IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION

VLSI TECHNOLOGY LLC,

Plaintiff,

v.

INTEL CORPORATION,

Defendant.

Case No. 6:21-cv-00057-ADA

JURY VERDICT FORM

3/2/21

1235

JURY VERDICT FORM

When answering the following questions and filling out this Verdict Form, please follow the directions provided throughout the form. Your answer to each question must be unanimous. Some of the questions contain legal terms that are defined and explained in detail in the Jury Instructions. Please refer to the Jury Instructions if you are unsure about the meaning or usage of any legal term that appears in the questions below.

As used herein, "VLSI" means VLSI Technology, LLC, and "Intel" means "Intel Corporation." As used herein, "'373 Patent" refers to U.S. Patent No. 7,523,373 and "'759 Patent" refers to U.S. Patent No. 7,725,759.

We, the jury, unanimously agree to the answers to the following questions and return them as our verdict in this case:

I. LITERAL INFRINGEMENT

Directions – Question Nos. 1 & 2

In answering the Questions below, please check "**Yes**" or "**No**" for each listed asserted claim in the space provided.

Question No. 1: Has VLSI proven by a preponderance of the evidence that Intel has literally infringed the following asserted claims of the **'373 Patent**? "Yes" is in favor of VLSI, and "No" is in favor of Intel.

'373 Patent

Claim 1:	Yes ✓	No ____
Claim 5:	Yes ✓	No ____
Claim 6:	Yes ✓	No ____
Claim 9:	Yes ✓	No ____
Claim 11:	Yes ✓	No ____

Question No. 2: Has VLSI proven by a preponderance of the evidence that Intel has literally infringed the following asserted claims of the **'759 Patent**? "Yes" is in favor of VLSI, and "No" is in favor of Intel.

'759 Patent

Claim 14:	Yes ____	No ✓
Claim 17:	Yes ____	No ✓
Claim 18:	Yes ____	No ✓
Claim 24:	Yes ____	No ✓

If you have selected "No" for any claim of the '759 Patent listed in Question 2, please proceed to **Question No. 3** for those claims only.

If you have selected "Yes" for all claims of the '759 Patent in Question 2, do not answer Question 3. Please proceed directly to **Question No. 4**.

II. INFRINGEMENT UNDER THE DOCTRINE OF EQUIVALENTS

Directions – Question No. 3

In answering the Question below, please check "**Yes**" or "**No**" for each listed asserted claim in the space provided.

Question No. 3: Answer the following question for each claim of the '759 Patent for which you answered "No" in Question 2 above. Do not answer and leave the form blank for any claim where you answered "yes" in Question No. 2 and found that there was infringement.

Has VLSI proven by a preponderance of the evidence that Intel has infringed the following asserted claims of the **'759 Patent** under the doctrine of equivalents? "Yes" is in favor of VLSI, and "No" is in favor of Intel.

'759 Patent

Claim 14:	Yes ✓	No _____
Claim 17:	Yes ✓	No _____
Claim 18:	Yes ✓	No _____
Claim 24:	Yes ✓	No _____

Please proceed to **Question No. 4**.

III. WILLFUL INFRINGEMENT

Directions – Question No. 4

In answering the Question below, please check "**Yes**" or "**No**" for each listed asserted patent in the space provided.

Question No. 4: Answer the following question for each patent for which you found at least one claim infringed in Questions 1, 2 and/or 3 above. Has VLSI proven by a preponderance of the evidence that Intel's infringement was willful? "Yes" is in favor of VLSI, and "No" is in favor of Intel.

'373 Patent:	Yes _____	No ✓
'759 Patent:	Yes _____	No ✓

Please proceed to **Question No. 5**.

IV. VALIDITY

Directions – Question No. 5

In answering the Question below, please check "**Yes**" or "**No**" for each listed asserted claim of the '759 Patent in the space provided. This Question is relevant to the '759 Patent only.

Question No. 5: Has Intel proven by clear and convincing evidence that the following asserted claims of the **'759 Patent** are invalid for anticipation by the Yonah Processor alone? "No" is in favor of VLSI, and "Yes" is in favor of Intel.

'759 Patent

Claim 14:	Yes _____	No ✓
Claim 17:	Yes _____	No ✓
Claim 18:	Yes _____	No ✓
Claim 24:	Yes _____	No ✓

Please proceed to **Question Nos. 6-7**.

V. DAMAGES

Directions – Question Nos. 6 & 7

In answering the Questions below, please provide a **dollar amount** in the blank spaces.

Question No. 6: Answer the following question if there is at least one claim of the '373 Patent for which you answered "Yes" in Question 1.

What is the amount of damages you find VLSI has proven by a preponderance of the evidence for Intel's past infringement of the **'373 Patent**?

$ 1,500,000,000.

Question No. 7: Answer the following question if there is at least one claim of the '759 Patent for which you answered "Yes" in either Question 2 or Question 3, and "No" in Question 4.

What is the amount of damages you find VLSI has proven by a preponderance of the evidence for Intel's past infringement of the **'759 Patent**?

$ 675,000,000.

Question No. 8: Is the total amount of damages you found in Questions 6 & 7, 1) a running royalty in the form of a lump sum for past damages only or 2) a lump sum for all damages?

1) Running royalty in the form of a lump sum for past damages only [_____]

-OR-

2) Lump sum for all damages [✓]

You have now reached the end of the verdict form and should review it to ensure it accurately reflects your **unanimous** determinations. After you are satisfied that your unanimous answers are correctly reflected above, your Jury Foreperson should then sign and date this Verdict Form in the spaces below. Once that is done, notify the Court Security Officer that you have reached a verdict. The jury foreperson should retain possession of the verdict form and bring it when the jury is brought back into the courtroom.

I certify that the jury unanimously concurs in every element of the above verdict.

SIGNED this 2 day of March, 2021.

JURY FOREPERSON