UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAMSUNG ELECTRONICS CO., LTD.,

Petitioner,

v.

NETLIST, INC.,

Patent Owner,

_____

Case No. IPR2022-00615

Patent No. 7,619,912

_____

REMOTE VIDEOTAPED DEPOSITION BY VIRTUAL ZOOM OF

ANDREW WOLFE, PH.D.

WEDNESDAY, JANUARY 4, 2023

Reported by:

Ashala Tylor, CSR #2436, CLR, CRR, RPR

JOB NO. 5621734

PAGES 1 - 233

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Samsung v Netlist
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Videotaped deposition of ANDREW WOLFE, PH.D., taken via virtual Zoom, commencing at 9:04 a.m. and ending at 6:38 p.m., on Wednesday, January 4, 2023, before Ashala Tylor, CSR No. 2436, RPR, CRR, CLR.

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A P P E A R A N C E S (continued)

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	Mr. Chandler	215

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Wednesday, January 4, 2023

9:04 a.m.

--o0o--

ANDREW WOLFE, PH.D.

being first duly sworn or affirmed to testify to the truth, the whole truth, and nothing but the truth, was examined and testified as follows:

EXAMINATION

BY MS. ZHONG: 09:04

Q. Dr. Wolfe, can you pull up Exhibit 1032, 09:04

Exhibit 1029, Exhibit 1030. You have them on your 09:05

local computer and -- 09:05

THE REPORTER: I'm sorry, Ms. Zhong, I'm 09:05

having a difficult time hearing you. 09:05

BY MS. ZHONG: 09:05

Q. Okay. Dr. Wolfe, can you pull up 09:05

Exhibits 1032, 1030 and 1029. 09:05

(Exhibit 1029 was marked for 09:05

identification and attached 09:05

hereto.) 09:05

(Exhibit 1030 was marked for 09:05

identification and attached 09:05

hereto.) 09:05

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(Exhibit 1032 was marked for identification and attached hereto.) 09:05

THE WITNESS: All three of them you want me to pull up? 09:05

BY MS. ZHONG: 09:05

Q. Yes. You have them on your local computer, correct? 09:05

A. I do. 09:05

Q. Okay. Let me know when you have them. 09:05

A. I have them. 09:05

Q. What is Exhibit 1032? 09:05

A. It is the PC2100 and PC1600, DDR SDRAM Registered DIMM, D-I-M-M, Design Specification, Revision 1.3 from January 2002. And we often refer to it as a version of JEDEC Standard 21-C. 09:05 09:06 09:06

Q. How does JEDEC Standard 21-C differ from Exhibit 1030? 09:06 09:06

A. They are different documents describing different things. 09:06 09:06

Q. What does Exhibit 1030 describe? 09:06

A. That is the JESD79 standard or specification from June 2000. And it describes various aspects of double-data-rate DRAM chips primarily. 09:06 09:06 09:06 09:07

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Q. Okay. So Exhibit 1030 is directed to the 09:07
SDRAM's memory device itself, correct? 09:07
A. Primarily, yes. 09:07
Q. Okay. And Exhibit 1032 describes the 09:07
memory module level, correct? 09:07
A. For one particular type of memory module, 09:07
that is correct. 09:07
Q. Okay. So Exhibit 1032 describes in 09:07
particular the registered DIMM memory module, 09:07
correct? 09:07
A. A particular type or a particular set of 09:07
types of registered DIMM memory modules. There's 09:07
other information in there as well, but that's its 09:07
primary purpose. 09:07
Q. Okay. And the operation of DDR SDRAM 09:08
device itself you refer to Exhibit 1030; is that 09:08
right? 09:08
A. Exhibit 1030 includes a multitude of 09:08
specific characteristic specifications for a 09:08
packaged double-data-rate SDRAM chip at that time. 09:08
Q. Okay. Why don't we go to Exhibit 1032, 09:08
page 16. 09:08
A. Okay. 09:08
Q. On page 16, lower left corner, do you see 09:08
a bunch of signals that's going into an element 09:08

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1 called a register? Do you see that diagram there? 09:08
2 A. I do see that diagram. 09:08
3 Q. Okay. And what is a register shown on 09:09
4 page 16 of Exhibit 1032? 09:09
5 A. Well, what a register is always depends on 09:09
6 context. But in this particular context, that would 09:09
7 be a component on this module that can temporarily 09:09
8 store signal values. 09:09
9 So it would store the input values based 09:09
10 on certain values of the PCK, which stands for 09:09
11 clock, and PCK bar signals, and make those available 09:09
12 at the outputs on the right. 09:09
13 Q. Okay. So the signals on the left of the 09:09
14 register are input signals that -- (indiscernible.) 09:09
15 THE REPORTER: I'm sorry, Counsel. I'm 09:10
16 having a difficult time hearing you. One more time, 09:10
17 please. 09:10
18 BY MS. ZHONG: 09:10
19 Q. So the signals to the left of the element 09:10
20 of register are input signals received by the DIMM 09:10
21 from the computer system; is that correct? 09:10
22 A. In this diagram, the signals that are on 09:10
23 the left of the box marked "Register" would come 09:10
24 from -- they are input signals to the DIMM, and in 09:10
25 most cases they would come from a computer system. 09:10

Q. Okay. And the signals that's to the right 09:10
of the box labeled "Register," those are output 09:10
signals; is that correct? 09:10
A. From the perspective of this particular 09:10
register they are output signals. They would be 09:11
input signals to some other device. 09:11
Q. Okay. And so the signals to the right of 09:11
the register are output signals from the perspective 09:11
of the register and -- but they are input signals to 09:11
the SDRAM devices; is that correct? 09:11
A. They -- each of those would be an input 09:11
signal to one or more SDRAM devices. 09:11
Q. So the answer to my question is "yes"; is 09:11
that correct? 09:11
A. I don't know whether or not we're saying 09:11
the same thing. 09:11
The register will output each of the 09:11
signals shown to the right of the register. Those 09:11
are then provided -- but some are provided to some 09:11
SDRAM devices. Some are provided to others. Some 09:11
are provided to all of them. 09:11
Q. Okay. And there are different types of 09:11
DIMMs; is that correct?
A. In the world, that is true, there are 09:12
different type of DIMMs in the world. 09:12

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Q. Okay. Are you familiar with a type of 09:12
DIMM called RIMM, which I believe is specific to the 09:12
Rambus-designed memory modules? 09:12
A. I don't recall it by that name, but there 09:12
were a number of Rambus memory modules in the 09:12
2000-2005 time frame typically. 09:12
Q. Okay. Do you recall what kind of input 09:12
signals do those RIMMs receive? 09:12
A. Not in detail. The RIMM -- the Rambus 09:12
DRAM memory modules used a packetized communication 09:13
scheme that used a narrower communication channel 09:13
than the most common other DIMMs at the time. 09:13
Q. Okay. So, for example, the Rambus memory 09:13
module -- let me rephrase that. 09:13
So the Rambus DRAM memory module do not 09:13
receive, for example, chip select signal, band 09:13
address signal, RAS bar, CAS bar, WE bar, and 09:13
address this as shown on page 16 of Exhibit 1032; is 09:13
that correct? 09:14
MR. CHANDLER: Objection. Form. 09:14
THE WITNESS: Again, I would need to look 09:14
at that specification to recall all the details. 09:14
It's been 20-plus years since I've read it. But my 09:14
recollection is that the same information was 09:14
conveyed but not in the exact same physical form. 09:14

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BY MS. ZHONG: 09:14

Q. Okay. Let me see -- let me introduce a 09:14

document and see if this will jog your memory. 09:14

(Exhibit 2100 was marked for 09:15

identification and attached 09:15

hereto.) 09:15

BY MS. ZHONG: 09:15

Q. So, Dr. Wolfe, can you please refresh your 09:15

Exhibit Share link? 09:15

A. Yes. 09:15

Q. And do you see a newly marked 09:15

Exhibit 2001 -- 2100, EX2100? 09:15

A. EX2100. 09:15

Q. Yes. Can you please open it or download 09:15

it. 09:15

A. Okay. 09:15

Q. Exhibit 21 -- okay. Do you have it? 09:15

A. I do. 09:15

Q. So Exhibit 2100 is a Samsung data sheet 09:15

for RIMM, R-I-M-M, module based on 256 megabits or

288 megabits, 32 bank, 16K/32ms Rambus DRAMs.

Can you go to pages 2, 3, 4, and take a 09:16

look. 09:16

MR. CHANDLER: And, Annita, let me just 09:16

lodge an objection to the exhibit. It's -- appears 09:16

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to be outside the scope of his declaration. Also 09:16
doesn't appear to be -- it doesn't appear to be 09:16
evidence that I can -- appears to be hearsay. 09:16
BY MS. ZHONG: 09:16
Q. Dr. Wolfe, can you please take a look at 09:16
pages 2 through 4. 09:16
A. I see them. 09:16
Q. Okay. The signals listed on pages 2 09:16
through 4, the input signals to the DIMM, for this 09:16
particular DIMM. 09:16
A. I'm sorry, I didn't understand the 09:17
question. 09:17
Q. So on page 2 through 4 there are a number 09:17
of pins listed on those pages, correct? 09:17
A. They are called pads in this case. But 09:17
there are a number of connections to a module that 09:17
are described on these pages. 09:17
Q. Okay. So the pads that's listed on those 09:17
pages are the -- how do you say? -- the input and 09:17
output pads for the -- for the memory module; is 09:17
that correct? 09:17
A. Some of them probably are. To get into 09:17
the details, I think, requires reviewing other 09:17
documents. 09:17
Q. Okay. Can you tell me which pin would be 09:17

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check select signal coming in from? 09:18
A. Not from a cursory review of this document 09:18
I can't, no. There are other documents, the ones 09:18
intended to review together with this, that describe 09:18
how these signals are used in more detail. 09:18
Q. Okay. Do you see any reference to chip 09:18
select signal here in this document? 09:18
A. There may or may not be. Again, I 09:18
don't -- I don't know the definition of the 09:18
functionality of every pin from this document alone. 09:18
There are other documents that were 09:18
supplied at the time by Rambus that would describe 09:18
how each pin was used. And for this particular kind 09:18
of a DIMM, my recollection was that the DIMMs -- 09:18
that pins or pads had multiple functions. 09:18
Q. Okay. Are the signals -- you mentioned 09:19
that for Rambus memory module the address and the 09:19
control signals are packetized; is that correct? 09:19
THE REPORTER: I'm sorry, are what? I'm 09:19
sorry, Counsel, the last part of your question? 09:19
BY MS. ZHONG: 09:19
Q. You mentioned that the Rambus memory 09:19
module -- let me withdraw and reask. 09:19
So in the Rambus memory module, the 09:19
control and address information is packetized; is 09:19

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that correct? 09:19
MR. CHANDLER: Objection. Form. 09:19
THE WITNESS: That was my recollection as 09:19
to certain Rambus memory modules that I was familiar 09:19
with in the early 2000s. I don't know, from what 09:19
I've seen here right now, whether or not this 09:20
particular module is consistent with the ones that I 09:20
previously studied. 09:20
BY MS. ZHONG: 09:20
Q. And how does a packetized control and 09:20
address information differ from the signaling 09:20
protocol that we see on page 16 of Exhibit 1032? 09:20
A. There are similarities and there are 09:20
differences, and it would depend on the specifics of 09:20
the specific situation. 09:20
But I think that the biggest difference is 09:20
that in the Rambus protocols that I was familiar 09:20
with at the time, there was -- there were more pins 09:20
that had multiple functions. 09:20
Q. So is there a discrete chip select signal 09:21
as in Exhibit 1032? 09:21
A. Does what have a discrete chip select 09:21
signal? 09:21
Q. Let me put it this way. When the control 09:21
and address information is set by the computer 09:21

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system -- let me reask. 09:21
What do you mean by the control and 09:21
address information is packetized? 09:21
A. I'm not sure what you're referring to. 09:21
Q. Well, you said in the Rambus memory module 09:21
the control and address information is packetized, 09:21
correct? 09:22
A. I don't recall if that's exactly what I 09:22
said. But in the Rambus memory modules that I was 09:22
familiar with at one point in time, which again are 09:22
only a subset of the Rambus products, the control 09:22
and address -- as best as I can recall, I don't have 09:22
that protocol in front of me -- the control and 09:22
address data would be broken up into chunks, I 09:22
believe, 8 bits at a time, and sent as a sequence 09:22
over a limited number of wires and then 09:22
reconstituted on the module itself into individual 09:22
signals. 09:22
Q. Okay. So in the Rambus memory module that 09:22
you are familiar with from the early 2000s, the 09:22
control and address information is set in bits and 09:22
reconstituted by a larger component on the memory 09:23
module; is that correct? 09:23
MR. CHANDLER: Object to form. 09:23
THE WITNESS: Now, first understanding 09:23

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clearly that this is -- that the module in 09:23
Exhibit 2100 is not one that I'm familiar with. 09:23
But my recollection is that, as I stated 09:23
before, that in the Rambus protocol for the devices 09:23
that I was familiar with, control and address 09:23
information would be sent along a relatively narrow 09:23
channel as a sequence of packets and then 09:23
reconstituted into individual signals by the logic 09:23
functions on the -- within the Rambus chips. 09:24
BY MS. ZHONG: 09:24
Q. Okay. 09:24
A. But again, I haven't seen those documents 09:24
in a long time, so I really can't tell you any of 09:24
the details about it without reviewing them again. 09:24
Q. When you say "reconstituted into 09:24
individual signals by the logic function within the 09:24
Rambus chips," what do you mean by "reconstituted"? 09:24
A. Again, it's been a long time since I 09:24
reviewed this protocol. But my best recollection is 09:24
that the individual selection signals to select 09:24
columns, rows, banks, and die would be reconstituted 09:25
within some logic somewhere on the memory module. 09:25
Q. So the form in which the logic function 09:25
receives the information from the memory system -- 09:25
let me withdraw it and reask. 09:25

So the input -- inputs that the logic 09:25
function receives from the computer system differs 09:25
from the output of that logic function; is that 09:25
correct? 09:25
MR. CHANDLER: Object to form. 09:25
THE WITNESS: I don't understand your 09:25
question. 09:25
BY MS. ZHONG: 09:25
Q. Which part don't you understand? 09:25
A. I don't understand what the question is. 09:25
Q. So the logic function on the Rambus DIMMs 09:26
that you are familiar with receives packetized 09:26
control and address information; is that correct? 09:26
A. In a very general sense. Again, I 09:26
haven't -- I haven't reviewed that protocol in 09:26
decades. 09:26
Q. Okay. And that logic function then 09:26
reconstitute those that receive the packetized 09:26
information and generates signals for output to the 09:26
DRAMs; is that correct? 09:26
MR. CHANDLER: Objection. Form. 09:26
THE WITNESS: Yeah, it depends how you're 09:26
defining some of those terms. I'm not sure what -- 09:26
what -- I mean I answered the question using 09:26
language I was comfortable with, but I don't know 09:26

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how -- what -- how you're defining some of the words 09:26
in your question. 09:26
BY MS. ZHONG: 09:27
Q. Which words don't you understand? 09:27
A. Can you go through your question again? 09:27
In particular, I don't understand what you mean when 09:27
you say the signals go to the DRAM. 09:27
Q. And the logic function on the Rambus 09:27
memory module you're familiar with then 09:27
reconstitutes the control and address information 09:27
that it receives and it generates output signals; is 09:27
that correct? 09:27
A. It depends what you mean by output 09:27
signals. But in the very broadest sense where there 09:27
is at least some logic gate that outputs that 09:27
signal, that would be true based on my recollection 09:27
without reviewing the protocol. 09:27
Q. Okay. And the signals that are output by 09:27
the logic function, where do they go? 09:27
A. I don't remember. Again, I haven't seen 09:28
this design in decades. I'd have to see the actual 09:28
design to give you any more details. 09:28
Q. Do they go to the memory devices on the 09:28
module? 09:28
A. Like I said, I don't -- I don't recall. 09:28

