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16 Attorneys for Defendant and Counterclaimant
17 SONICS, INC.

18 ADDITIONAL ATTORNEYS LISTED
19 ON NEXT PAGE

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28
UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

ARTERIS, S.A.S.,

Plaintiff,

v.

SONICS, INC.,

Defendant.

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24 16 Attorneys for Plaintiff and Counter-
25 Defendant
26 ARTERIS S.A.S.
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1 1. Sender: Office of the Clerk
2 U.S. District Court for the Northern District of California
3 Oakland Courthouse, Courtroom 4 - 3rd Floor
4 1301 Clay Street,
5 Oakland, CA 94612

6 2. Central Authority of the Ministère de la Justice
7 Requested State: Direction des Affaires Civiles et du Sceau
8 Bureau de l'entraide civile et commerciale internationale (D3)
9 13, Place Vendôme
10 75042 Paris Cedex 01
11 France
12 Tel: + 33 (1) 44 77 64 52

13 3. Person to whom the The Hon. Kandis A. Westmore
14 executed request is to be U.S. Magistrate Judge
15 returned: U.S. District Court for the Northern District of California
16 Oakland Courthouse, Courtroom 4 - 3rd Floor
17 1301 Clay Street,
18 Oakland, CA 94612

19 4. In accordance with Article U.S. District Court for the Northern District of California
20 3 of the Convention, the Oakland Courthouse, Courtroom 4 - 3rd Floor
21 undersigned application 1301 Clay Street,
22 hast the honor to submit Oakland, CA 94612

23 5. a. Requesting judicial France
24 authority:
25 b. To the competent France
26 authority of:
27 c. Name of case and Arteris, S.A.S. v. Sonics, Inc., Case No. 3:12-CV-00434-WHA
28 identifying number: (KAW)

29 6. Names and addresses of Arteris, S.A.S.
30 the parties and their 6 Parc Ariane – Immeuble Mercure
31 representatives: Boulevard des Chenes – 78284 Guyancourt Cedex – France

32 a. Plaintiffs: Represented by:
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b. Defendant and Counterclaimant: **Sonics, Inc.**
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7. Nature and purposes of the proceedings and summary of the facts:

Defendant and Counterclaimant Sonics, Inc. (“Sonics”) was founded in 1996. Sonics provides network-on-a-chip (“NoC”) technology and tools. Sonics’ products include SonicsSX, SonicsLX, SNAP, Sonics3220, and SonicsGN.

Plaintiff and Counter-Defendant Arteris S.A.S. (“Arteris”), was founded in 2003 and is a subsidiary of U.S. based Arteris Holdings, Inc. Arteris provides NoC technology and tools. Arteris’ NoC products include Arteris FlexNoC, Arteris FlexWay, Arteris NoCcompiler, FlexArtist, FlexExplorer, FlexVerifier, NoCverifier, and Danube Network on a Chip Intellectual Property Library.

Arteris, Inc. was founded in 2004 and is also a subsidiary of U.S. based Arteris Holdings, Inc. Arteris, Inc. provides NoC technology and tools. Arteris, Inc.'s NoC products include, Arteris FlexNoC, Arteris FlexWay, Arteris NoCcompiler, FlexArtist, FlexExplorer, FlexVerifier, NoCverifier, and Danube Network on a Chip Intellectual Property Library.

There are two lawsuits involving the parties, both pending in the Northern District of California: *Sonics, Inc. v. Arteris, Inc.* (Case No. 4:11-CV-05311-SBA), pending before Judge

1 Armstrong, and *Arteris, S.A.S. v. Sonics, Inc.* (Case No. 12-
2 CV-00434-WHA), pending before Judge Alsup.

3 On November 1, 2011, Sonics filed a complaint against
4 Arteris, Inc., alleging infringement of United States Patents
5 Nos. 6,182,183 (the “183 Patent”); 7,266,786 (the “786
6 Patent”); 7,277,975 (the “975 patent”); 6,961,834 (the “834
7 Patent”); 7,191,273 (the “273 Patent”); 6,816,814 (the “814
8 Patent”); and 7,299,155 (the “155 Patent”) (collectively, the
9 “Sonics Patents-in-Suit”) by the Arteris Accused Products
10 (including, but not limited to, Arteris FlexNoC, Arteris
FlexWay, Arteris NoCcompiler, FlexArtist, FlexExplorer,
FlexVerifier, NoCverifier, and Danube Network on a Chip
Intellectual Property Library). Sonics has served its
preliminary infringement contentions, and Arteris, Inc. has
served its invalidity contentions.

