



Ouster Files Patent Infringement Complaint with ITC Against Hesai and Seeks to Bar the Infringing Products from the United States

April 12, 2023

Hesai has had multiple patent infringement claims filed against it

Ouster holds one of the largest patent families in the lidar industry, with successful enforcement and defense of its patent portfolio

SAN FRANCISCO--(BUSINESS WIRE)-- [Ouster, Inc.](#) (NYSE: OUST) ("Ouster" or the "Company"), a leading provider of high-performance lidar sensors for the automotive, industrial, robotics, and smart infrastructure industries, announced today that it has filed a patent infringement complaint with the U.S. International Trade Commission (ITC) against Hesai Group (Nasdaq: HSAI) based in Shanghai, China, and related entities, requesting that the Commission institute an investigation under section 337 of the Tariff Act of 1930. Ouster also filed a patent infringement complaint against Hesai in the U.S. District Court for the District of Delaware, seeking an injunction and monetary damages.

Ouster's complaint asks the ITC to investigate unlawful imports of Hesai lidar sensors that infringe on five valid and enforceable patents owned by Ouster relating to lidar technology (U.S. Patents 11,175,405; 11,178,381; 11,190,750; 11,287,515; and 11,422,236). Ouster's complaint requests that the ITC issue a limited exclusion order and a cease and desist order against Hesai and related entities to bar the importation into the United States of Hesai's lidar devices, components, and products that are alleged to infringe Ouster's patents.

Ouster invented digital lidar technology following an engineering breakthrough, resulting in a high-resolution sensor with a simplified architecture based on two silicon chips. Ouster's highly flexible digital platform can be manufactured at scale and unlocks the largest market opportunity with a combination of high-performance and low cost. As a result, Ouster has quickly become a market leader in lidar. Ouster holds one of the largest patent families in the lidar industry with hundreds of granted and pending patents, which have been successfully enforced. Ouster's patents reflect the substantial investments the Company has made in the United States relating to both rotating and non-rotating solid-state lidar systems. Ouster's complaint sets forth how, after the market shifted toward Ouster's digital lidar, Hesai stole Ouster's revolutionary patented technologies and incorporated them into Hesai's competing products.

This is not the first time that a U.S. company has brought a patent infringement claim against Hesai. In 2019, Velodyne Lidar¹ brought a patent infringement lawsuit against Hesai. Hesai settled for payment of millions of dollars upfront and ongoing royalties. Ouster will continue to vigorously enforce its patents until the infringing products are barred.

"We set out to build a lidar company based on a digital approach because we knew that it would make lidar performant, affordable, and ubiquitous. Ouster intentionally built one of the strongest patent portfolios in the industry," said Ouster CEO Angus Pacala. "As companies attempt to copy our digital approach, we will continue to vigorously enforce our intellectual property until the infringing products are barred. Lidar is a critical technology providing vision for advanced automation and smart technologies across supply chains, infrastructure, and defense. The global lidar industry relies on fair competition, and IP must be protected."

About Ouster

Ouster (NYSE: OUST) is a leading global provider of high-resolution scanning and solid-state digital lidar sensors, Velodyne Lidar sensors, and software solutions for the automotive, industrial, robotics, and smart infrastructure industries. Ouster is on a mission to build a safer and more sustainable future by offering affordable, high-performance sensors that drive mass adoption across a wide variety of applications. With a global team and high-volume manufacturing, Ouster supports over 850 customers in approximately 50 countries. Ouster is headquartered in San Francisco, CA, with offices in the Americas, Europe, Asia-Pacific, and the Middle East. For more information, visit www.ouster.com, or connect with us on [Twitter](#) or [LinkedIn](#).

Forward-Looking Statements

This press release contains forward-looking statements within the meaning of the Private Securities 1995. We intend such forward-looking statements to be covered by the safe harbor provisions for forward-looking statements contained in Section 27A of the Securities Act of 1933, as amended (the "Securities Act") and Section 21E of the Securities Exchange Act of 1934, as amended (the "Exchange Act"). Such statements are based upon current plans, estimates and expectations of management that are subject to various risks and uncertainties that could cause actual results to differ materially from such statements. The inclusion of forward-looking statements should not be regarded as a representation that such plans, estimates and expectations will be achieved. Words such as "anticipate," "expect," "project," "intend," "believe," "may," "will," "should," "plan," "could," "may," "continue," "target," "contemplate," "estimate," "forecast," "guidance," "predict," "possible," "potential," "pursue," "likely," and similar expressions are intended to identify forward-looking statements, though not all forward-looking statements use these words or expressions. All statements, other than historical facts, including statements regarding the Company's competitive position and the Company's expectations regarding its patent infringement lawsuit against Hesai, constitute forward-looking statements. All forward-

looking statements are subject to risks and uncertainties that may cause actual results to differ materially from those that we expected, including but not limited to, the Company's ability to protect its intellectual property, risks associated with litigation, as well as the important factors discussed in the Company's Annual Report on Form 10-K for the year ended December 31, 2022, as updated by the Company's other filings with the Securities and Exchange Commission. Readers are urged to consider these factors carefully and in the totality of circumstances when evaluating these forward-looking statements, and not to place undue reliance on any of them. Any such forward-looking statements represent management's reasonable estimates and beliefs as of the date of this press release. While Ouster may elect to update such forward-looking statements at some point in the future, it disclaims any obligation to do so, other than as may be required by law, even if subsequent events cause its views to change.

¹ [Velodyne and Ouster completed a merger of equals on February 10, 2023.](#)

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Source: Ouster, Inc.