Q. And is the -- and is the information 09:28
that's output by the logic function still 09:28
packetized? 09:28
MR. CHANDLER: Objection. Form. 09:28
THE WITNESS: Where and when? 09:28
BY MS. ZHONG: 09:28
Q. Pardon? 09:28
A. Where and when? 09:28
Q. You mention that the logic function would 09:28
take the packetized control and address information 09:29
it receives and reconstitute to generate the output 09:29
signal. So is that output signal still packetized? 09:29
MR. CHANDLER: Objection. Form. 09:29
THE WITNESS: Again, you know, at some 09:29
point the details become important and we have to 09:29
look at an actual circuit and look at an exact spot 09:29
in the circuit. 09:29
But eventually those -- that information 09:29
about control and addresses is not in the same 09:29
packetized form that it is transmitted over the 09:29
Rambus channel. But -- but, you know, it still -- 09:29
it's sequential. But at some point we would 09:29
probably not describe it as packetized anymore. 09:29
BY MS. ZHONG: 09:29
Q. Okay. So when the information is sent to 09:29

the DRAM, is it still packetized? 09:30

MR. CHANDLER: Objection. Form. 09:30

THE WITNESS: We need to look at an actual 09:30

circuit. I'm not sure what -- we'd have to identify 09:30

exactly where we're talking about and draw 09:30

boundaries around what you're calling the DRAM and 09:30

what you're not. 09:30

And again, I don't -- I don't recall the 09:30

exact signal paths on those chips from 20 years ago. 09:30

BY MS. ZHONG: 09:30

Q. Okay. What about in Perego, what kind of 09:30

address control information format does Perego stem 09:30

receive? 09:30

Let me withdraw and ask -- reask. 09:30

So the Perego, P-R-E-G-O [sic], what kind 09:30

of address control information -- 09:31

MR. CHANDLER: Just to be clear, Annita, 09:31

P-E-R-E-G-O. The transcript picked it up the wrong 09:31

way, so I think the primary reference was 09:31

misspelled. 09:31

BY MS. ZHONG: 09:31

Q. Okay. Then let me just withdraw and 09:31

reask. 09:31

So for Perego, which I believe is 09:31

Exhibit 1034 -- 09:31

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A. 1035. 09:31
(Exhibit 1035 was marked for 09:31
identification and attached 09:31
hereto.) 09:31
BY MS. ZHONG: 09:31
Q. 1035. So Exhibit 1035, Perego, 09:31
P-E-R-E-G-O, in what format is the control address 09:31
information received from the computer system by 09:31
Perego's memory module? 09:31
A. I'm not sure what you mean by format. 09:31
Perego contemplates a wide variety of different 09:31
memory technologies, including various kinds of 09:32
memory, including synchronous DRAMs, DDR DRAMs, 09:32
direct Rambus memory devices, XDR memory devices, 09:32
SRAM, which stands for static RAM, ferroelectric 09:32
RAM, magnetoresistive RAM, flash memory or ROM. 09:32
And while there are certain 09:32
characteristics of the DIMM that are described in 09:32
various embodiments, I don't think that there's a 09:32
particular format that's required for all those 09:32
different memory types. 09:32
Q. Does Perego ever describe that its DIMM 09:32
received the type of information as shown in 09:32
Exhibit 1032, page 16? 09:33
A. As I said, Perego contemplates a variety 09:33

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1 of different input specifications. In fact, that's 09:33
2 one of the whole points of Perego is that it 09:33
3 contemplates a wide variety of different DIMM 09:33
4 connection widths. 09:33
5 Q. But the DIMM -- 09:33
6 A. It does describe conventional DIMM 09:33
7 modules. I don't recall off the top of my head 09:33
8 whether or not he specifically refers to the module 09:33
9 that is described in JEDEC Standard 21-C. That was 09:34
10 disclosed in the IDS for Perego. 09:34
11 And certainly a person of ordinary skill 09:34
12 in the art at the time would have been familiar with 09:34
13 JEDEC Standard 21-C. And I think that it is 09:34
14 consistent with and compatible with Perego, but I 09:34
15 don't recall a specific disclosure of using that 09:34
16 exact standard together with Perego. 09:34
17 Q. And Perego actually does not want to use 09:34
18 the control and address bus architecture? It moves 09:34
19 for the point-to-point connection architecture; is 09:35
20 that correct? 09:35
21 A. Are you pointing -- are you talking about 09:35
22 a specific statement in Perego? I -- I -- that 09:35
23 doesn't ring a bell at the moment. 09:35
24 Q. What kind of architecture does Perego use? 09:35
25 A. What do you mean by architecture? 09:35

1 Perego describes architecture as including 09:35
2 a configurable width buffered module having a 09:35
3 configurable width buffer device. 09:35
4 Q. And it's using a point-to-point connection 09:35
5 instead of a multidrop bus connection; is that 09:35
6 correct? 09:35
7 MR. CHANDLER: Objection. Form. 09:35
8 BY MS. ZHONG: 09:36
9 Q. Dr. Wolfe, can you answer the question? 09:36
10 A. I'm looking. I mean, certainly at least 09:36
11 the bulk of the embodiments in Perego connect to the 09:36
12 computer with a point-to-point connection. I don't 09:36
13 recall whether or not there's any indication 09:36
14 limiting Perego to a point-to-point connection. 09:36
15 And certainly JEDEC Standard 21-C can be 09:36
16 compatible with a point-to-point connection such as 09:36
17 Perego. 09:36
18 Q. Perego actually specifically only mentions 09:37
19 packetized signaling, correct? 09:37
20 A. I'd have to go back through the entire 09:37
21 reference to confirm that. That's certainly -- 09:37
22 Q. Why don't you look at -- 09:37
23 A. -- not true because -- 09:37
24 THE REPORTER: I'm sorry, one at a time, 09:37
25 please. 09:37

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BY MS. ZHONG: 09:37
Q. Can you please a look at Exhibit 1035, 09:37
column 9, line -- 09:37
MR. CHANDLER: I don't think he was 09:37
finished. 09:37
THE WITNESS: I didn't finish my previous 09:37
answer. I disagree with your previous answer -- 09:37
with your previous question. 09:37
So column 9, 53? 09:37
BY MS. ZHONG: 09:37
Q. Column 9, lines 50 to 53. 09:37
A. Yes. 09:38
Q. What kind of a format is the control 09:38
information/address information provided in this 09:38
disclosure? 09:38
A. Well, this is a disclosure in accordance 09:38
with an embodiment. And in this particular 09:38
embodiment, information -- control information and 09:38
addresses are contained in packets. 09:38
Q. Okay. And can you also take a look at 09:38
column 13, lines 49 to 59. 09:38
In what format is the control and address 09:38
information provided in this disclosure? 09:38
A. This is -- well, let me make a number of 09:39
comments about this. One, this is, again, an 09:39

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1 embodiment. Also, it's filled with permissive 09:39
2 language. But this says any multiplexed combination 09:39
3 of control, address information, and data intended 09:39
4 for memory devices. 09:39
5 And, of course, the traditional DIMMs like 09:39
6 JEDEC Standard 21-C do use multiplexed combinations 09:39
7 of control, address and data. 09:39
8 Q. And in the -- in the traditional DIMM, is 09:39
9 the multiplex control and address information 09:39
10 demuxed from the data? 09:40
11 THE REPORTER: I'm sorry, Counsel. The 09:40
12 last part of your question? 09:40
13 MS. ZHONG: Demux, D-E-M-U-X. 09:40
14 THE WITNESS: No, not in a traditional 09:40
15 DIMM that would be compliant with JEDEC Standard 09:40
16 21-C. It would not have that characteristic. 09:40
17 BY MS. ZHONG: 09:40
18 Q. Okay. So this is not really describing a 09:40
19 standard JEDEC compliant DIMM control and address 09:40
20 signaling protocol, correct? 09:40
21 MR. CHANDLER: Objection. Form. 09:40
22 THE WITNESS: No, I think that's 09:40
23 incorrect. As I said, this is an embodiment. It's 09:40
24 permissive. And the language that you asked about 09:40
25 in your question is only in a "for example." So I 09:40

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1 think that it -- 09:41
2 BY MS. ZHONG: 09:41
3 Q. Well, okay -- 09:41
4 A. I'm sorry, you can't keep interrupting my 09:41
5 answers. 09:41
6 Q. You are not answering my question. So 09:41
7 let's try it again. 09:41
8 So in the specific example -- 09:41
9 A. I'm sorry, I didn't finish answering the 09:41
10 last question. If you're not going to let me answer 09:41
11 them, could you please strike the questions? 09:41
12 Q. So in the specific example given here, we 09:41
13 agree that a standard JEDEC compliant DIMM does not 09:41
14 perform the step of extracting address and control 09:41
15 information from the data; is that correct? 09:41
16 MR. CHANDLER: Objection. Form. 09:41
17 THE WITNESS: When you say "here," exactly 09:41
18 what line are you talking about? 09:41
19 BY MS. ZHONG: 09:41
20 Q. For example, column 13, lines 49 through 09:42
21 54. Do you see the discussion of extracting address 09:42
22 and control information from the data? Do you see 09:42
23 that disclosure? 09:42
24 A. On lines 53 and 54 I see -- 09:42
25 Q. Okay. 09:42

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A. -- a permissive statement that says "which may, for example, extract the address and control information from the data." 09:42

Q. Okay. And does the standard JEDEC compliant memory module extract address and control information from the data? 09:42

MR. CHANDLER: Objection. Form. 09:42

THE WITNESS: There are many JEDEC standards. 09:42

BY MS. ZHONG: 09:42

Q. Are you aware of any that actually does this? 09:42

A. I don't recall one way or another. 09:43

Q. Are you aware of any JEDEC compliant memory module when the signaling scheme that you relied on in your declaration that actually does the extraction of address and control information from the data? 09:43

MR. CHANDLER: Objection. Form. 09:43

THE WITNESS: I don't recall any JEDEC standard that I relied on as an exhibit for my declaration that extracts the address and control information from the data. 09:43

BY MS. ZHONG: 09:43

Q. Okay. And do you recall of any JEDEC 09:43

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standards you relied on in which control information 09:44
and address information is decoded and separated 09:44
from multiplex data? 09:44
MR. CHANDLER: Objection. Form. 09:44
THE WITNESS: I don't recall that being in 09:44
any of the JEDEC specifications that I relied on as 09:44
exhibits to my declaration. 09:44
BY MS. ZHONG: 09:44
Q. Do you recall that being the case in any 09:44
of the exhibits that you relied on? 09:44
A. Well, sure. It's in Perego. 09:44
Q. Okay. So aside from Perego, do you recall 09:44
whether any of the memory modules in any references 09:44
other than Perego that actually does control 09:44
information, address information, decoding and 09:45
separation from multiplex data? 09:45
A. I don't recall one way or the other. 09:45
THE REPORTER: Ms. Zhong, could you sit up 09:45
so I can see you? It would make it easier to hear 09:45
you. Thank you. 09:45
MS. ZHONG: It may be difficult because 09:45
that's taking away from -- that's kind of forcing me
to face away from the phone.
Q. Can you turn to column 21, line 46 to 50? 09:46
A. Of Perego? 09:46

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Q. Yes. 09:46
A. Okay. 09:46
Q. Okay. So in the specific example here, 09:46
again it is discussing this decoding packetized 09:46
transmission from controller; is that correct? 09:46
A. Column 21, lines 46 through 50, does talk 09:46
about an embodiment where repeaters decode packets 09:46
transmitted from the controller which are then 09:46
directed over one or more, or none of repeater 09:46
links. 09:47
Q. Okay. So do any of the JEDEC 09:47
specifications you relied on utilize packetized 09:47
transmission from controllers? 09:47
A. Yes. If you -- if you use that term 09:47
broadly, yes. 09:47
Q. When you say "use that term broadly," what 09:47
do you mean? 09:47
A. There are packets that are transmitted 09:47
from controllers to memory modules in DDR SDRAM 09:47
designs. 09:47
Q. It's transmitted to DDR SDRAM. What about 09:47
to the module? Is it also packetized? 09:47
A. There are portions of the information that 09:47
are packetized. 09:47
Q. Can you please give me an example with 09:47

reference to Exhibit 1032 which portion is 09:47
packetized. 09:47
A. Well, the protocol is not described in 09:47
Exhibit 1032. 1032 is about the physical structure 09:48
of the module. So you need to read that together 09:48
with other documents to understand the protocol. 09:48
Q. So which documents indicate there is 09:48
packetized control and address information being 09:48
sent from the -- from the controller? 09:48
A. Well, that's a different question than you 09:48
asked before. 09:48
Q. Okay. So when you say there's packetized 09:48
transmission, what kind of information was 09:48
packetized? 09:48
A. The one I'm familiar with off the top of 09:48
my head is -- are data bursts. 09:48
Q. What about control and address 09:48
information? So in the JEDEC standards you relied 09:48
on, is any of the control and address information 09:48
packetized and transmitted from the controller to 09:48
the DIMMs? 09:48
A. I don't recall. It wasn't important to my 09:49
analysis, so I haven't looked. 09:49
Q. Sitting here today, are you aware of any 09:49
JEDEC standards at the time of the invention that 09:49

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1 actually used packetized transmission of control and 09:49
2 address information? 09:49
3 A. I don't recall one way or another. There 09:49
4 are lots of JEDEC standards at the time that I was 09:49
5 familiar with, and there are lots of pages in them, 09:49
6 and that's a very narrow issue that was not relevant 09:49
7 to my analysis in. 09:49
8 Q. And you cannot point to any of the 09:49
9 exhibits you relied on that actually discusses 09:49
10 packetized transmission of a control and address 09:49
11 information for a JEDEC compliant memory module; is 09:49
12 that correct? 09:50
13 A. I can't point to one right now off the top 09:50
14 of my head, no. 09:50
15 Q. And for a packetized control and address 09:50
16 information that's being sent from the controller, 09:50
17 logic on the memory module will need to decode them 09:50
18 and reconstitute those signals; is that correct? 09:50
19 A. Not necessarily, no. 09:50
20 Q. Why not? 09:50
21 A. It may not be necessary to decode those 09:50
22 signals. 09:50
23 Q. So if on the -- so if on the memory module 09:50
24 the memory module uses JEDEC compliant SDRAMs, do 09:50
25 those information need to be decoded and 09:50

depacketized? 09:51
A. It would depend which DRAM and how the 09:51
information was encoded in the first place. 09:51
Q. The DDR2, DDR SDRAM specification you 09:51
relied on, those DRAMs. Do they receive packetized 09:51
input? 09:51
A. They can receive packetized data inputs. 09:51
Q. Can they receive packetized control and 09:51
address inputs? 09:51
A. I haven't looked to see whether or not 09:51
they sometimes do or not. 09:51
Q. Well, you are the expert here. You cited 09:51
those documents, specification. 09:51
What kind of a control and address 09:51
information do those JEDEC compliant DDR and DDR2 09:51
memory devices receive? 09:51
A. There's not a single name for it. That's 09:51
why we use a 80-page document to describe the 09:52
protocol. There's a complex protocol for those 09:52
signals and it is described in documents. 09:52
So, for example, Exhibit 1029 describes 09:52
the address and control protocols for DDR2 DRAM 09:52
devices at the time. 09:52
Q. So point me to somewhere in Exhibit 1029 09:52
where the control and address information for the 09:52

SDRAM is received as a packet. 09:52
A. I haven't done that analysis. 09:52
Q. Well, you're familiar with the document, 09:52
right? 09:52
A. I am. 09:52
Q. And you know what a POSITA would have 09:52
known in 2004 and 2005, correct? 09:53
A. With respect to the '912 patent, yes. 09:53
Q. And also with respect to what they would 09:53
have known regarding the JEDEC standards, correct? 09:53
A. Yes. 09:53
Q. Okay. So from a POSITA's perspective, 09:53
would they have known that the SDRAMs that's 09:53
compliant with JEDEC would receive packetized 09:53
control and address information? 09:53
A. It depends how you define "packetized." 09:53
There are packetized aspects to it. 09:53
Q. What's your definition of packetized? 09:53
A. It depends on context. And there was just 09:53
no need to have a definition with respect to the 09:53
JEDEC standards. The actual information is 09:53
disclosed in the documents. So there was no need 09:53
for me to characterize it as packetized or 09:53
nonpacketized. 09:54
Certainly there are packets and 09:54

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information that are sent. So, for example, the 09:54
activate command is sent separately from the read 09:54
command. And one could consider those to be packets 09:54
in certain contexts. 09:54
Q. In what context would they be considered 09:54
to be packetized? 09:54
A. If you define packets as bundles of 09:54
information that are sent at different times on the 09:54
same wire, which would be a pretty common general 09:54
definition of that term. 09:54
Q. Why don't you go to your declaration, page 09:54
93, Table 10. 09:54
A. Okay. 09:54
THE REPORTER: Counsel, what exhibit 09:54
number is that? 09:55
BY MS. ZHONG:
Q. So in Table 10 --
THE REPORTER: Counsel, what exhibit
number is that?
MS. ZHONG: Exhibit 1003. 09:55
(Exhibit 1003 was marked for 09:55
identification and attached 09:55
hereto.) 09:55
THE WITNESS: Okay. 09:55

