

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

VLSI TECHNOLOGY LLC,

Plaintiff,

v.

INTEL CORPORATION,

Defendant.

C.A. No. 18-966-CFC-CJB

**PLAINTIFF VLSI TECHNOLOGY LLC'S SECOND MOTION
TO REINTRODUCE CERTAIN ASSERTED PATENT CLAIMS, OR TO
SEVER SUCH CLAIMS INTO A SEPARATE ACTION TO BE STAYED**

Plaintiff VLSI Technology LLC ("VLSI") respectfully moves the Court for an order reintroducing (or severing and staying) the following claims:

1. Claim 2 of U.S. Patent No. 7,523,331;
2. Claim 17 of U.S. Patent No. 8,081,026;
3. Claims 1 and 13 of U.S. Patent No. 6,212,633; and
4. Claim 11 of U.S. Patent No. 7,247,552.

The grounds for this motion are set forth in VLSI's Opening Brief and the Declaration of Christopher Abernethy, filed contemporaneously herewith.

Dated: February 27, 2020

Respectfully submitted,

FARNAN LLP

/s/ Brian E. Farnan

Brian E. Farnan (Bar No. 4089)
Michael J. Farnan (Bar No. 5165)
919 N. Market St., 12th Floor
Wilmington, DE 19801
Telephone : (302) 777-0300
Fax : (302) 777-0301
bfarnan@farnanlaw.com
mfarnan@farnanlaw.com

Morgan Chu (admitted *pro hac vice*)
Benjamin Hattenbach (admitted *pro hac vice*)
Lian D. Jablon (admitted *pro hac vice*)
Christopher Abernethy (admitted *pro hac vice*)
Amy E. Proctor (admitted *pro hac vice*)
Dominik Slusarczyk (admitted *pro hac vice*)
S. Adina Stohl (admitted *pro hac vice*)
Leah Johannesson (admitted *pro hac vice*)
Charlotte J. Wen (admitted *pro hac vice*)
Brian M. Weissenberg (admitted *pro hac vice*)
IRELL & MANELLA LLP
1800 Avenue of the Stars, Suite 900
Los Angeles, California 90067
Telephone: (310) 277-1010
mchu@irell.com
bhatenbach@irell.com
ijablon@irell.com
cabernethy@irell.com
aproctor@irell.com
dslusarczyk@irell.com
astohl@irell.com
ljohannesson@irell.com
cwen@irell.com
bweissenberg@irell.com

Attorneys for Plaintiff VLSI Technology LLC