on-Module device with product no. 102110278 is submitted herewith as Exhibit 72. On information and belief, GlobalFoundries imports and/or sells for importation the Seeed Studio System-on-Module device with product no. 102110278 to, e.g., Seeed Studio for importation by Seeed Studio and/or Mouser. For example, under "Product & Trade Compliance," Mouser's website lists the "Country of Origin" for this product as "China." Ex. 73, https://www.mouser.com/en/ProductDetail/Seeed-Studio/102110278?qs=uwxL4vQweFPnI6%252BlP4SXtQ%3D%3D&countryCode=US&currencyCode=USD.

VIII. CLASSIFICATION OF THE INFRINGING PRODUCTS UNDER THE HARMONIZED TARIFF SCHEDULE

65. On information and belief, the Harmonized Tariff Schedule of the United States item numbers under which the infringing semiconductor devices may be imported into the United

States are listed in Exhibit 74. These classifications are exemplary only and are not intended to limit any requested relief with respect to the accused products or processes.

IX. RELATED LITIGATION

66. The Asserted Patents are the subject of a civil lawsuit that is being filed concurrently in the U.S. District Court for the Western District of Texas against Proposed Respondents GlobalFoundries Inc., GlobalFoundries (Netherlands) Coöperatief U.A., and GlobalFoundries U.S. Inc.

67. Pursuant to Commission Rule 210.12(a)(5), Complainant states that, other than the litigation specified above, to Complainant's knowledge, the alleged unfair methods of competition and unfair acts, or the subject matter thereof, are not, and have not been, the subject of any court or agency litigation, or of any arbitration.

X. DOMESTIC INDUSTRY RELATING TO THE ASSERTED PATENTS

68. In accordance with Section 337(a)(2) and (a)(3), a domestic industry exists in the United States in connection with the Asserted Patents, as explained in more detail below.

A. Technical Prong

69. Confidential Exhibits 39-43 are claim charts that include exemplary mappings of Complainant's products and processes that currently practice at least one valid claim of each Asserted Patent. These mappings are preliminary and non-limiting. Any patent claim interpretation included therein is for information purposes only and is not intended to construe any claim. Complainant reserves the right to present additional or modified mappings after claim construction, discovery, or receipt of any additional information. Complainant expressly reserves the right to update or amend its identified domestic industry products and processes.

70. Confidential Exhibit 39 includes a claim chart demonstrating how Complainant

currently practices at least claim 9 of the ’681 patent.

71. Confidential Exhibit 40 includes a claim chart demonstrating how Complainant currently practices at least claim 11 of the ’713 patent.

72. Confidential Exhibit 41 includes a claim chart demonstrating how Complainant currently practices at least claim 1 of the ’486 patent.

73. Confidential Exhibit 42 includes a claim chart demonstrating how Complainant currently practices at least claim 1 of the ’907 patent.

74. Confidential Exhibit 43 includes a claim chart demonstrating how Complainant currently practices at least claim 1 of the ’716 patent.

B. Economic Prong

75. A domestic industry exists in the United States under at least 19 U.S.C. § 1337(a)(3)(A), 19 U.S.C. § 1337(a)(3)(B), and/or 19 U.S.C. § 1337(a)(3)(C). *See, e.g.,* Confidential Exhibit 44 (Declaration of Marco Racanelli, Ph.D.). Tower has made and continues to make significant investments in plant and equipment, in labor and capital, and in exploiting its intellectual property through engineering, research and development, and other customer support activities. The domestic industry exists based on Tower’s substantial and significant activities within the United States, which include manufacturing, research and development, quality assurance, engineering, sales and marketing activities, and other support activities for the Domestic Industry Products (“Domestic Industry Products” include, as non-limiting examples, those products and processes discussed in Confidential Exhibit Nos. 39-43). *See generally id.*

76. For example, there is a domestic industry under at least subprong (A) at least because Tower has made substantial investments in plant and equipment in the United States with respect to the Tower Domestic Industry Products. *Id*. at ¶¶ 14-17. Tower has two fabrication

facilities in the United States: Fab 3 in Newport Beach, California and Fab 9 in San Antonio, Texas. *Id*. at ¶¶ 3-4, 6-10. [[ ]] *Id*. at ¶ 16. Tower has been manufacturing products in the United States since at least as early as 2008. *Id*. at ¶¶ 3-4. Tower has invested [[ ]] in building capital, machinery, and other expenditures for Fab 3 and Fab 9. *Id*. at ¶¶ 3-4, 6-10.

77. [[ ]]

78. At the end of last year, Tower employed 1,586 people in the United States. *Id*. at ¶ 18. [[ ]]

79. In addition, the Domestic Industry Products account for a significant amount of U.S. sales, and thus a significant amount of manufacturing, testing, and R&D-related plant and equipment expenditures. *See, e.g.*, *id*. at ¶¶ 11-13.

