

EXHIBIT I

Gazdzinski & Associates, P.C.

INTELLECTUAL PROPERTY LAW

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April 7, 2017

Mr. Gary Chen
Chairman & CEO
UDE Corporation
8F-1, No. 58, Tongde 11th St., Taoyuan Dist.
Taoyuan City 33071
Taiwan

Re: Pulse ICM and Related Intellectual Property

Dear Mr. Chen:

We represent Pulse Electronics (“Pulse”) in its intellectual property matters. We have been forwarded your letter dated March 6, 2017 (hereinafter “Response”) that was submitted in response to Pulse’s letter dated March 4, 2017. Unfortunately, Pulse was perplexed by the positions that you have taken in this Response, and view it as not addressing the substantive issues pointed out in their last letter.

After detailed review, we believe that your Response both (I) misapplies the law regarding patents (in any country), including setting forth *no* non-infringement positions whatsoever for any UDE products with respect to *any* Pulse patents; and (II) provides a deficient and ill-reasoned invalidity position, each as now discussed in greater detail.

Analysis

(I). We remind you that only one valid claim of a patent need be infringed for liability to exist. In contrast, *every* infringed claim must be shown to be invalid or unenforceable; hence, your analysis of only a small percentage of the Pulse claims in the Response is *not* exculpatory of UDE’s behavior.

In that UDE appears to make *no* assertions regarding non-infringement of any of the Pulse patents identified, we assume that UDE has no such arguments. As discussed below, UDE appears to predicate its entire “defense” on attempting to invalidate exemplary claims of each of the patents. It also misstates the law in its Response, apparently conflating public use, prior art, and non-infringement (“*Since the technology of US [patents] should be public used or prior art, so we consider that the corresponding exemplary structure mentioned in these four patents should not infringe.*” {sic}).

Moreover, you should also be aware that even if, for sake of argument, other suppliers are making, using, or selling products which would infringe one or more of the Pulse patents, that in no way excuses UDE from its demonstrated infringement of these Pulse patents.

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(II). Regarding the alleged invalidity analyses offered by UDE in the Response, these analyses fail in numerous regards:

a. Firstly, with regards to U.S. Patent No. 6,593,840 (hereinafter, “the ‘840 Patent”), the two art references cited in your Response do not appear to constitute prior art as to the ‘840 Patent. The ‘840 Patent was filed on January 31, 2001 and claims priority to a provisional application that was filed on January 31, 2000. However, Chinese Publication No. CN2596615Y referenced in your Response appears to have a priority date of October 23, 2002, which is almost two years later than the filing of the ‘840 Patent and almost three years after the priority provisional application filing date for the ‘840 Patent. Similarly, Chinese Publication No. CN2599819Y referenced in your Response would also not appear to constitute prior art as to the ‘840 Patent, as the earliest priority date for this publication would appear to be September 11, 2002.

b. Further, with regards to U.S. Patent No. 9,178,318 (hereinafter, “the ‘318 Patent”), you appear to reference three publications in your Response, namely: (1) Chinese Publication No. CN2596618Y; (2) Chinese Publication No. CN2599718Y; and (3) Republic of China (Taiwan) Publication No. M396525. However, many of the referenced figures in your Response do not appear in any of these cited references (see pages 11 and 12 of your Response, which purports to be from Republic of China (Taiwan) Publication No. M396525; however, no such figures/disclosure appears to be present, nor do these figures appear to be present in either of Chinese Publication No. CN2596618Y or Chinese Publication No. CN2599718Y).

c. With regards to U.S. Patent No. 6,773,302 (hereinafter, “the ‘302 Patent”), the Response only includes a very cursory analysis of Claim 1 that ignores: (1) reasoning for why the references cited in your Response are properly combinable under U.S. law; (2) ignores other potentially relevant claims of the ‘302 Patent; and (3) fails to adequately address each of the features present within exemplary Claim 1. For example, you state “*the protruding portion of PCB is from the top to the bottom in the vertical direction which is totally different structure as wrote in paragraph 5*” of the ‘302 Patent; however, assuming *arguendo* that this is a proper defense to infringement (which we do not believe it is), your Response completely ignores other relevant claims within the ‘302 Patent, including claims that do *not* rely on this particular claimed feature. As but one example, Claim 6 (and e.g., dependent Claim 7) include(s) other claimed features that are neither addressed in your Response, nor are present within any of the cited references contained within your Response.¹

d. Lastly, with regards to U.S. Patent No. 7,959,473 (hereinafter, “the ‘473 Patent”), similar deficiencies within your Response as to the ‘302 Patent are also present within your wholly cursory analysis of Claim 1 of the ‘473 Patent, namely: (1) reasoning for why the references cited in your Response are properly combinable; (2) ignores other potentially relevant claims of the ‘473 Patent; and (3) fails to adequately address each of

¹ See also, for example, Claims 3 – 10, 13, and 14 of the ‘302 Patent.

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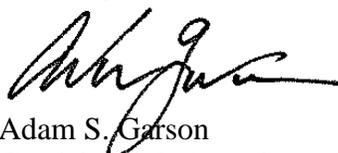
the features present within exemplary Claim 1. For example, neither of Chinese Publication No. CN2596615Y and Chinese Publication No. CN2599819Y appear to teach or suggest, *inter alia*, “wherein said plurality of channels allow for the routing of wire between the electronic component receiving space and the lower conductive terminal portions internal to an outer periphery formed by mated pairs of insert body elements.”

Summary

In that UDE appears to not be taking Pulse’s concerns seriously (as evidenced by its legally deficient and ill-reasoned Response(s) and misapplication of the patent laws), we must conclude that UDE is not participating in this dialogue in good faith, and has no intent of ceasing its behavior identified in Pulse’s March 4, 2017 letter.

If you have any questions or wish to discuss this matter directly, please do not hesitate to contact me.

Sincerely,



Adam S. Garson
Gazdzinski & Associates, PC

cc: William Malherbe – Pulse Engineering