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BY MS. ZHONG: 09:55
Q. So in Table 10, for each of the row lists 09:55
the signals needed for a particular operation; is 09:55
that correct? 09:55
MR. CHANDLER: Objection. Form. 09:55
THE WITNESS: With respect to a particular 09:55
set of commands for memory devices that are 09:55
consistent with Exhibit 1029, that is correct. 09:56
BY MS. ZHONG: 09:56
Q. Okay. Are those signals received in 09:56
packetized form? 09:56
MR. CHANDLER: Objection. Form. 09:56
THE WITNESS: Again, it depends how you 09:56
define packetized form. But in the broad sense of 09:56
the word "packetized," some of them are. 09:56
BY MS. ZHONG: 09:56
Q. Which ones are? 09:56
A. A15 through A0. 09:56
Q. You mean like the address bits? 09:56
A. Well, A10 is -- 09:56
Q. Go ahead. 09:56
A. A10 is both an address bit and a control 09:56
bit depending on how it's used at various times. So 09:56
there are multiple pieces of information that are 09:56
transmitted in -- in bursts along those wires. 09:56

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1 Other information like the bank address, 09:57
2 although it's shown in this table in a very simple 09:57
3 form, is actually only valid at -- at certain times. 09:57
4 There are also commands that are not 09:57
5 listed in this portion of the table. 09:57
6 Q. Are there separate address pins on which 09:57
7 the information is sent? 09:57
8 MR. CHANDLER: Objection. Form. 09:57
9 THE WITNESS: On which what information is 09:57
10 sent? 09:57
11 BY MS. ZHONG: 09:57
12 Q. So that's separate address pins A0 through 09:57
13 A15; is that correct? 09:58
14 A. Memory devices that are compliant with 09:58
15 Exhibit 1029 do have distinct pins for A0 through 09:58
16 A15. 09:58
17 Q. So the information listed in each row is 09:58
18 sent in parallel on each of the discrete pins; is 09:58
19 that correct? 09:58
20 A. In Table 10 the information -- no, I don't 09:58
21 believe that that's -- let's see. 09:58
22 Let's see. In a bank activate command -- 09:58
23 I'm not sure I understand the question. 09:58
24 Each command works a little bit 09:59
25 differently. And the information that's in Table 10 09:59

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would be triggered by the same clock edge would be a more precise way to say it. 09:59

Q. But the CS bar, RAS bar, CAS bar, and WE, you don't contend those are packetized signals, correct? 09:59

MR. CHANDLER: Objection. Form. 09:59

THE WITNESS: Again, it depends how you define "packetized." But -- 09:59

BY MS. ZHONG: 09:59

Q. What's your definition of "packetized"? 09:59

A. Well, I think it depends on context. 10:00

Q. Well, in the context of DRAMs or DIMMs, what's the definition of packetized? 10:00

A. I don't think it has a single definition for -- for the entire field of DRAMs or DIMMs. It's a word that can be useful in describing certain things. But we tend to use much more precise descriptions such as the timing diagrams that are provided in Exhibit 1029. 10:00

Q. When you say the Rambus memory modules you are familiar with were using packetized format for the control and address information, what did you mean? 10:00

A. There I'm referring to the way Rambus used that term in their commercially available 10:00

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1 information at the time, which was that they used a 10:01
2 single communication channel to provide bundles of 10:01
3 information that could include control, address or 10:01
4 data sharing the same channel at that time. 10:01
5 Q. And that differs from how JEDEC compliant, 10:01
6 for example, registered DIMM operates; is that 10:01
7 correct? 10:01
8 A. JEDEC compliant registered DIMMs such as 10:01
9 the ones in JESD21-C do not use the precise same 10:01
10 protocol as the commercial Rambus DIMMs that I'm 10:01
11 familiar with from earlier. 10:01
12 Q. What about SODIMMs? Do they use something 10:01
13 similar to what the Rambus does? Like JEDEC 10:01
14 compliant small-outline DIMMs, do they use protocol 10:02
15 similar to what Rambus uses? 10:02
16 A. There are many varieties of SODIMMs that 10:02
17 have been through the years. 10:02
18 Q. Are you aware of any small outlying DIMMs 10:02
19 that's JEDEC compliant and uses Rambus packetized 10:02
20 control and address information signaling protocol? 10:02
21 A. I don't know one way or the other. I'm 10:02
22 not aware of one off the top of my head. 10:02
23 Q. Okay. What about at the time of 10:02
24 invention, which is 2004 and 2005 time period? Are
25 you aware of any JEDEC compliant memory module that

uses Rambus packetized signaling scheme?

A. I don't know one way or the other. 10:03

Q. Can you think of any? 10:03

A. I just am not aware of whether or not -- 10:03

I'm aware of memory modules that used it. I just 10:03

don't know off the top of my head whether or not 10:03

there was a corresponding JEDEC standard at the 10:03

time. 10:03

Q. Which ones are you thinking of? 10:03

A. I don't remember them by name. But I can 10:03

go to a number of different memory model 10:03

manufacturers and get Rambus compliant memory 10:03

modules in the 2000 to 2005 time period. 10:03

Q. I'm not talking about Rambus compliant. 10:03

I'm talking about JEDEC compliant memory modules. 10:03

A. What I said is I don't know whether or not 10:03

there's a corresponding JEDEC standard off the top 10:03

of my head. 10:03

Q. For the JEDEC standards you relied upon, 10:04

are you aware of any modules that actually used 10:04

packetized signaling scheme that a Rambus used? 10:04

A. For the JEDEC standards that I relied on 10:04

as exhibits to my declaration, I'm not aware of any 10:04

of them using a Rambus compliant signaling protocol. 10:04

Q. Can you point me to an express disclosure 10:04

in Perego where it said that it's using JEDEC 10:04
signaling scheme on a module level? 10:04
A. I don't think I am aware of, right now, of 10:06
an express disclosure in Perego that one would use a 10:06
JEDEC compliant memory module by name. 10:06
There are simply a lot of disclosures in 10:06
Perego about the breadth of applicability and the 10:07
characteristics of the memory module that would lead 10:07
a person of ordinary skill to understand that a 10:07
JEDEC compliant memory module is compatible with the 10:07
invention described in Perego. 10:07
Q. Okay. Does a JEDEC compliant memory 10:07
module have configurable buffer width? 10:07
THE REPORTER: I'm sorry, configurable? 10:07
MS. ZHONG: Buffer, B-U-F-F-E-R, width, 10:07
W-I-D-T-H. 10:07
THE REPORTER: Thank you. 10:07
THE WITNESS: Not ordinarily. So one 10:07
would need then to incorporate that teaching from 10:07
Perego into the JEDEC module. 10:08
Also there are many teachings in Perego 10:08
that apply to a fixed width buffer as well as a 10:08
configurable one as well. So there's no requirement 10:08
to implement all the teachings of Perego that you 10:08
have the ability to configure the buffer width as 10:08

1 opposed to simply selecting one in advance. And if 10:08
2 you selected one in advance, then it would be much 10:08
3 closer to the existing JEDEC modules at the time. 10:08
4 BY MS. ZHONG: 10:08
5 Q. What's the bit width of JEDEC compliant 10:08
6 memory modules at the time? 564? 10:08
7 A. There were many different kinds that are 10:08
8 contemplated. JESD21 is exemplary, and it talks 10:08
9 about widths of 64 and 72. 10:09
10 But if you look at the underlying 10:09
11 standards for the chips, JESD79-2, for example, or 10:09
12 JESD79, they contemplate capability probably 10:09
13 everywhere from 4, 8, 16, 32, 64, or even more. 10:09
14 Q. Did you cite any JEDEC module standard 10:09
15 with x4, x8, x16 bit width? 10:09
16 A. I don't recall if I cited a specific 10:09
17 module standard. One would understand that from the 10:09
18 chip standards. 10:09
19 Q. I'm asking you are you aware of any JEDEC 10:09
20 standards at the time that specifies a x4, x6, x8, 10:10
21 x16 memory module width? 10:10
22 A. Yes, but I can't give you the specific 10:10
23 standard number off the top of my head. 10:10
24 Q. Are those for the DRAMs DIMMs? 10:10
25 A. They are for DRAM DIMMs. 10:10

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Q. And what was the width; do you recall? 10:10
A. Not specifically, but I do recall that 10:10
they were x8 DIMMs. 10:10
Q. And what kind of chip would they use? 10:10
A. A variety of different kinds of DRAM chips 10:10
depending on the date. 10:10
Q. So they can be x16 DRAM chips? 10:10
A. Not on a x8 module, no. A x8 module would 10:10
use x1, x4, or x8 chips. 10:10
Q. When was that extended; do you have any 10:11
recollection? 10:11
A. It was in the 1990s, but I don't recall 10:11
the exact dates. It may have been later. 10:11
Q. Okay. Are you aware of any JEDEC 10:11
standards in the early 2000s that use -- still use 10:11
x8, x16 memory module widths? 10:11
A. Well, as I said, those are contemplated in 10:11
JESD79-2. The physical dimensions of the module are 10:11
not described in the JESD79.2 but the functionality 10:11
is. 10:11
Q. I'm asking about the memory module 10:11
definition. 10:12
A. Well, there are many aspects to a memory 10:12
module definition. I -- I'm not aware one way or 10:12
the other whether or not there's a physical form 10:12

factor specification from JEDEC, but the 10:12
functionality is described in JESD79 and JESD79-2. 10:12
Q. Okay. For Exhibit 1032, which you say has 10:12
a bit width of x64 or x72, how many DRAMs would 10:12
there be in a rank if each DRAM is x4? 10:12
A. Depending on the implementation, typically 10:13
there would be either 16 or 18. But there can be 10:13
more. 10:13
Q. Okay. So how many DRAMs would there be 10:13
for a x64 memory module if the SDRAM used is x8? 10:13
A. Typically 8. 10:13
Q. And what about x16? So if you use a x16 10:13
SDRAM for a x64 DIMM, how many DRAM devices are 10:13
there in rank? 10:13
A. There would typically be 4 per rank. 10:13
Q. When is the concept of rank introduced in 10:14
JEDEC standards? 10:14
A. I'm sorry, I missed a word, the concept 10:14
of? 10:14
Q. When is a concept -- concept of rank 10:14
introduced in JEDEC standards? 10:14
MR. CHANDLER: Object to form. 10:14
THE WITNESS: I think the concept predates 10:14
JEDEC standards and is probably in some of the very 10:14
earliest ones. But there are issues of vocabulary. 10:14

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In the 1980s and 1990s the word "bank" -- 10:14
with a "B" -- was typically used for that concept. 10:14
And somewhere in the 2000 to 2010 time frame, 10:14
practitioners transitioned from using the word 10:14
"bank" most commonly to describe a set of one or 10:14
more chips that would respond to the same command or 10:15
chip select signal to using the word "rank." 10:15
The concept didn't change but the 10:15
vocabulary changed. And the reason for that is 10:15
because it became more common for individual memory 10:15
die to contain multiple banks on them. So there was 10:15
a motivation to distinguish the vocabulary, but 10:15
there was no new concept that was introduced at that 10:15
time. 10:15
BY MS. ZHONG: 10:15
Q. What do you mean by "it became more common 10:15
for individual memory dies to contain multiple banks 10:15
on them"? What are you referring to by the "banks" 10:15
there? 10:15
A. In the case of an individual memory die, 10:15
in the earlier days there would be one memory array 10:15
with rows and columns. And in the case of DRAM, an 10:15
entire row would be read to something that would 10:16
typically be called something like a page register. 10:16
As DRAM densities increased, in order to 10:16

maintain speed, manufacturers began to build two 10:16
relatively independent memory arrays on the same 10:16
semiconductor die, each of which could independently 10:16
have a row read out to one of two page registers. 10:16
And those were called banks because they had very 10:16
similar characteristics to the physical module banks 10:16
of memory that had been known in the art before. 10:16
And as memory densities increased, we 10:16
began to get chips with 4 and 8 banks on them. So 10:16
because there was a desire to distinguish the 10:17
vocabulary for that kind of a memory bank from the 10:17
earlier kind of a memory bank, memory providers 10:17
started to use the word "rank" to describe the one 10:17
or more chips on a module that would simultaneously 10:17
respond to a command. 10:17
Q. Perego also mentions a concept called 10:17
"channel." Do you recall that? 10:17
A. Yes. 10:17
Q. What is the term "channel" in the context 10:17
of Perego? 10:17
A. It's simply one or more wires that are 10:17
used to convey information. 10:17
Q. So in Perego Figure 4A, how many channels 10:18
are there? 10:18
MR. CHANDLER: Object to form. 10:18

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THE WITNESS: So you're referring to the 10:18
channels from the host computer to the module or the 10:18
channels from the buffer chip 405 to the various 10:19
memory devices. 10:19
BY MS. ZHONG: 10:19
Q. So in Figure 4A of Perego, it describes 10:19
channels 415a and 415b, correct? 10:19
A. I don't see those labeled on the drawing. 10:19
We can look to the text. 10:19
Q. You don't see them labeled on the drawing? 10:19
Like don't you see 415a on the lower left corner and 10:19
415b on the lower right corner of Figure 4A? 10:19
A. You're saying 415? 10:19
Q. Yes. 10:19
A. Oh. Yes, I do see 415a and 415b. 10:19
Q. Okay. So -- 10:20
A. The text -- 10:20
Q. -- with respect to -- 10:20
A. The text says that it's not necessary to 10:20
have two, that you could have one. But the 10:20
illustration shows two. 10:20
Q. Okay. So in this context, what is a 10:20
channel? 10:20
MR. CHANDLER: Objection. 10:20
THE WITNESS: In the context of 415a and 10:20

415b, it is the set of wires that is used to 10:20
communicate from one or more of the DRAM chips to 10:20
the buffer chip. 10:20
BY MS. ZHONG: 10:20
Q. How many ranks are there, Exhibit [sic] 10:20
4A? 10:20
THE REPORTER: I'm sorry. What was your 10:20
question? 10:20
THE WITNESS: A what? 10:20
BY MS. ZHONG: 10:20
Q. How many ranks of memory chips are there 10:20
in Figure 4A? 10:20
MR. CHANDLER: Objection. Form. 10:20
THE WITNESS: I believe that what's 10:21
illustrated is two ranks. But, again, the text 10:21
explains that one could have a different number. 10:21
BY MS. ZHONG: 10:21
Q. Why do you believe in Figure 4A there are 10:21
two ranks of memory devices? 10:21
A. Actually, let me think about that for 10:21
another minute. 10:21
I'm not sure that we're given enough 10:24
information about Figure 4A to make an exact 10:24
determination there. 10:24
Figure 4A is illustrating certain aspects. 10:24

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1 But if you read it in context, it can be used with a 10:24
2 lot of different kinds of memory modules. 10:24
3 I believe that in certain embodiments it's 10:24
4 certainly intended to represent two ranks, but there 10:24
5 could be some implementations or some embodiments in 10:24
6 which it's more. 10:25
7 Q. And in Figure 4B, how many channels are 10:25
8 there? 10:25
9 MR. CHANDLER: Object to form. 10:25
10 THE WITNESS: Well, there again, there are 10:25
11 lots of different kinds of channels. But there 10:25
12 are -- in Figure 4B there are four channels going 10:25
13 out to DRAM devices and a fifth channel going off to 10:25
14 the memory controller. 10:25
15 BY MS. ZHONG: 10:25
16 Q. Okay. And how many ranks are there in 10:25
17 Figure 4B? 10:25
18 A. Again, it depends which variety of memory 10:25
19 one were to implement. But I think that in at least 10:25
20 some of the embodiments that are described in the 10:25
21 specification, that would be a four-rank 10:25
22 implementation. 10:25
23 Q. In which embodiment described in Perego 10:25
24 would this be a four-rank implementation? 10:25
25 A. For example, if those were DDR memory 10:25

1 devices. 10:26
2 Q. So why would there be four-rank -- let me 10:26
3 reask. 10:26
4 Why would Figure 4B involve a four-rank 10:26
5 implementation if the devices are DDR memory 10:26
6 devices? 10:26
7 MR. CHANDLER: Objection. Form. 10:26
8 THE WITNESS: Well, because if we look at 10:26
9 it in context, you know, Figure 4C is probably the 10:26
10 better illustration, because -- 10:26
11 BY MS. ZHONG: 10:26
12 Q. Okay. 10:26
13 A. -- what it shows is something that might 10:26
14 be kind of specific to a DDR -- 10:26
15 Q. Okay. 10:26
16 A. -- to implementation. 10:26
17 And that is that there seems to be an 10:26
18 intention there that an entire channel would be 10:26
19 selected and respond to the same command at one time 10:27
20 whether it had one device or more than one device on 10:27
21 that channel. 10:27
22 Q. So if you only have a single channel, how 10:27
23 many ranks would there be if the memory devices are 10:27
24 DDR basic devices? 10:27
25 A. Again, there are a variety of embodiments 10:27

that are described. But my understanding would be 10:27
that if there was only a single channel, then -- you 10:27
could put more than one rank on a channel, but I 10:27
think what's basically described would be probably, 10:27
in the simplest implementation, would be one rank 10:27
per channel. 10:28
Q. Okay. So in a one-rank-per-channel 10:28
implementation, there is only one physical rank, 10:28
correct, for a single channel? 10:28
A. If you have -- 10:28
MR. CHANDLER: Objection. Form. 10:28
THE WITNESS: If you have one channel and 10:28
one rank per channel, then you would only have one 10:28
physical rank. 10:28
BY MS. ZHONG: 10:28
Q. Okay. So in that implementation, there 10:28
would be -- the concept of rank multiplication would 10:28
not apply; is that right? 10:28
MR. CHANDLER: Objection. Form. 10:28
THE WITNESS: You'd have to look at the 10:28
entirety of the memory system, but that's certainly 10:28
not the intent of rank multiplication. I think the 10:28
intent of rank multiplication is to make a larger 10:28
number of ranks appear to be a smaller number of 10:28
ranks. 10:29