80. There is also a domestic industry as defined under subprong (B) at least because Tower has made significant investments in the employment of labor and capital in the United States with respect to the Domestic Industry Products. For example, as noted above, Tower employed 1,586 people in the United States at the end of 2025. *Id*. at ¶¶ 18-19, 22-23. Tower has

invested significantly in employee salaries, wages, and benefits for employees involved in the research and development, engineering, manufacturing, and other support activities of the Domestic Industry Products. *Id*. at ¶¶ 19-22.

81. The Domestic Industry Products account for a significant amount of U.S. sales, and therefore account for a significant amount of labor and capital expenditures. *See, e.g.*, *id*. at ¶¶ 11-13.

82. There is also a domestic industry as defined under subprong (C) at least because Tower has made significant investments in the exploitation of the inventions of the Asserted Patents by continually investing in the engineering, research, and development of the Domestic Industry Products. *Id*. at ¶¶ 20-21.

83. Tower engages in research and development activities that focus on continuing to improve existing products and that focus on continuing to develop new products that utilize the technologies from the Asserted Patents.

XI. RELIEF REQUESTED

84. Tower respectfully requests that the Commission:

(a) Institute an immediate 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 arising from the importation into the United States, sale for importation, and/or the sale within the United States after importation of certain semiconductor devices and/or components containing the same and/or components thereof, that infringe one or more claims of United States Patent Nos. 9,105,681; 8,598,713; 10,686,486; 10,325,907; and/or 10,319,716;

(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 exclusion order directed to products manufactured by the Proposed Respondents, their subsidiaries, affiliates, related companies, and agents pursuant to 19 U.S.C. § 1337(d) excluding entry into the United States of certain semiconductor devices and/or components containing the same and/or components thereof, that infringe one or more claims of United States Patent Nos. 9,105,681; 8,598,713; 10,686,486; 10,325,907; and/or 10,319,716;

(d) Issue a permanent cease and desist order pursuant to 19 U.S.C. § 1337(f) prohibiting the Proposed Respondents, their subsidiaries, affiliates, related companies, and agents from selling for importation, importing, marketing or selling, offering for sale, offering sales or technical support related to, or using, certain semiconductor devices and/or components containing the same and/or components thereof, that are covered by, infringe, and/or are the subject of induced or contributory infringement with respect to one or more claims of United States Patent Nos. 9,105,681; 8,598,713; 10,686,486; 10,325,907; and/or 10,319,716;

(e) Impose a bond upon importation of certain semiconductor devices and/or components containing the same and/or components thereof, during the 60-day Presidential review period pursuant to 19 U.S.C. § 1337(j); 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 24, 2026

Respectfully submitted,

By: */s/ Stephen R. Smith*
Stephen R. Smith
Adam Pivovar

Samuel Whitt
Patrick Lauppe
Matthew Ritter
Haley Chow
COOLEY LLP
1299 Pennsylvania Avenue, NW
Suite 700
Washington, D.C. 20004
Telephone: (202) 842-7800
Facsimile: (202) 842-7899

Eamonn Gardner
COOLEY LLP
1144 15th Street
Suite 2300
Denver, CO 80202
Telephone: (720) 566-4000

Matthew J. Brigham
COOLEY LLP
3175 Hanover Street
Palo Alto, CA 94304
Telephone: (650) 843-5000

Email: TowerITC2@cooley.com

Counsel for Complainants

VERIFICATION

I, Nati Somekh, declare in accordance with 19 C.F.R. §§ 210.4 and 210.12(a), under penalty of perjury, that the following statements are true:

1. I am Chief Legal Officer at Newport Fab, LLC d/b/a Tower Semiconductor Newport Beach, and I am duly authorized to verify this Complaint under Section 337 of the Tariff Act of 1930, as amended ("Complaint");

2. I have read the Complaint and am aware of its contents;

3. To the best of my knowledge, information, and belief, formed after an inquiry reasonable under the circumstances, (a) the claims and other legal contentions in the Complaint are warranted by existing law or by a non-frivolous argument for the extension, modification, or reversal of existing law or the establishment of new law, and (b) the allegations and other factual contentions in the Complaint have evidentiary support or, if specifically so identified, are likely to have evidentiary support after a reasonable opportunity for further investigation or discovery; and

4. The Complaint is not being presented for any improper purpose, such as to harass or to cause unnecessary delay or needless increase in the cost of the investigation or related proceedings.

5. I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Date: November 21, 2026

Nati Somekh
Senior Vice President, Chief Legal Officer
and Corporate Secretary
Tower Semiconductor Ltd.,
Tower U.S. Holdings, Inc.,
Newport Fab, LLC d/b/a
Tower Semiconductor Newport Beach,
Tower Semiconductor San Antonio, Inc.