11 On January 27, 2012, Arteris, S.A.S. filed a complaint,
12 alleging infringement of United States Patents Nos. 7,574,629
13 and 7,769,027 (collectively, the “Arteris Patents-in-Suit”).
14 This case is assigned to Judge Alsup. Sonics has since filed
15 counterclaims against Arteris, S.A.S. alleging that the Arteris
16 Accused Products each infringe some or all of the same seven
17 patents Sonics is asserting against Arteris, Inc. in *Sonics v.*
18 *Arteris, Inc.* The parties served their preliminary
19 infringement contentions on May 10, 2012. The parties
20 served their invalidity contentions on June 25 and 26, 2012.

21 The Parties have identified several individuals likely to be in
22 possession of relevant information. An important category of
23 such individuals is the named inventors of the Arteris Patents-
24 in-Suit. Mr. Cesar Douady, who resides and works in France,
25 is a named inventor on both the Arteris Patents-in-Suit. Mr.
26 Douady is a former employee of Arteris, S.A.S.

27 8. Evidence to be obtained or
28 other judicial act to be
performed:
29 It is respectfully requested that an appropriate French judicial
30 authority ask Mr. Douady to appear for a deposition. Given
31 the attorneys’ scheduling constraints, Sonics would like to
32 conduct this deposition preferably in late July, 2012, and
therefore respectfully requests that this Letter of Request be
33 executed as expeditiously as possible.

34 9. Identity and address of any
35 person to be examined:
36 Cesar Douady
37 DxO Labs SA
38 3 rue Nationale
39 92100, Boulogne-Billancourt
40 France
41 Phone: 33 1 55 20 55 99
42 Fax: 33 1 55 20 55 98

1 10. Questions to be put to the
2 person to be examined or
3 statement of the subject
4 matter about which he is to
5 be examined:

Mr. Douady will be examined in his personal capacity, as one of the inventors of the Arteris Patents-in-Suit. The subject matter about which Mr. Douady will be examined will pertain to the general characteristics, inventorship, alleged infringement and validity of the Arteris Patents-in-Suit. As Mr. Douady is also a former Chief Technology Officer of Arteris, S.A.S., he may also be examined on the design and development of the Arteris Accused Products.

6 11. Documents or other
7 property to be inspected:

It is respectfully requested that an appropriate French judicial authority ask Mr. Douady to produce at his deposition any documents that are in his possession, custody or control and that pertain to (i) the Arteris Patents-in-Suit, including, but not limited to, inventor notebooks or any documents showing conception or reduction to practice of inventions reflected in the Arteris Patents-in-Suit; (ii) the design and development of the Arteris Accused Products; and (iii) any communications with Arteris regarding Sonics, or the *Sonics, Inc. v. Arteris, Inc.* (Case No. 4:11-CV-05311-SBA) or *Arteris, S.A.S. v. Sonics, Inc.* (Case No. 12-CV-00434-WHA) lawsuits.

12 12. Any requirement that the
13 evidence be given on oath
14 or affirmation and any
15 specific form to be used:

It is respectfully requested that Mr. Douady's answers to the questions posed to him be under oath, under penalty of perjury.

16 13. Special methods or
17 procedures to be followed:

None at this time.

18 14. Request for notification of
19 the time and place for the
20 execution of the Request
21 and identity and address of
22 any person to be notified:

Arteris, S.A.S.

6 Parc Ariane – Immeuble Mercure
Boulevard des Chenes – 78284 Guyancourt Cedex – France

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13 15. Request for attendance or
14 participation of judicial
15 personnel of the requesting
16 authority at the execution
17 of the Letter of Request:
18

19 16. Specification of privilege
20 or duty to refuse to give
21 evidence under the law of
22 the State of origin:
23

24 17. The fees and costs incurred
25 which are reimbursable
26 under the second paragraph
27 of Article 14 or under
28 Article 26 of the
Convention will be borne
by:
29

30 None at this time.
31

32 Mr. Douady may refuse to answer a question or produce a
33 requested document only where doing so would disclose a
34 privileged communication with counsel or where doing so
35 would disclose work performed under the direction of an
36 attorney.
37

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13 || 18. Date of Request: July 3, 2012

14 19. Signature and seal of the requesting authority:

Kandis A. Westmore
United States Magistrate Judge