BY MS. ZHONG: 10:29
Q. So if there's only a single physical rank, 10:29
then the concept of rank multiplication would not 10:29
apply? 10:29
A. If your entire system only has one 10:29
physical rank, then you are not practicing rank 10:29
multiplication. 10:29
Q. And you say like in Perego, the intention 10:29
is one rank per channel in general, correct, at 10:29
least for DDR compliant language? 10:29
So in Perego, the intention is one rank 10:29
per channel for JEDEC compliant DDR devices; is that 10:29
correct? 10:29
MR. CHANDLER: Objection. Form. 10:29
THE WITNESS: I think that's the simplest 10:29
implementation that a person of ordinary skill would 10:29
understand under those particular circumstances. 10:29
BY MS. ZHONG: 10:30
Q. Anywhere in your declaration that you 10:30
describe multiple ranks per channel for Perego's 10:30
implementation? 10:30
A. I don't recall. 10:30
Q. You can't find any right now, correct? 10:30
A. Not at the moment. 10:30
Q. Can you please turn to column 14 of 10:31

Perego. 10:31

THE REPORTER: Counsel, excuse me, what 10:31

exhibit number is that? 10:31

MS. ZHONG: Exhibit 1035. 10:31

THE REPORTER: Thank you. 10:31

BY MS. ZHONG: 10:31

Q. Can you please take a look at the example 10:31

described in column 14, lines 41 to 43. 10:31

A. Okay. 10:32

Q. So in column 14, lines 41 to 43, in that 10:32

example, the memory device access width is 128 bits, 10:32

correct? 10:32

A. In that particular example, that is the 10:32

case, yes. 10:32

Q. And what does that mean, the memory access 10:32

width is 128 bits? 10:32

A. I believe that it means that the 10:33

collection of memory devices in that particular 10:33

embodiment produced data 128 bits at a time. 10:33

Q. Okay. Let me see what I can understand. 10:33

You believe that means for a single read 10:33

or write operation, 128 bits will be transferred 10:33

from the memory devices on the module; is that 10:33

correct? 10:33

MR. CHANDLER: Objection. Form. 10:33

THE WITNESS: Can I hear the exact 10:33
question again? 10:33
BY MS. ZHONG: 10:33
Q. Is it correct that a memory device access 10:34
width of 128 bits means that in a single read or 10:34
write operation, 128 bits of data will be 10:34
transferred from the memory devices on the module? 10:34
MR. CHANDLER: Objection. Form. 10:34
THE WITNESS: It means that the memory 10:34
devices on the module will output 128 bits or input 10:34
128 bits for a single read or write operation. 10:34
BY MS. ZHONG: 10:35
Q. Okay. But the configurable width buffer 10:35
device interface width is only 16 bits in this 10:35
particular example, correct? 10:35
A. In this particular example, that is 10:35
correct. 10:35
Q. And that means there are only 16 pins to 10:35
transfer data at a time; is that correct? 10:35
A. In this particular example, yes, that only 10:35
16 pins are used. 10:35
Q. So how can you transfer 128 bits in a 10:35
single read and write operation if there are only 10:35
16 pins? 10:35
A. That operation would have eight phases in 10:35

that particular situation. You would transfer the 10:35
first 16 bits, then the next 16 bits, then the next 10:35
16 bits, then the next 16 bits. That's a very 10:35
common technique in digital electronics. 10:35
Q. Okay. So what you mean is that the 10:36
128 bits will be transferred in eight cycles from 10:36
the 16 pins? 10:36
MR. CHANDLER: Objection. Form. 10:36
THE WITNESS: It depends how you define a 10:36
cycle. Usually at this point in time, we would be 10:36
talking about double data rate. 10:36
So we would have two pieces of information 10:36
per cycle, but each transfer would be 16 bits. And 10:36
there would be 8 transfers on the memory controller 10:36
to module bus. And those 8 transfers would transfer 10:36
in total 128 bits. 10:36
BY MS. ZHONG: 10:36
Q. So regardless of the buffer width -- 10:36
THE REPORTER: I'm sorry, Counsel, one 10:36
more time. I lost a word in there. 10:36
BY MS. ZHONG: 10:36
Q. So regardless of the width of the 10:36
configurable buffer, 128 bits will be transferred 10:37
for each read and write operation; is that correct? 10:37
MR. CHANDLER: Object to form. 10:37

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THE WITNESS: No. Maybe I'm not sure what 10:37
you're asking. 10:37
The 128 bits is a characteristic of this 10:37
particular example. And in this particular example, 10:37
the configurable width buffer device interface width 10:37
is 16 bits. So I don't know what it means to 10:37
disregard that portion of the example. 10:37
BY MS. ZHONG: 10:37
Q. So if we keep the memory device access 10:37
width constant and change the configurable buffer 10:37
width, all that changes is the number of transfers 10:37
that are needed to transfer out the 128 bits; is 10:37
that correct? 10:37
A. There are other things that change. But 10:38
the primary thing that would change would be the 10:38
number of transfers required, and that's what's 10:38
referred to as the serialization ratio. 10:38
Q. Can you also turn to column 15? There is 10:38
a reference to another serialization ratio in 10:38
column 15, if you can take a look at that. 10:38
A. I'm not sure which one you're talking 10:38
about. You're talking about around line 6, 7? 10:38
Q. Starting from lines 6 to line 30. 10:38
A. Okay. 10:39
Q. How is serialization ratio different from 10:39

the serialization ratio that's described in 10:39
column 14? 10:39
A. I don't believe it is. I think it's 10:39
simply another description of the same concept. 10:39
Q. Okay. So the primary link -- 10:39
A. Let me -- let me correct that. Let me 10:40
correct that. 10:40
Q. Okay. 10:40
A. The description in 15 takes into account 10:40
the possibility that these channels could be running 10:40
at different speeds. So, therefore, in the example 10:40
that we talked about before, we would take 128 bits 10:40
and break it into eight 16-bit portions. 10:40
That's happening here as well, but what 10:40
it's saying is if you want to have matched 10:40
bandwidth, which means if you want to have the same 10:40
capacity over time for each channel, that the 10:40
channel that communicates in eight steps should be 10:40
eight times as fast so that it can communicate 10:41
128 bits in the same amount of time. 10:41
Q. So when you say "channel," which channel 10:41
are you referring to? 10:41
A. The narrower -- in that particular 10:41
statement, I was referring to the narrower channel. 10:41
In other words, if we want each of the 10:41

1 channels -- and this is particularly the 10:41
2 channel 370, which is the channel between the memory 10:41
3 device and the buffer device and the -- what's 10:41
4 called here the primary channel, which is the 10:41
5 channel between the buffer device and the host 10:41
6 computer. 10:41
7 What this is saying is if they have 10:41
8 different widths and yet we still want them to have 10:41
9 the same capacity, then if we make the width of the 10:41
10 narrow channel N times narrower, it must also be N 10:41
11 times faster in order to have the same capacity over 10:41
12 time. 10:42
13 Q. So you are saying that if the secondary 10:42
14 channel can output 128 bits and the primary channel 10:42
15 is only 16 bits wide, then that primary channel 10:42
16 needs to be eight times faster than the secondary 10:42
17 channel; is that right? 10:42
18 A. If you want to also have the requirement, 10:42
19 which is optional, that they have equivalent 10:42
20 bandwidth. 10:42
21 Q. Okay. What is the meaning of the memory 10:42
22 module bit width? 10:43
23 A. What is the meaning of the memory module 10:43
24 bit width? 10:43
25 Q. Uh-huh. 10:43

A. Again, it would depend on the context. 10:43
But normally that term is used to describe the 10:43
number of bits that are communicated in a single 10:43
read or write operation between the memory module 10:43
and the host computer. 10:43
Q. So in the example that we discussed in 10:43
column 14, lines 40 to 43, what is the bit width of 10:43
the memory module then? 10:43
A. Again, I don't think there's a standard 10:43
definition. But I think that most engineers would 10:43
probably describe that as a 128-bit-wide memory 10:43
module because that's the size of the transfers. 10:44
But there could be variation in how that vocabulary 10:44
is used. 10:44
Q. Okay. What is the difference between 10:44
control and control address information versus 10:44
control signal and address signal? 10:44
A. Again, that would depend on the context. 10:44
Typically, the signal would be something physical, 10:44
but not always. And information would be the 10:44
knowledge contained in that signal. But depending 10:44
on context, they can be used in different ways or 10:44
interchangeably. 10:44
Q. Okay. So, for example, when you packetize 10:44
the control and address signal in a multiplex with 10:45

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1 data, then it doesn't really contain a physical 10:45
2 manifestation of a control signal as you would, for 10:45
3 example, in a registered DIMM shown in Exhibit 1032; 10:45
4 is that right? 10:45
5 A. I don't think I agree. There's still a 10:45
6 physical manifestation. In both cases there's a 10:45
7 period of time that's important, and the voltages on 10:45
8 a wire are going to vary during that period of time 10:45
9 to convey information. 10:45
10 Q. But in the packetized form, the 10:45
11 information is serialized, and you have to decode it 10:46
12 in order to extract that information; isn't that 10:46
13 right. 10:46
14 A. You don't necessarily need to decode it. 10:46
15 What you have to do is implement it at the proper 10:46
16 time. But you always need to implement a memory 10:46
17 communication signal at the proper time. 10:46
18 The real difference is whether or not 10:46
19 you're using the same wires to convey address and 10:46
20 data signals or whether you're using two sets of 10:46
21 wires to convey address and data signals. 10:46
22 In either case, there are multiple signals 10:46
23 being multiplexed on there for multiple 10:46
24 transactions, for example. So everything has got to 10:46
25 be measured and effectuated at the appropriate time. 10:46

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Q. What do you mean by "the real difference 10:47
is whether or not you are using the same wires to 10:47
convey address and data signals or whether you're 10:47
using two sets of wires to convey address and data 10:47
signals"? 10:47
A. The difference between the system that 10:47
Rambus described as packetized in their commercial 10:47
products and the more commonly used SDRAM DIMMs that 10:47
were not Rambus compliant was that Rambus would use 10:47
the same wires for address control and data, while 10:47
non-Rambus-compliant DIMMs would generally use 10:47
distinct wires for data. 10:47
Q. And the non-Rambus JEDEC compliant DIMMs 10:48
would also have dedicated pads or pins for chip 10:48
select signals; is that right? 10:48
A. Dedicated? Let me take a quick look. 10:48
Q. You can take a look at Exhibit 1032. 10:48
A. That's certainly the case for Exhibit 1032 10:48
is there were dedicated chip select signals on that 10:48
particular DIMM. 10:48
Q. Is it necessarily the case that the 10:48
signals sent to the SDRAM are the same as the 10:48
signals that's received from the computer system? 10:49
A. I don't understand that question. 10:49
Q. So according to JEDEC Standard 79-2, 10:49

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1 certain signals have to be sent to the SDRAM, for 10:49
2 example, band address signals, chip select signals, 10:49
3 CAS bar, RAS bar, and right enable bar, correct? 10:49
4 A. Are you asking do they need to be sent to 10:49
5 the SDRAM module or to the SDRAM device? 10:49
6 Q. To the SDRAM device. 10:49
7 A. They would ordinarily be used to control 10:49
8 the SDRAM device. It's up to the module designer 10:50
9 whether or not to send them directly or whether or 10:50
10 not they can be passed through some logic function 10:50
11 first. 10:50
12 Q. Okay. But do the exact same signals have 10:50
13 to be received on the DIMM, or can they be received 10:50
14 in an encoded form and then decoded to send those 10:50
15 signals out to the SDRAM? 10:50
16 MR. CHANDLER: Objection. Form. 10:50
17 THE WITNESS: I'm not sure what you're 10:50
18 asking. The symbols that are shown -- the signals 10:50
19 that are shown on page 7 of Exhibit 1032 are signals 10:50
20 at the connector of the DIMM as specified. 10:50
21 BY MS. ZHONG: 10:50
22 Q. But you said there are many different 10:50
23 DIMMs, right, and the signaling scheme does not have 10:50
24 to be the same, as shown in this JEDEC 10:51
25 specification; is that correct? 10:51

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A. Sure. Not every DIMM has the same signals 10:51
as JESD21-C. 10:51
Q. Okay. So, for example, the information 10:51
can be received in a packetized form and then 10:51
demultiplexed or decoded to extract the signals; is 10:51
that correct? 10:51
MR. CHANDLER: Objection. Form. 10:51
THE WITNESS: I'm not sure what we're 10:51
talking about. This is on some hypothetical DIMM? 10:51
BY MS. ZHONG: 10:51
Q. Can that be done? 10:51
A. Sure, conceivably one could do that. 10:51
Q. And, for example, Perego's DIMM uses -- at 10:51
least in some of the embodiments, they use 10:52
packetized format to convey the control and address 10:52
information, correct? 10:52
A. In some embodiments. But Perego 10:52
contemplates a wide variety of -- of embodiments and 10:52
he talks about things well beyond just 10:52
point-to-point links. 10:52
Q. And in those preferred embodiments that 10:52
you relied on, those are point-to-point links; is 10:52
that right? 10:52
MR. CHANDLER: Objection. Form. 10:52
THE WITNESS: No. They're described as 10:52

1 something that could be implemented as a 10:52
2 point-to-point link, but there's also a discussion 10:52
3 of other kinds of links as well. 10:52
4 MR. CHANDLER: We have been going about 10:52
5 two hours. Whenever you are at a good breaking 10:53
6 point, it might be a nice time for a break. 10:53
7 MS. ZHONG: Sure. 10:53
8 Q. Why don't we take a look at your 10:53
9 declaration, Exhibit 1003, page 77, paragraph 133. 10:53
10 Are you there? 10:53
11 A. Yes. 10:53
12 Q. So for the specific citation that you 10:53
13 quoted here, which I believe we discussed earlier, 10:53
14 that is a distinct signaling scheme from the JEDEC 10:54
15 compliant signaling scheme; is that correct? 10:54
16 MR. CHANDLER: Objection. Form. 10:54
17 THE WITNESS: As I said, I'm not familiar 10:54
18 off the top of my head with every JEDEC standard. 10:54
19 But the particular example that's quoted in 10:54
20 paragraph 133 that's from column 13, line 54, is 10:54
21 describing something that's distinct from JESD21-C. 10:54
22 BY MS. ZHONG: 10:54
23 Q. So what's described -- what you quoted in 10:54
24 paragraph 133 is a different signaling scheme than 10:54
25 that is used for the RDIMM described in 10:54

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Exhibit 1032; is that correct? 10:55
A. It is not an identical signaling 10:55
mechanism, but it does have teachings that are 10:55
applicable to the signaling mechanism used for DDR2. 10:55
Q. Okay. So, for example, it does not have 10:55
the CS signal, the CAS, RAS -- let's go to page 16 10:55
of Exhibit 1032. 10:55
A. Uh-huh. 10:55
Q. For example, the signaling scheme 10:55
described in 133 would not have the signals that's 10:55
listed on the left-hand side of the register box; is 10:55
that correct? 10:56
A. I think it would have those signals. It 10:56
just wouldn't necessarily have them in the exact 10:56
same physical form. It would have them in a way 10:56
that has a different physical implementation. But 10:56
certainly a person of ordinary skill in the art 10:56
would understand how the teachings apply to both. 10:56
Q. Okay. So they will be a different 10:56
physical implementation that's different than what's 10:56
described on Exhibit 1032, page 16; is that right? 10:56
A. That's true with respect to that one 10:56
particular statement. If you look at the teaching 10:56
as a whole, it's broad enough to encompass what's in 10:56
1032. 10:56

MS. ZHONG: We can take a break. How long do you want it to be? 10:56

Why don't we get off the record and then we can discuss how long the breaks needs to be. 10:57

MR. CHANDLER: Okay. 10:57

(Recess.) 11:08

(Off record: 10:57 a.m.) 11:08

(On record: 11:16 a.m.) 11:08

MS. ZHONG: We can go back on the record. 11:16

Q. Dr. Wolfe, can you go back to your declaration, Exhibit 1003, page 93? 11:17

A. Okay. 11:17

Q. Do you see Table 10, the command truth table? 11:17

A. Yes. 11:17

Q. Is the content in that command truth table something that had a person of ordinary skill in the art would be familiar with at the time of the '912 inventions? 11:17

A. Yes. 11:18

Q. So, for example, they would know, for a DDR SDRAM, a write operation would include bank address information; is that correct? 11:18

A. Yes, for things that are compliant within JEDEC Standard 79-2. 11:18

Q. So they would know that in order for the 11:18
SDRAM to perform a write operation the DIMM has to 11:18
receive the bank address signals, correct? 11:18
A. Was the question that the DIMM has to 11:18
receive the bank address signals? 11:18
Q. Correct. 11:18
A. That's from JESD79-2, which does not 11:19
require a DIMM. But if that particular chip were on 11:19
a DIMM, then the DIMM would need to receive the bank 11:19
address signals. 11:19
Q. Okay. And so if a DDR or DDR2 device is 11:19
on the DIMM, does that DIMM have to receive a bank 11:19
address signal in order to perform a read operation? 11:19
A. If you're using a JEDEC Standard 79-2 11:19
memory on a DIMM, then that DIMM would need a bank 11:19
address signal. 11:19
Q. Are you aware of DRAMs that do not use 11:19
bank address signals for read or write operation? 11:19
A. Yes. 11:20
Q. Which kind of DRAMs do not use bank 11:20
address signals for read and write operation? 11:20
A. I'd have to go back and look at the 11:20
specific specifications. But, based on my 11:20
recollection, perhaps the Burst EDO DRAMs may not 11:20
have used them, or it may be a previous generation. 11:20

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Q. Okay. What about DDR2, DDR SDRAMs? Are you aware of any such memory devices that do not use bank address signals for read or write operation? 11:20

A. If by DDR and DDR2 you mean things that are compliant with JESD79 or JESD79-2, in that case I'm not aware of any that don't use a bank address signal at the memory chip device itself. It doesn't necessarily have to be provided to anything else on the DIMM. 11:20 11:20 11:20 11:20 11:20 11:21 11:21 11:21

Q. So how can the bank address signals be provided to the SDRAM if the signal is not sent to the DIMM on which the SDRAM is sent on? 11:21 11:21 11:21

A. There are lots of different ways. You could do a design. You could generate them on the DIMM hypothetically, depending on what you were using the DIMM for and what you were trying to accomplish. 11:21 11:21 11:21 11:21 11:21 11:21 11:21

Q. Okay. So according to you, it is not necessary for DIMM to receive, for example, bank address signals, RAS, CAS -- let me withdraw and ask. 11:21 11:22 11:22 11:22

Is -- would it also be the case that for a read and write operation that's to be performed by a DDR, a DDR2 SDRAM, it is not necessary for the DIMM on which the SDRAM is set on to receive a chip 11:22 11:22 11:22 11:22

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select signal? 11:22
A. It would not be necessary, but it would be 11:22
ordinary for the DIMM to receive a chip select 11:22
signal. 11:22
Q. And would it be ordinary for the DIMM to 11:23
receive a bank address signal for a read and write 11:23
operation? 11:23
A. If it were a memory DIMM that used memory 11:23
chips compliant with JESD79 or JESD79-2, it would be 11:23
ordinarily for that DIMM to be provided with a bank 11:23
address signal. That bank address signal, in the 11:23
simplest case, would go directly to the memory 11:23
devices. 11:23
Q. What if it is a registered DIMM? Would 11:23
that bank address signal go to the register on the 11:23
DIMM side then? 11:23
A. Again, we'd have to look at the particular 11:23
standards. But in the case of, for example, the 11:23
JESD21-C registered DIMMs, bank address signals 11:23
would go to a register typically. 11:24
Q. Were DDR2 or DDR SDRAMs common at the time 11:24
of the '912 invention? 11:24
A. By "common" do you mean generally 11:24
available? 11:24
Q. When someone says a DRAM device in 2004 11:24

and 2005, would the person of ordinary skill in the 11:24
art that DDR2 -- (indiscernible.) 11:24
THE REPORTER: I'm sorry. Excuse me, 11:25
Counsel. I lost you on that one. Repeat your 11:25
question, please. 11:25
BY MS. ZHONG: 11:25
Q. So in 2004 and 2005, when a person with 11:25
ordinary skill in the art mentions a DRAM device, 11:25
would others understand that the DRAM device they 11:25
refer to would include DDR2 or DDR device? 11:25
A. I think they would understand that it 11:25
could include a DDR or DDR2 device, especially if 11:25
they were in the context of a general purpose 11:25
computer. 11:26
Q. Okay. And if the person -- the 11:26
description for that DRAM device also include things 11:26
such as chip select signals, would that also be 11:26
consistent with the reference to a DDR or DDR2 11:26
device? 11:26
A. If I understand your question correctly, 11:26
the use of chip select signals on a DDR or DDR2 11:26
memory device is ordinary. 11:26
Q. What do you mean by "ordinary"? 11:26
A. For the most commonly available devices 11:27
would -- that are DDR or DDR2 in the 2004, 2005, 11:27

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2006 time frame -- would be compliant with JESD79 or 11:27
JESD79-2 and would include a chip select input. 11:27
Q. So if a DRAM device is described as 11:27
including a chip select signal, would that indicate 11:27
to a person of ordinary skill in the art that device 11:27
is likely a DDR2 or DDR device? 11:27
A. No, that would generally not be a 11:28
identifying or distinguishing characteristic. 11:28
Q. And you said that if the DRAM device was 11:28
used in connection with a personal computer, then a 11:28
person of ordinary skill in the art would understand 11:28
that a DRAM device could be a DDR2 or DDR device, 11:28
correct? 11:28
A. That would be true in the 2000 to 2006 11:28
time frame. 11:28
Q. Okay. And then they would understand that 11:28
if those are DDR and DDR2 device, in order for the 11:29
DDR -- in order for the memory device to perform a 11:29
read, write, bank activation operation, it would be 11:29
ordinary for the computer system to send signals 11:29
such as bank address signals, chip select signals, 11:29
CAS bar, RAS bar, and write enable bar; is that 11:29
correct? 11:29
A. It would be ordinary to send those to an 11:29
ordinary personal computer in DDR or DDR2 module at 11:29

that time. 11:30

Q. What do you mean by "It would be ordinary 11:30

to send those to an ordinary personal computer in 11:30

DDR or DDR2 module"? 11:30

A. One could -- one can use these chips in 11:30

many different ways and build many different kinds 11:30

of memory modules. But there were typical memory 11:30

modules at the time that were JEDEC compliant with 11:30

various JEDEC standards. 11:30

Q. Are you saying those CAS bar, RAS bar, WE, 11:30

and chip select and bank address signals are sent to 11:30

the personal computer instead of being sent from the 11:30

personal computer to the memory modules? 11:30

MR. CHANDLER: Vague. 11:31

THE WITNESS: No. 11:31

BY MS. ZHONG: 11:31

Q. Hello? 11:31

A. Yes. I answered, "no." 11:31

Q. You are saying that it would be ordinary 11:31

for a personal computer to send CAS bar, RAS bar, WE 11:31

bar, chip select signals and bank address signals to 11:31

the memory module for a read and write operation at 11:31

the time of the invention; is that correct? 11:31

A. Yes, I think that's fair. And then one 11:31

would have to look at how those are then connected 11:32

on the memory module to figure out whether or not 11:32
that's at all relevant to these claims. 11:32
Q. Is that something a person of ordinary 11:32
skill in the art would understand? 11:32
A. Yes. 11:32
Q. Can you pull up Exhibit 1034. 11:33
(Exhibit 1034 was marked for 11:33
identification and attached 11:33
hereto.) 11:33
THE WITNESS: Okay. 11:33
BY MS. ZHONG: 11:33
Q. Can you please go to page 2 of 11:33
Exhibit 1034. 11:33
A. Okay. 11:33
Q. The last paragraph on the right hand, 11:33
"disables the chip select bus." Do you see that? 11:33
A. Yes. 11:33
Q. So according to this paper, the chip 11:33
select bus is essential in the JEDEC-style memory 11:34
system. Do you agree with that? 11:34
A. In the context that's being used in this 11:34
paper where it's talking about DIMMs in a 11:34
traditional computer, I do think that the chip 11:34
select bus is essential in as far as it needs to 11:34
exist. 11:34

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Q. In the Rambus memory module that you are 11:34
familiar with, there isn't a chip select bus; is 11:34
that correct? 11:34
A. There is not a distinct chip select bus. 11:34
It's subsumed into the -- into the Rambus channel. 11:34
Q. And what's your understanding of the chip 11:35
select bus in the context of Exhibit 1034? 11:35
A. I think that it's simply saying that in a 11:35
conventional PC-type memory system as of 2002 -- and 11:35
by "conventional," that's not the Rambus type -- 11:35
that there is a chip select signal provided for 11:35
every rank of memory in order to control the timing 11:35
of that rank with respect to responding to commands. 11:35
Q. So what's the difference between a bus 11:35
versus the point-to-point architecture described in 11:36
Perego? 11:36
A. A bus can be used broadly here. I think 11:36
in this particular reference, I think "bus" simply 11:36
is being used to refer to a collection of wires. 11:36
The -- again, and Perego does disclose 11:36
buses as alternatives to point-to-point. It 11:36
discloses both kinds of embodiments numerous times. 11:36
But in his point-to-point description in 11:36
Perego, he talks about things that have one 11:36
transceiver on each end, where in Perego buses used 11:36

a thing -- described things that can have more than 11:36
one transceiver. 11:36
I'm not sure that it's being used in 11:36
exactly the same way here. It's quite possible 11:36
that -- that this particular chip select bus the way 11:36
it would normally be implemented would be 11:36
point-to-point. 11:37
And it's also common to use the term "bus" 11:37
to simply refer to a collection of wires. And I 11:37
believe that's what's being done in 1034 in the area 11:37
that we referred to. 11:37
Q. Okay. So in the 2004 and 2005 time 11:37
period, a conventional PC system would send chip 11:37
select signals, CAS bar, RAS bar, write enable bar, 11:37
clock, bank address signals to a DIMM; is that 11:37
correct? 11:37
A. I don't know if it would send all of 11:37
those. 11:37
Q. Which signals you don't think it would 11:37
send? 11:38
A. I don't think it's just a clock at that 11:38
time frame. I think it tends to be a little more 11:38
complicated, and there are a number of -- 11:38
Q. Okay. 11:38
A. -- timing signals that are sent. 11:38

Q. So in the 2005 and 2005 {sic} time period, 11:38
a conventional PC system would send chip select 11:38
signals, CAS bar, RAS bar, write enable bar, bank 11:38
address signals to a DIMM for a read and write 11:38
operation; is that correct? 11:38
A. That would be typical. And, again, then 11:38
it would depend on the implementation as to what the 11:38
DIMM did with those signals. 11:38
Q. Would those same signals be sent to a DIMM 11:38
by a conventional PC for bank activation -- row 11:38
activation operation in the 2004 and 2005 time 11:38
period? 11:39
A. They wouldn't all be used for row -- for 11:39
row activation, but they would be physically 11:39
present. 11:39
Q. Okay. And for bank activation, would 11:39
those -- would those same signals be sent from a 11:39
conventional PC system to a memory module in the 11:39
2004 and 2005 time period? 11:39
A. Again, I don't know what you mean by 11:39
signals being sent. They would be physically 11:39
connected, but they could be -- some of those 11:39
signals could be dormant in a bank -- in a bank 11:39
activation. 11:39
Q. What do you mean by some of the signals 11:39

1 would be dormant? 11:39
2 A. They may not be doing anything. There may 11:39
3 not be any information being provided on some of 11:39
4 those signals during a bank activate. 11:39
5 Q. Okay. But those signals would be sent and 11:40
6 received, just that they would not be used. Is that 11:40
7 what you mean? 11:40
8 A. From the perspective of the DIMM, I think 11:40
9 that is -- that's -- that would be common. 11:40
10 Q. Okay. So it would be common in 2004 and 11:40
11 2005 time period for a memory module to receive chip 11:40
12 select signals, bank address signals, CAS bar, RAS 11:40
13 bar, write enable bar for memory operation such as 11:40
14 read, write, and bank activation; is that correct? 11:40
15 A. Yes, from the perspective of the DIMM 11:40
16 itself they would be received. 11:40
17 Q. Can you pull up Exhibit 1035 Perego, 11:41
18 column 15, lines 37 to 40. 11:41
19 Are you there, Dr. Wolfe? 11:41
20 A. Give me the line numbers again. 11:41
21 Q. 37 to 40. 11:41
22 A. Okay. 11:42
23 Q. So according to the description there, 11:42
24 "According to a preferred embodiment, the target 11:42
25 subset of secondary channel signal lines may be 11:42

1 selected via address bits provided as part of the 11:42
2 primary channel request." 11:42
3 Do you see that, Dr. Wolfe? 11:42
4 THE REPORTER: I'm sorry, Counsel. I'm 11:42
5 sorry, Counsel. Could you repeat that and read it 11:42
6 slowly. 11:42
7 BY MS. ZHONG: 11:42
8 Q. According to the description here, being a 11:42
9 preferred embodiment, "the target subset of 11:42
10 secondary channel signal lines may be select via 11:42
11 address bits provided as part of the primary channel 11:42
12 request." 11:42
13 Do you see that, Dr. Wolfe? 11:42
14 A. I do. 11:42
15 Q. Are address bits the same as chip select 11:42
16 signals? 11:42
17 MR. CHANDLER: Objection. Form. 11:42
18 And I didn't hear the question either. 11:42
19 BY MS. ZHONG: 11:42
20 Q. Are address bits the same as chip select 11:42
21 signals? 11:42
22 A. It depends on the context. 11:43
23 MR. CHANDLER: Court Reporter, I said 11:43
24 address bits, B-I-T-S. 11:43
25 THE REPORTER: I'm sorry, spell that 11:43

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again. 11:43
MS. ZHONG: Bits, B-I-T-S. 11:43
THE REPORTER: Thank you. 11:43
BY MS. ZHONG: 11:43
Q. When you say "It depends on the context," 11:43
when are address bits the same as chip select 11:43
signals? 11:43
A. One can define -- one can design a memory 11:43
system where an address bit is used as a chip select 11:43
signal. 11:43
Q. But that would not be JEDEC compliant; is 11:43
that correct? 11:43
MR. CHANDLER: Object to form. 11:43
THE WITNESS: It depends. It could be 11:43
compliant with certain JEDEC specifications 11:43
depending on how it was done. 11:43
BY MS. ZHONG: 11:43
Q. Would it be compliant with the JEDEC 11:43
specifications that you relied on? 11:44
A. Yes, it could be compliant, for example, 11:44
with Exhibit 1029. Again, it depends what you're 11:44
trying to build and what the context is. 11:44
Q. How would it be compliant with 11:44
Exhibit 1029? 11:44
A. Well, because Exhibit 1029 describes the 11:44

1 functionality of the chip select signal. It doesn't 11:44
2 tell you what to connect it to or what you must 11:44
3 connect it to. 11:44
4 Q. So you disagree with Exhibit 1034 comment 11:44
5 that JEDEC -- JEDEC-style memory system has to have 11:44
6 a dedicated chip select bus? 11:44
7 A. No, I don't disagree with them. A 11:45
8 JEDEC-style memory system is more than -- in this 11:45
9 context, is more than just something that uses a 11:45
10 JEDEC compliant chip. 11:45
11 I think if you read this in context, it's 11:45
12 talking about using a JEDEC compliant DIMM as is 11:45
13 described in the previous paragraph. 11:45
14 Q. And in this description, column 15, lines 11:45
15 37 to 40, are the address bits used to define a 11:45
16 rank? 11:46
17 A. In this particular embodiment, which I 11:46
18 believe is not the one that I relied on in my 11:46
19 declaration, the address bit can be one of the 11:46
20 factors that's used in selecting a rank. 11:46
21 Q. Can you go to paragraph 96 -- page 96 to 11:46
22 97 and take a look at your paragraph 155? 11:46
23 What paragraph are you relying on? Which 11:47
24 passage from Perego are you relying on? 11:47
25 A. That is column 15, 31 through 45. 11:47

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Q. And that includes the passage we just 11:47
discussed, correct? 11:47
A. It does. 11:47
Q. Okay. So are you relying on the 11:47
embodiment that we just discussed in your 11:47
declaration? 11:47
A. For that particular teaching, yes. 11:47
Q. And in this particular teaching, the -- 11:47
according to you, the rank is selected using address 11:47
bits and not a specific chip select signal, correct? 11:47
A. No, no. The address bits in this 11:47
particular case would be one of the factors to 11:48
decide which rank to select. It would not be the 11:48
only factor. 11:48
Q. And 155 you state, "Both Perego and Amidi 11:48
teach using the address signals to select the target 11:48
rank," correct? 11:48
A. Correct, but not exclusively. 11:48
Q. Did you say Perego and Amidi teach using 11:48
the address signals in part to select the target 11:48
rank? 11:48
A. No, I didn't say that. I just said that 11:48
they use them, and they do use them. It doesn't say 11:48
that they don't use other signals as well. 11:48
Q. And in this paragraph or elsewhere did you 11:48

1 discuss what other information is used to select the 11:48
2 target rank other than the address signals for this 11:49
3 embodiment? 11:49
4 A. Well, this is part of a very extensive 11:49
5 discussion. Let me see if I can find a better 11:49
6 answer. 11:49
7 Q. Let's just discuss this preferred 11:50
8 embodiment in particular. What other information in 11:50
9 this preferred embodiment is used to select a target 11:50
10 rank other than the address bits? 11:50
11 A. I think a person of ordinary skill would 11:51
12 understand that the chip select is also used in this 11:51
13 particular situation. 11:51
14 Q. And where does the word "chip select 11:51
15 signal" appear in Perego? 11:51
16 A. In one place their individual device. Let 11:51
17 me see. 11:51
18 I don't think there's an explicit 11:52
19 description of a chip select line. I think a person 11:52
20 of ordinary skill would have to use their knowledge 11:53
21 of the computer system to incorporate that. 11:53
22 If you look, for example, at the general 11:53
23 disclosures that say that you can have multiple 11:53
24 modules on a bus, clearly there would have to be 11:53
25 some indication of which module was being selected. 11:53

1 And, in particular, if, as I've suggested, you would 11:53
2 implement it with JEDEC compliant technology, then 11:53
3 you would incorporate that feature from the JEDEC 11:53
4 specifications. 11:53
5 Q. You were talking about selecting different 11:53
6 modules. Is module the same as a rank? 11:53
7 A. It's not. But you wouldn't select a rank 11:54
8 on a module unless the module itself was being 11:54
9 selected. 11:54
10 Q. Okay. So you -- the PC will first select 11:54
11 which module to communicate with -- 11:54
12 A. There's no -- 11:54
13 Q. -- and the chip select signal -- go ahead. 11:54
14 A. I mean, there's no sequence there. Only a 11:54
15 single rank is going to be selected to respond from 11:54
16 the PC's perspective. 11:54
17 Q. Okay. 11:54
18 A. And that rank will be on a specific 11:54
19 module. 11:54
20 Q. I see. 11:54
21 Can you take a look at Perego Figure 6B, 11:54
22 for example. 11:54
23 Are you there? 11:54
24 A. Yes. 11:54
25 Q. So there are -- so there are 400a, 400b 11:54

and 400c. Each is a memory module; is that correct?
A. Correct. 11:55
Q. And there are two ranks in each of the 11:55
memory module; is that correct? 11:55
A. Correct. 11:55
Q. Is that the same for 6A, Figure 6A? 11:55
A. There are only two modules in 6A, but 11:55
otherwise that's the same. 11:55
Q. Okay. So in 6A there are two modules with 11:55
two ranks each? 11:55
A. Correct. 11:55
Q. And the chip select signal would be 11:55
selecting an entire rank; is that right? 11:55
A. It depends where you're looking at it. 11:56
Q. What do you mean, like, where you're 11:56
looking at it? 11:56
A. If you are looking at it from the 11:56
perspective of the processor, it's selecting a 11:56
module. And then, depending on the implementation, 11:56
you would either use a bank address signal or an 11:56
address signal to determine the actual rank. 11:56
Q. But it would be -- let's take one step 11:56
back. 11:56
Let's look at the configuration in 11:56
Figure 6B. 11:56

A. Okay. 11:56
Q. Let's assume that 400a is selected. And 11:56
when a chip select signal is applied, four of the 11:56
devices will be selected at a time; is that correct? 11:57
MR. CHANDLER: Objection. Form. 11:57
THE WITNESS: Ultimately that is what's 11:57
going to happen. But the chip select signal going 11:57
to 400a would inform the buffer that it should 11:57
either select the left-hand or right-hand rank. 11:57
And then, again, depending on the 11:57
embodiment, the buffer would then use additional 11:57
information combined with the chip select 11:57
information to decide whether to select the 11:57
left-hand rank or the right-hand rank. 11:57
BY MS. ZHONG: 11:57
Q. Okay. And when a rank is selected, it 11:57
will be selected in a group of four for the 11:57
embodiments shown in Figure 6B; is that correct? 11:57
A. If you have a four wide -- four device 11:57
wide rank, that will be the case. Figure 6B is 11:57
illustrative, and I don't think it only applies to 11:58
four device slide ranks. 11:58
Q. If you only have a single device per 11:58
channel, the memory capacity would be one-fourth of 11:58
that other memory module having four memory devices 11:58

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per channel, assuming that the memory device all 11:58
have the same capacity; is that fair? 11:58
A. That's fair. If you assume that the 11:58
memory devices all have the same capacity, then 11:58
having four memory devices would give you four times 11:58
the capacity of one device. 11:58
Q. Okay. So if you -- if you have a memory 11:58
module with places for four memory devices per rank, 11:58
and if your goal is to expand the capacity of that 11:59
memory module, it would not really make any sense 11:59
for you to only place a single device in that rank; 11:59
is that right? 11:59
A. That just doesn't seem consistent with my 11:59
understanding of the way memory modules are 11:59
designed. You design a memory module based on how 11:59
many chips you want to have and how wide you want it 11:59
to be, and you custom design it for that one 11:59
situation. 11:59
Q. So, like, let's take a look at the 11:59
Figure 6B configuration shown here. This shows 11:59
there are eight memory devices -- 11:59
A. Yes. 11:59
Q. -- on one side of that device, correct? 11:59
A. That seems to -- what's illustrated is 11:59
four to the left and four to the right in this 12:00

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1 particular illustration. 12:00
2 Q. Okay. And so if I want to expand the 12:00
3 memory capacity, it would not make any sense for me 12:00
4 to get rid of six of the eight memory devices on 12:00
5 that module; is that correct? 12:00
6 A. That's correct. Assuming that you wanted 12:00
7 to expand the capacity of this particular module as 12:00
8 opposed to designing a module for a different 12:00
9 purpose that would be disclosed in Perego. 12:00
10 Q. Okay. And assuming that I only want to 12:00
11 use two chips to achieve the same capacity as using 12:00
12 eight chips, the density per chip has to increase by 12:00
13 a factor of four? Does that sound correct? 12:00
14 MR. CHANDLER: Object to form. 12:01
15 THE WITNESS: If you make all those 12:01
16 assumptions, that would be correct. But again, 12:01
17 those aren't always valid assumptions. 12:01
18 BY MS. ZHONG: 12:01
19 Q. And a memory chip with four times the 12:01
20 memory density would be more costly than a memory 12:01
21 chip that is 1x density? Does that sound fair? 12:01
22 A. That's not always true, but it's true in 12:01
23 certain market segments. 12:01
24 Q. In which market segments is that true? 12:01
25 A. It's true when the lower-capacity chip is 12:01

a mainstream chip and the higher-capacity chip is 12:01
just entering production. 12:01
Q. Okay. So let's take a look at your 12:02
declaration. Why don't we go to page 92 of your 12:02
declaration. 12:02
Do you see a Table 2 and Table 3 on that 12:02
page? 12:02
A. I do. 12:02
Q. Okay. What is showing in Tables 2 and 3? 12:02
A. These are examples of JESD79-2 compliant 12:02
memory configurations. 12:02
Q. And in Table 2, those are SDRAMs with 12:02
512-megabit density; is that correct? 12:02
A. Correct. 12:02
Q. And what is the difference between by x4, 12:03
x8, and x16 format? 12:03
A. The number of data pins that are present 12:03
on each individual device. 12:03
Q. Can you be more specific? What do you 12:03
mean by the number of data pins that are present on 12:03
each individual device? What's the difference 12:03
between x4, x8, and x16? 12:03
A. x4 has four data pins per individual 12:03
device. X8 has eight data pins per individual 12:03
device. And x16 has 16 data pins per individual 12:03

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device. 12:03
Q. Okay. So let's take a look at Figure 2, 12:03
the 512-megabit DRAM devices. 12:03
What does 32 megabits mean in the 12:03
configuration on the right-hand side for the x16 12:03
configuration? 12:04
A. In Table 2? 12:04
Q. Yes. Table 2. So Table 2 -- 12:04
A. It means there are -- 12:04
Q. -- means 32 megabits -- I'm sorry. 12:04
A. It means there are 32 million entries in 12:04
that memory, each of which contains 16 bits. 12:04
Q. And what's the cost difference between a 12:04
32Mbx16 DRAM device versus a 62 -- 64Mbx8 device? 12:04
A. It depends on the market at the time. 12:04
Q. What's the market at the time? What's the 12:04
cost difference? 12:04
A. I don't know. I mean, it could vary from 12:04
week to week, and depending on manufacturing 12:04
shortages and trends and what's common in various 12:04
computers. 12:05
Usually early in introductions, 64Mbx8 is 12:05
cheaper, and then over time the 32Mbx16 becomes 12:05
cheaper. 12:05
Q. So initially 64Mbx8 is actually cheaper 12:05

than the 32Mbx16? 12:05

A. It's ordinarily what happens. 12:05

Q. And is 124Mbx4 initially cheaper than the 12:05
64Mbx8 and the 32Mbx16 initially then? 12:05

A. It depends on the exact details or the 12:05
timing of when these parts get introduced versus 12:05
when new operating systems get introduced. 12:05
Sometimes it's cheaper, sometimes it's not. 12:05

Q. What's the cost difference between four 12:05
32Mbx16 versus two 64Mbx16 SDRAM device? 12:06

A. Again, it depends when. 12:06

Q. Let's just say in mass production. 12:06

A. Depends where they are in the cycle. 12:06

Sometimes Table 3 devices can be more 12:06
expensive, especially early on in the cycle, and 12:06
sometimes they can be less expensive. That's why 12:06
they are both in the market is because it's hard to 12:06
predict which is going to be more expensive in 12:06
practice. 12:06

Q. So the 128Mbx8 device is not necessarily 12:06
more expensive than the 64Mbx8 device; is that 12:06
right? 12:06

A. Not -- you're saying per device or per 12:07
unit of memory? 12:07

Q. Per device. 12:07

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A. Not necessarily. But usually the 128x8 is 12:07
going to be more expensive than the 64x8. 12:07
Q. What about per memory? 12:07
A. That will vary over time. 12:07
Q. How does it vary over time? 12:07
A. Based on yields, supply and demand, when 12:07
the 128x8s are rare and hard to get, they can cost 12:07
more than two 64Mbx8s. But as they become more 12:07
mature and more common, they can get cheaper than 12:07
two 64Mbx8s. 12:07
Q. So it really depends on the cycle? 12:07
A. Yes. 12:07
Q. So by 2004, 2005, do you have any sense as 12:08
to which memory device would be cheaper per memory 12:08
unit? 12:08
A. I don't recall the exact pricing from that 12:08
time period. But I would expect that there would be 12:08
examples on the market that would be commonly known 12:08
where high-density memory was more expensive than 12:08
using low-density memory for the same capacity. And 12:08
there would be examples of the opposite as well. 12:08
Q. So when would you use, for example, four 12:09
32Mbx16 DRAM device on a -- on a module instead of 12:09
two 64Mbx16 DRAM device? 12:09
A. There are two situations. One is if you 12:09

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1 wanted to build a x64 module, then you would do 12:09
2 that. The other example is when four 32Mbx16 chips 12:09
3 is cheaper than two 64Mbx16 chips or more readily 12:09
4 available, you might do it in that situation as 12:09
5 well. 12:09
6 Q. And reason number one, you are assuming a 12:10
7 x64 memory module as well as all four of the DRAM 12:10
8 devices would be used in one rank; is that correct? 12:10
9 A. In that particular situation, yes. 12:10
10 Q. So what if you are using a x16 memory 12:10
11 module width and you are trying to build a 2-gigabit 12:10
12 memory -- let's take one step back. 12:10
13 Let's say that you are trying to build a 12:10
14 memory module with x16 bit width. Do you get that? 12:11
15 A. Okay. 12:11
16 Q. Then each of the x16 device would need to 12:11
17 be in its own rank by your definition, correct? 12:11
18 A. Yes, that would normally be what you would 12:11
19 do. 12:11
20 Q. Okay. So in that situation, when would 12:11
21 you be using a four 32Mbx16 device organized in 12:11
22 supposedly four ranks versus two 64Mbx16 DRAM device 12:11
23 organized in supposedly two ranks? 12:11
24 A. There would be a number of motivations to 12:11
25 do it. One would be a pricing analysis. 12:11

Q. Okay. 12:12
A. Another would be a performance analysis 12:12
based on the fact that having more ranks will 12:12
typically allow you to have more pages open at a 12:12
time. Those would be the two primary things that 12:12
you would consider. 12:12
Q. What about power consumption? Would there 12:12
be any difference? 12:12
A. So the choice is two ranks -- or four 12:12
ranks of 32Mb versus two ranks. Yes, the four ranks 12:12
would have lower power consumption under typical use 12:12
conditions. 12:12
Q. Why is that? 12:12
A. Because the number of chips responding to 12:12
any individual command would be smaller. That would 12:12
be the primary reason. And the increased number of 12:12
available pages would be the other reason. 12:12
Q. What do you mean by the increased number 12:13
of available pages? 12:13
A. You have one page register per bank. So 12:13
in the case of four 32Mbx16, you would have 16 banks 12:13
of memory, with a "B," 16 bits wide, where in the 12:13
case of four 64Mbx8s arranged in two ranks, you 12:13
would have eight banks -- with a "B" -- with eight 12:13
page registers, each 16-bit wide. So that's a 12:13

1 little bit lower performance in most situations 12:13
2 and -- 12:13
3 (Simultaneous speakers.) 12:13
4 Q. Then -- 12:14
5 A. -- power -- 12:14
6 Q. Okay. Then would the 64Mbx8 and the 12:14
7 32Mbx16, would they have similar power consumption? 12:14
8 A. It depends what you mean by "similar." I 12:14
9 think generally, in the configurations that we 12:14
10 talked about in the last question, the 32Mbx16 would 12:14
11 be the lower power option. But there are various 12:14
12 trade-offs one has to look at depending on whether 12:14
13 it's buffered or unbuffered and cost. 12:14
14 Q. When you say buffered and unbuffered, what 12:14
15 do you mean? 12:14
16 A. You have to look at the actual loading on 12:14
17 individual signal lines in an unbuffered device, and 12:14
18 that may limit your options or it may limit the 12:14
19 speed of some of your options. You have to look at 12:14
20 the details. In a buffered device, that's less of 12:14
21 an issue. 12:15
22 Q. When you say buffered, what buffer are you 12:15
23 talking about? Data buffer? Control signal buffer? 12:15
24 A. Any -- any of those. You would have to 12:15
25 analyze them all. 12:15

Q. In Perego's case are there buffers? 12:15
A. Yes, in Perego's case I believe everything 12:15
is buffered. 12:15
Q. And did you perform an analysis for that 12:15
buffered DRAM as to the power consumption and the 12:15
performance difference for -- for a memory module 12:15
with four x8 device versus a memory module with four 12:15
x30 -- x16 device? 12:15
A. No. That would be an ordinary engineering 12:16
task. It would depend on the -- on the very 12:16
detailed specifications of the individual devices 12:16
that you were using, and it would be part of any 12:16
engineering implementation to do that analysis. Not 12:16
to see which one's better but just to make sure that 12:16
both choices are viable. 12:16
Both choices would definitely be viable 12:16
under certain conditions. You'd have to look at the 12:16
conditions for your particular design. 12:16
And as I mentioned, there are fundamental 12:16
principles that would indicate that the x16 simply 12:16
involves fewer chips and has more banks, and 12:16
therefore, would generally be preferable in terms of 12:16
power consumption. 12:16
Q. So we're talking about 4x4 -- let me 12:17
withdraw that. 12:17

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We're talking about four 32Mbx16 chip 12:17
versus four 16Mbx8 chips, correct? 12:17
A. Correct. 12:17
Q. So they would have the same number of 12:17
chips and banks? 12:17
A. No. I can see why that would be 12:17
confusing. 12:17
The fact is, if you were to use the 64Mbx8 12:17
in a x16 configuration, you would have to use the 12:17
chips in pairs for each access. So you would not 12:17
get 16 banks. You would only get eight. 12:17
Q. But if you use 16Mbx16, that will be the 12:18
same number of chips as when you used 32Mbx16; is 12:18
that right? 12:18
A. 16Mbx16 versus 32Mbx16? 12:18
Q. No, 64Mbx16. So the last entry in 12:18
Table 3. 12:18
A. It would be the same number of chips but 12:18
different capacity, yes. 12:18
Q. Okay. So -- and there are more banks per 12:18
chip for the 64Mbx16 than the 32Mbx16, correct? 12:18
A. In this generation, that was correct, yes. 12:18
Q. So wouldn't that mean the 64Mbx16, it 12:18
would be -- actually consume less power per memory 12:19
unit than the 32Mbx16? 12:19

A. Ordinarily that would be the case, but you would have to look at the details. It would depend on -- it would depend on a lot of details. 12:19

Q. Okay. So ordinarily, if you use two 64Mbx16 memory module, it will consume less power than a memory module with four 32Mbx16 devices, assuming that the module bit width is 16. 12:19

Does that sound right? 12:19

A. Again, it depends on the details, but that would ordinarily be the case or most commonly be the case. The reason one would not do that is it might cost 10 times as much at certain points in the product cycle. 12:19 12:20 12:20 12:20

Q. Okay. But once they both get to the mass production phase, the memory cost would at least be comparable, if not cheaper, for the 64Mbx16; is that right? 12:20 12:20 12:20 12:20

A. At some point that usually happens, but it's not necessarily when they both meet -- hit mass production. Because it could be that still that the yields are lower. On the -- on the higher-density device, the tooling is more expensive. At some point, historically prices have always crossed over. But it's not always at the point where they both reach mass production. 12:20 12:20 12:20 12:20 12:20 12:20 12:20 12:20 12:20 12:20 12:20 12:20

Q. Okay. And do you know the price 12:20
difference per memory unit in the 2004 and 2005 time 12:21
period? 12:21
A. It would have varied week to week. 12:21
Q. But do you know what the general trend 12:21
was? 12:21
A. No, not off the top of my head. 12:21
Q. And ordinarily would a memory module with 12:21
two 64Mbx16 memory device perform better than a 12:21
memory module with four 32Mbx16 device, assuming the 12:21
bit width is x16 for the memory module? 12:21
A. In the majority of cases for these 12:21
generations, I believe that it would. But again, it 12:21
may be cost prohibitive. 12:21
Q. Okay. We've been talking about memory 12:22
modules. What is your understanding of what a 12:22
memory module is? 12:22
A. In the context of these patents, it's 12:22
typically a printed circuit board that has one or 12:22
more memory chips soldered on it along with 12:22
potentially one or more supporting components. 12:22
Q. So if you have a PCI card with memory 12:22
disposed on them, are they memory modules? 12:22
A. It depends on the time frame and the 12:22
concept -- context. Certainly the PCI replaced the 12:22

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ISA bus. And in the early days of the ISA bus, 12:22
there were certainly memory modules that went onto 12:22
an ISA bus. 12:22
But by the 2004-2005 time frame, I think 12:22
the intent, or the usage of that term in the '912 12:23
patent seems to be consistent with a memory module 12:23
that was intended to go into a dedicated memory slot 12:23
and not a general-purpose IO slot. 12:23
Q. Okay. So like by 2004-2005 time period, 12:23
if a person of ordinary skill in the art at one time 12:23
was talking about memory module, they are thinking 12:23
about a printed circuit board that's going to be 12:23
inserted into a memory slot rather than a 12:23
general-purpose bus slot. 12:23
Does that sound right? 12:23
MR. CHANDLER: Objection. Form. 12:23
THE WITNESS: I think that would be the 12:23
most common, but I think they would be familiar with 12:23
both. 12:23
BY MS. ZHONG: 12:23
Q. I'm just asking you, when a person of 12:24
ordinary skill in the art hear the word "memory 12:24
module," what would they understand it to be? 12:24
A. I think they'd look for context. And in 12:24
the context of the '912 patent, I think that they 12:24

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are looking for something that would go into a 12:24
dedicated memory slot. But in another context, they 12:24
may be looking for something broader. 12:24
Q. And in what context would they understand 12:24
it to be something broader? 12:24
A. There are many historical systems I can 12:24
think of. The VME bus computers. The IDE bus 12:24
computers in which memory modules were commonly 12:24
placed in general-purpose slots. Again, I think it 12:24
just depends on what the context of the system is. 12:24
Q. And when you say VME bus computers, IDE 12:24
bus computers, those were old computer systems 12:24
predating -- before like 2000; is that correct? 12:25
A. They were predominantly before 2000. They 12:25
were still in use in 2000, but they weren't popular. 12:25
Q. Would they have been phased out by the 12:25
2007-2008 time period? 12:25
A. I don't know. They wouldn't have been 12:25
common on desktops, but they survived for a long 12:25
time in -- in industrial applications. 12:25
Q. '912 deals with the concept of rank 12:26
multiplication, correct? 12:26
A. It does. 12:26
Q. When is rank multiplication used? 12:26
Let me withdraw and reask. 12:26

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When would a person of ordinary skill in the art apply the rank multiplication concept? 12:26

A. Whenever they had any reason to use a larger number of low-density memory devices instead of a smaller number of high-density devices, or in some cases where only the devices -- where there's not a distinction in terms of density but there's a distinction in terms of availability. 12:26

Q. When you say "availability," what availability? 12:27

A. In other words, if I have two kinds of memories that have the same density. And I could potentially use one without rank multiplication and one with rank multiplication. But the one that would be used without rank multiplication isn't available in the quantities that I need. Then I could use the rank multiplication instead. 12:27

Q. So for commodity SDRAMs, the second reason for availability is less of a concern; is that correct? 12:27

A. No. Historically commodity SDRAMs have been cyclical in terms of their price and availability. So there are periodic shortages. That's one of the things that has actually driven variations in memory module implementation. 12:27

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Q. And when would you use lower-density 12:28
memory devices instead of high-density memory 12:28
devices? 12:28
A. There could be a number of reasons. But 12:28
primarily it's either because you get a lower cost 12:28
per unit or you have improved availability. 12:28
Q. When you say "lower cost per unit," what's 12:28
a unit, memory unit? 12:28
A. Yeah, unit of storage. 12:28
Q. And when wouldn't you use rank 12:29
multiplication? 12:29
A. There's a number of considerations. If 12:29
you wanted to use a small number of memory devices 12:29
and that was your cheapest approach, that could be a 12:29
reason not to use rank multiplication. 12:29
If you wanted to build a very simple 12:29
device that had the smallest amount of additional 12:29
logic on the DIMM, that could be motivation. 12:29
But again, usually the motivation is total 12:30
cost per unit memory, which can change over time. 12:30
So often in the late stages of a generation of 12:30
memory devices, you can build a complete DIMM with 12:30
one or two or four or eight devices in a single rank 12:30
cheaply. And at that point, rank multiplication may 12:30
not solve the problem for certain customers. 12:30

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Q. But if you have -- but if there's only a 12:30
single device per rank, would cost still be a 12:30
consideration? 12:31
A. Could be. So, for example, if I'm -- if 12:31
I'm making computers for 3rd graders and I can have 12:31
them run the software using a one-rank, one-device 12:31
memory system, that could be very cheap and 12:31
effective. 12:31
Q. Why would you even have a memory module if 12:31
there's only a single device per rank? Can't you 12:31
just connect the DRAM directly to the memory system? 12:31
A. You can, but there are many reasons why 12:31
you may not want to. One of those may be you want 12:31
to repurpose the same computer system for different 12:32
markets. So you may want to have a version with 12:32
more memory that you sell to 6th graders than the 12:32
one that you sell to 3rd graders. 12:32
Another version -- reason may be, as you 12:32
said, memory tends to be a commodity so you don't 12:32
want to commit to a particular chip at the time that 12:32
you're making the boards. Instead, at the time that 12:32
you sell the computer out the door, you want to 12:32
purchase your memory on a module just in time since 12:32
you don't have the carrying costs to that memory. 12:32
Those are some of the common reasons. 12:32

1 MS. ZHONG: Do you want to take a lunch 12:32
2 break right now? 12:32
3 THE WITNESS: We can do that. 12:32
4 MS. ZHONG: Do you want to take an hour? 12:33
5 MR. CHANDLER: That's fine. 12:33
6 (Whereupon a luncheon recess was had.)
7 (Off record: 12:33 p.m.) 12:33
8
8 (On record: 1:30 p.m.) 12:33
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Wednesday, January 4, 2023 01:30
1:30 p.m. 01:30
01:30
MS. ZHONG: We can go back on the record. 01:30
EXAMINATION (resumed) 01:30
BY MS. ZHONG: 01:31
Q. Dr. Wolfe, can you pull up Exhibit 1004 01:31
{sic}, which is U.S. Provisional Application 01:31
60/588244. 01:31
(Exhibit 1005 was marked for 01:31
identification and attached 01:31
hereto.) 01:31
BY MS. ZHONG: 01:31
Q. Do you have that document? 01:31
A. Give me the exhibit again. 01:31
Q. Exhibit 1005. Exhibit 1005. 01:31
MR. CHANDLER: Can we pause for a moment? 01:31
My colleague got kicked out from the Zoom and he's 01:31
coming back in. 01:31
MS. ZHONG: So let's go off the record 01:31
while waiting for him then. 01:31
(Brief pause in proceedings.) 01:31
BY MS. ZHONG: 01:32
Q. Do you have Exhibit 1005, Dr. Wolfe? 01:32
A. Yes. 01:32

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Q. You are familiar with this document, 01:32
correct? 01:32
A. Yes. 01:32
Q. Can you please take a look at paragraph 10 01:32
through 19. 01:32
A. Okay. 01:32
Q. Do you see there's a Table 1 in 01:33
paragraph 11? 01:33
A. Yes. 01:33
Q. In Table 1, follows 2, 3, 4 and 5 have the 01:33
headings CS0, CS1, An+1 and Control. 01:33
Do you see that? 01:33
A. I do. 01:33
Q. Are those input signals received from the 01:33
memory system in order to select the rank? 01:33
A. A subset of them are in some cases. 01:34
Q. Are those the signals that's received by 01:34
the ASIC depicted in Figure 1? 01:34
A. They appear to be with the distinction 01:34
that in Table 1 there's only a single control 01:34
signal. And in the text it explains that only a 01:34
single control signal is required. 01:34
Q. What do you mean by only a single control 01:34
signal is required? 01:34
A. Let me see if I can find that. 01:35

1 Paragraph 10, it says at least one control 01:35
2 signal. 01:35
3 Q. Okay. If you look at paragraph 11, 01:35
4 note 4, that describes what the control in Table 1 01:35
5 refers to; is that correct? 01:35
6 A. Yes. 01:35
7 Q. Okay. So in Table 1, the control refers 01:35
8 to a number of control signals that define 01:35
9 operations such as refresh, precharge, and other 01:35
10 operations, correct? 01:35
11 A. That is what note 4 says. 01:35
12 Q. And what would those control signals be if 01:35
13 the DRAM is JEDEC compliant on the DRAM -- 01:36
14 THE REPORTER: I'm sorry. "If the DRAM 01:36
15 is"... 01:36
16 BY MS. ZHONG: 01:36
17 Q. And what would those control signals be if 01:36
18 the DRAM is a JEDEC compliant DRAM device? 01:36
19 A. Well, there are many different kinds of 01:36
20 JEDEC compliant DRAM devices, but a typical example 01:36
21 could be RAS, CAS, and write enable. 01:36
22 Q. Does it need to have chip select signal? 01:36
23 A. No, because the chip select signals are 01:37
24 separately defined CS0 and CS1. 01:37
25 Q. Okay. And for read and write operation, 01:37

1 does it also need to -- does bank address 01:37
2 information also need to be provided? 01:37
3 A. Again, there's nothing that needs to be 01:37
4 provided other than something that performs the 01:37
5 function. But I would not expect bank address to be 01:37
6 provided. I don't -- I'm not aware right now of a 01:37
7 situation where bank address defines operation such 01:37
8 as refresh and precharge. 01:37
9 Q. So you mean -- what about a read and a 01:37
10 write? 01:37
11 A. What about them? 01:37
12 Q. So are read and write operation, do bank 01:37
13 addresses need to be provided in order to define the 01:38
14 operation? 01:38
15 A. They may need to be provided to the memory 01:38
16 chip in order to identify where the operation should 01:38
17 take place, but they don't need to be provided to 01:38
18 the ASIC decoder that's shown in Figure 1. 01:38
19 Q. The ASIC decoder says the control involves 01:38
20 control signals that define operations, correct? 01:38
21 A. No, that's what Table 1 says. 01:38
22 Q. And paragraph 19 says, "The 'Control' 01:38
23 column of Table 1 represents the various commands 01:38
24 that a DRAM device can execute, examples of which 01:38
25 include, but are not limited to, activation, read, 01:38

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1 write, precharge, and refresh," correct? 01:39
2 A. Correct. 01:39
3 Q. And we discussed earlier that for a JEDEC 01:39
4 compliant SDRAM, the command for a read and write 01:39
5 operation and activation would include bank address 01:39
6 signals, correct? 01:39
7 A. We're talking about different things here. 01:39
8 So, one -- there's nothing in Figure 1 01:39
9 that indicates that that's a JEDEC compliant DRAM. 01:39
10 But even so, the discussions we had before were 01:39
11 about what the DIMM module would receive, not what 01:39
12 an ASIC decoder on a DIMM module would receive. And 01:39
13 those are two different issues. 01:39
14 Q. Okay. I'm just asking the control 01:39
15 information of the command signals that a DRAM -- 01:39
16 let me withdraw and ask. 01:40
17 The commands that a DRAM device can 01:40
18 execute includes a read operation command, correct? 01:40
19 A. It would depend what kind of DRAM device. 01:40
20 But that would be true for most DRAM devices is that 01:40
21 there's some type of a read operation. 01:40
22 Q. Okay. So let's say, since you are only 01:40
23 citing the JEDEC compliant DRAM devices, for those 01:40
24 DRAM devices, the commands for a read and write 01:40
25 operation includes bank address information, 01:40

correct? 01:40
A. Let's be clear. I'm not only citing JEDEC 01:40
compliant DRAM devices. And where I do cite them, 01:40
it's to illustrate the obviousness issues with 01:41
respect to particular references. The -- I would 01:41
not rely on the JEDEC compliant DRAM specification 01:41
as a way to understand what's disclosed in 01:41
Exhibit 1005. 01:41
Q. The DRAMs in Exhibit 1005 are to be used 01:41
with a general personal computer, correct? 01:41
A. Yes. 01:41
Q. And we agree that a JEDEC compliant DDR or 01:41
DDR2 DRAM device in order to execute -- let's 01:42
withdraw -- let me withdraw and reask. 01:42
So the commands are for a read operation 01:42
for a DRAM device that is compliant with JEDEC 01:42
standard would include bank address information; is 01:42
that correct? 01:42
A. As I said, there are many, many JEDEC 01:42
standards. I can't generalize about all of them. 01:42
Q. Okay. The JEDEC standards you cited. 01:42
A. I would not consider the bank addresses to 01:42
be part of the command, no. They are supplied along 01:42
with a command, but in the -- for example, 01:42
Exhibit 1029, when I look at a command like the bank 01:43

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activate command, the bank activate command is 01:43
issued by holding CAS bar and write enable bar high 01:43
with chip select bar and RAS bar low at the rising 01:43
edge of the clock. 01:43
Q. And bank address signal is supplied with 01:43
those commands in order to execute the bank 01:43
activation? 01:43
A. It is supplied to the DRAM chip along with 01:43
the command. It is neither part of the command nor 01:43
is it something that necessarily would go through a 01:43
separate logic circuit. 01:43
Q. Okay. And I think you mentioned earlier 01:43
that it is not necessary for the larger component to 01:43
actually receive the bank address signal. All it 01:43
requires for a JEDEC compliant SDRAM is for the DRAM 01:44
itself to receive the bank address; is that correct? 01:44
A. In order to use a DRAM chip such as the 01:44
kind that's described in Exhibit 1029, that is 01:44
correct. 01:44
Q. Okay. So the bank address signal need not 01:44
be received by a larger element? 01:44
A. Not in every utilization of a DDR2 device, 01:44
no. 01:44
Q. Okay. And so is there anything in Perego 01:44
actually mentions the bank address signal being 01:45

passed to the buffer address -- buffer device? 01:45
A. I believe all the signals that are 01:45
communicated in Perego from the host are passed 01:45
through buffer devices. 01:45
Q. Does Perego actually mention a bank 01:45
address in particular? 01:45
A. It mentions memories that have banks. And 01:45
it mentions specific memory types like DDR that 01:46
would -- a person of ordinary skill would understand 01:46
has a bank address. 01:46
Q. So if you mention DDR or DDR2, does that 01:46
necessarily mean a JEDEC compliant DDR or the DDR2 01:46
device? 01:46
A. No, not always. But it would certainly 01:46
cause a person of ordinary skill to find the use of 01:46
one obvious. 01:46
Q. So in Figure number 1, how would the bank 01:47
-- (indiscernible.) 01:47
THE REPORTER: I'm sorry, Counsel. 01:47
Counsel, can you speak more to your right? We're 01:47
losing you. Thank you. 01:47
BY MS. ZHONG: 01:47
Q. So in Figure number 1, if the DRAM device 01:47
is a DDR or DDR2 JEDEC compliant device, how would 01:47
the bank address information be provided to that 01:47

DRAM device? 01:47

A. Figure 1 of Perego? 01:47

Q. No, Figure 4, Exhibit 1005. 01:48

A. So, again, there's no mention of JEDEC 01:48

standard devices. But if one were to choose to 01:48

implement Figure 1 of 1005 with DDR2 JEDEC compliant 01:48

devices like in Exhibit 1029, they would have to 01:48

consult Exhibit 1029 to figure out how to connect 01:48

them up. 01:48

And presumably they would simply take the 01:48

bank address signals directly from the host bus and 01:48

connect them directly to each memory device. That 01:48

would certainly be the simplest way to implement it. 01:48

Q. Would the bank address information be 01:49

required to operate a JEDEC compliant DDR or DDR2 01:49

device? 01:49

A. I don't know that I could look -- I'd have 01:50

to think about it. 01:50

No, I mean, it's not required in all 01:50

circumstances. But if one were to build an ordinary 01:50

PC memory module, one would -- typically at that 01:50

time, the simplest thing to do would be to connect 01:50

the bank address signals directly from each memory 01:50

device to the host computer memory controller. 01:50

Q. Even when you have a register? 01:50

A. Well, it depends why you have a register. 01:50
In this particular case, the register is quite 01:50
limited and is only used for a subset of address 01:50
signals. 01:50
Q. What about on the -- (indiscernible.) 01:50
THE REPORTER: I'm sorry? 01:51
THE WITNESS: What about on the what? 01:51
BY MS. ZHONG: 01:51
Q. On the (indiscernible) -- 01:51
THE REPORTER: I don't -- 01:51
MS. ZHONG: It's on Exhibit 1032. 01:51
MR. CHANDLER: Are you saying registered 01:51
DIMM, the letter R DIMM? 01:51
MS. ZHONG: Yes. 01:51
MR. CHANDLER: Okay. 01:51
THE WITNESS: And what's the question 01:51
about the registered DIMM? 01:51
BY MS. ZHONG: 01:51
Q. Okay. So for the DIMM that's described in 01:51
Exhibit 1032 -- 01:51
A. Yes. 01:51
Q. -- where are the advance signals sent? 01:51
A. In the DIMMs that are described in 01:51
Exhibit 1032, the bank signals from the host 01:51
computer are registered. And then the registered 01:51

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1 copies of those signals are sent to each of the 01:52
2 SDRAM chips. 01:52
3 Q. For the registered DIMM shown in 01:52
4 Exhibit 1032, does that register have any logic 01:52
5 function? 01:52
6 A. Not in the way I would normally use that 01:52
7 term, no. It's simply register. 01:52
8 Q. How would you use -- what's your 01:52
9 definition of a logic element? 01:52
10 A. Well, again, it depends on context. But 01:52
11 in the context of something like the '912 patent or 01:52
12 Exhibit 1005, I would think that a logic element 01:52
13 performs logic functions by combining multiple 01:52
14 signals for the purpose of incorporating a logic 01:53
15 equation and not simply delaying a signal. 01:53
16 Q. Okay. And what is sequential logic? 01:53
17 A. What is sequential logic? 01:53
18 Q. Yes. 01:53
19 A. Sequential logic -- again, you have to 01:53
20 look at the context. Normally it describes a 01:53
21 combination of logic functions and registers. 01:53
22 Q. What do you mean by "It describes a 01:53
23 combination of logic functions and registers"? 01:53
24 A. I don't know how to simplify this down to 01:53
25 a single statement. It takes us hours or days to 01:53

explain it to students. 01:54

But sequential logic implements what we 01:54

call state machines, which are time-variant logic 01:54

functions that can perform different logic equations 01:54

at different points in time based on the storage of 01:54

what we call state partial results. 01:54

Q. Okay. So in order to implement a 01:54

sequential logic, normally you would need to have 01:54

both electrical elements that execute the logic 01:54

function and also storage elements that store the 01:54

state of the device? 01:54

Does that sound correct? 01:54

A. It would normally -- 01:54

MR. CHANDLER: Objection. Form. Also 01:54

incomplete hypothetical. 01:54

THE WITNESS: Generally, to perform a 01:55

sequential logic function the way that I've defined 01:55

it, you would need both state storage in the form of 01:55

a register or an equivalent, plus some what we call 01:55

combinational logic functions. 01:55

That doesn't mean that the same signals 01:55

are provided to both, or it doesn't mean that they 01:55

work in any particular way, but they would both 01:55

somehow be present. 01:55

BY MS. ZHONG: 01:55

Q. Okay. What is combinatorial logic? 01:55

A. Combinatorial logic is logic that does not 01:55
store results, basically. 01:55

Q. So basically it's -- it generally only 01:55
refers to the logic operation without the storage 01:55
unit? 01:55

A. Correct. Generally, a change in input 01:55
would be reflected as a change in output and a clock 01:55
is not required. 01:55

Again, you know, it gets more complicated 01:55
than that when you dig into the details, but that's 01:55
kind of a -- a very high-level overview. 01:56

Q. Okay. Is that something a POSITA would 01:56
have understood in 2004 and 2005 as to what 01:56
sequential logic and combinatorial logic is? 01:56

A. They would have understood the textbook 01:56
definitions, yes. 01:56

Q. You said that the -- why don't you pull up 01:56
Exhibit 1009, the patent ending with '436. 01:56

A. Okay. 01:57

(Exhibit 1009 was previously 01:57
marked for identification and 01:57
attached hereto.) 01:57

BY MS. ZHONG: 01:57

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Q. Is it your opinion that '436 patent does 01:57
not describe the solution for the back-to-back 01:57
adjacent reads with cross memory device boundary? 01:57
A. It does not. 01:57
Q. And what is a back-to-back adjacent read 01:58
command issue that we're talking about? 01:58
A. That when commonly available protocols at 01:58
the time, such as the DDR and DDR2 protocols, were 01:58
used together with a very simple rank multiplication 01:58
scheme, there was a problem when a read command went 01:58
to one rank and a subsequent read command went to 01:58
another rank in that certain signals were driven for 01:58
a longer time period than it would take to simply 01:58
respond or to simply provide the data in response; 01:58
that there were preambles and postambles in the 01:58
response signals. 01:59
And if one simply connected up two ranks 01:59
to be sequentially accessed, those signals could 01:59
conflict with each other. And some mechanism had to 01:59
be introduced in order to distinguish those signals 01:59
or to block one of those signals so that there would 01:59
be no interference. 01:59
Q. So it's -- is it essentially a DQS bus 01:59
conflict situation then? 01:59
A. Did you say d2s? 01:59

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Q. DQS, Q as in quiet. 01:59
A. Let me look at the actual signal name 01:59
there, yes. 01:59
That's -- that's the -- the significant 01:59
one. There's DQS and DQS bar in some generations. 01:59
And that's where the preamble and postambles would 02:00
exist. 02:00
And one of them -- either the timing needs 02:00
to be adjusted between the two ranks or one of those 02:00
DQS response signals to a read needs to be blocked 02:00
or they need to be combined. 02:00
Q. Okay. So basically we're talking about a 02:00
DQS bus conflict situation, how to resolve it? 02:00
A. That's the most common situation that 02:00
would come up, yes. 02:00
Q. Okay. Let's see. 02:00
Can you pull up Exhibit 1030, page 19. 02:00
A. Yes. 02:01
Q. And you reference the Figure 8 in your 02:01
discussion of the read -- the back-to-back read 02:01
situation. 02:01
Is Figure 8 depicting a back-to-back read 02:01
that's across rank boundaries? 02:01
A. So the -- the -- the simplest 02:01
interpretation of Figure 8 is that it represents 02:01

burst read operation to a single device. However, 02:01
if one were to implement a system in which two ranks 02:01
are made to appear as if they are one larger device, 02:02
then this same protocol would be used across ranks 02:02
but in a way that would not operate properly unless 02:02
some accommodations were made. 02:02
Q. But it says -- on Figure 8 it says, "Read 02:02
commands shown must be to the same device," correct? 02:02
A. It does. And the reason that that's still 02:02
apropos in a system that uses rank multiplication is 02:02
that the host believes that the read command is 02:02
going to the same device and, therefore, expects to 02:02
use this protocol, when in fact the actual read 02:02
commands would be duplicated as part of the rank 02:02
multiplication and, therefore, go to separate 02:02
devices. That's what causes the conflict that must 02:03
be resolved. 02:03
Q. And so your interpretation of the same 02:03
device refers to the device in the same rank; is 02:03
that correct? 02:03
MR. CHANDLER: Objection. Form. 02:03
THE WITNESS: No. When it says "same 02:03
device" on page 19, it means that this protocol is 02:03
intended to support back-to-back reads on the same 02:03
device. However, as I mentioned -- 02:03

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BY MS. ZHONG: 02:03

Q. When the -- 02:03

A. -- already, if the host believes that two 02:03

ranks are in fact the same device, then this 02:03

protocol would be expected by the host as well. 02:03

Q. When you say "the same device," are you 02:03

referring to a single D rank or a rank of D rank 02:03

devices? 02:04

A. In practice, it would be a rank. 02:04

Q. Okay. And so for the back-to-back read 02:04

conflict that you were discussing, if there are ways 02:04

to resolve DQS bus conflict situation, then that 02:04

problem would be solved; is that correct? 02:04

A. It is a solvable problem, but additional 02:04

mechanisms need to be added to the very simplest 02:04

rank multiplication schemes. 02:04

Q. Okay. So if there are schemes to solve 02:04

the bus -- DQS bus conflict problem, then it's not 02:04

an issue, correct? 02:04

A. If you incorporate a mechanism to solve 02:05

the problem, then it is no longer a problem. 02:05

Q. And the problem is a DQS bus conflict 02:05

problem, correct? 02:05

A. That would be the problem that I would be 02:05

most concerned about is the DQS or DQS bar bus 02:05

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conflict. 02:05

Q. Okay. Can you also pull up Exhibit 1029? 02:05

A. Yes. 02:05

Q. Page 28 or 29? Page -- which is the one 02:05

cited for the back-to-back read. Give me a second. 02:05

So on page -- can you go to page 28 and 02:06

29. 02:06

A. Okay. 02:06

Q. And do you see Figure 27 -- 02:06

A. Yes. 02:06

Q. -- on page 28? 02:06

Right above the caption it says, "This 02:06

operation is allowed regardless of same or different 02:06

banks as long as the banks are activated." 02:06

Do you see that? 02:06

A. Yes. 02:06

Q. And the banks here refer to the internal 02:06

independent memory arrays in the DRAM device and not 02:06

a rank; is that correct? 02:06

A. I don't recall whether or not ranks are 02:07

excluded here. It certainly covers -- let's see. 02:07

Burst -- back-to-back bursts. 02:07

Q. So my question is more what does bank mean 02:08

here? Does it mean the bank that we discussed this 02:08

morning referring to the internal device 02:08

organization or it refers to rank? 02:08
A. It refers to the internal device 02:08
organization. But I would have to do some more 02:08
research to determine whether or not this particular 02:08
diagram -- this particular sequence requires that 02:08
the banks be in the same chip. 02:08
Q. So by 2000 -- by the time of Exhibit 1029, 02:08
generally banks in a JEDEC document refers to the 02:08
internal bank organization; is that correct? 02:08
MR. CHANDLER: Objection. Form. 02:08
THE WITNESS: I haven't looked at all the 02:08
documents, but certainly in at least some cases they 02:08
did. 02:09
BY MS. ZHONG: 02:09
Q. You are familiar with this document, 02:09
correct? 02:09
A. I am. 02:09
Q. So what's the use of a bank in this 02:09
document? What is it referring to? 02:09
A. Give me a minute to look it over. 02:09
I'm sorry, I'm having some trouble with 02:10
the viewer here. Give me just a second. 02:10
Looking at 1029? 02:10
Q. Correct. 02:10
A. Certainly that language transition had 02:10

1 started by this point. I don't recall whether or 02:10
2 not it's a 100 percent consistent throughout the 02:10
3 document. 02:10
4 Q. When it talks about bank address inputs, 02:10
5 is it talking about the internal memory array 02:10
6 organization within a device? 02:10
7 A. In 1029 it is, because it's usually 02:10
8 talking about a specific device. 02:10
9 Q. And when it talks about bank activation or 02:11
10 writing to the same bank, that also refers to the 02:11
11 bank within the same device; is that right? 02:11
12 A. It refers to a bank within a device. 02:11
13 Depends on the context as to whether or not it's the 02:11
14 same device. 02:11
15 Q. It's not referring to the bank in that 02:11
16 context? 02:11
17 A. No. It's referring to a specific bank. 02:11
18 But depending on context, that bank may also be in a 02:11
19 different rank. 02:11
20 Q. In Figure 27 on page 28, when it says the 02:11
21 banks are activated, that would be referring to the 02:12
22 internal organization of a memory device; is that 02:12
23 right? 02:12
24 MR. CHANDLER: Object to form. 02:12
25 THE WITNESS: In Figure 27 when it says 02:12

"banks are activated," that means that an individual 02:12
memory array within one or more memory devices has 02:12
been -- has been activated. 02:12
BY MS. ZHONG: 02:12
Q. Can you pull up Exhibit 1007, which is a 02:13
provisional application ending with 59- -- actually, 02:13
pull up Exhibit 1006, provisional application ending 02:13
with 668. 02:13
(Exhibit 1006 was marked for 02:13
identification and attached 02:13
hereto.) 02:13
THE WITNESS: Okay. 02:13
BY MS. ZHONG: 02:13
Q. Can you please go to Figures 1 and 2? 02:13
A. Okay. 02:13
Q. What is -- what is depicted in Figures 1 02:13
and 2? 02:14
A. Figure 1 schematically illustrates a 02:14
configuration in which a DQS pin of a first device 02:14
is connected to a DQS pin of a second device. 02:14
Figure 2 is a timing diagram of the 02:14
voltages applied to the two DQS pins due to 02:14
nonsimultaneous switching. 02:14
Q. Okay. So that is one situation where 02:14
there can be DQS bus conflict, correct? 02:14

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A. Well, the conflict would be where you have 02:14
simultaneous switching. 02:14
Q. So, for example, if one DQS is driven high 02:14
while the other is driving -- driven low and there's 02:15
some overlap in those time periods, that could be a 02:15
problem? 02:15
A. It could. You could end up with -- 02:15
Q. That -- go ahead. 02:15
A. Yes, you could end up with an 02:15
indeterminate value. 02:15
Q. And that could also cause a DQS burn, bus 02:15
burn, situation? 02:15
A. DQS bus? 02:15
Q. Basically like a DQS bus conflict 02:15
situation. 02:15
A. Yes, it could be a conflict. 02:15
Q. And can you take a look at Figures 3 and 4 02:15
of the '668. 02:15
A. Yes. 02:16
Q. Okay. So shown in Figure 4, is that a 02:16
solution to address the potential DQS bus conflict 02:16
by using current-limiting resistors? 02:16
A. My understanding is that it could prevent 02:16
permanent damage to the device, but it would not 02:16
ensure operation in the back-to-back read situation 02:16

that was of concern. 02:16

Q. So the solution would prevent damage to 02:17

the DQS bus, correct? 02:17

A. I haven't done analysis to figure out 02:17

whether or not it's effective, but that's what it's 02:17

purported to do, and it's quite plausible that it 02:17

would do that. 02:17

Q. Okay. But you say it would not ensure 02:17

operation in the back-to-back read situation. So 02:17

what do you mean by that? 02:17

A. In the situation that I describe in my 02:17

declaration where a burst is -- involves one rank, 02:17

and immediately a subsequent burst goes to a second 02:17

rank, there would still be a signal conflict in 02:17

which the value of the signal, the voltage of the 02:17

signal, would not be at an appropriate level for 02:17

proper operation. 02:17

Q. And in Figures 1 and 2, if one DQS is 02:18

driven high while the other is driven low at the 02:18

same time, that would also cause a similar situation 02:18

as in the back-to-back read scenario you're 02:18

concerned with, correct? 02:18

A. There would be similarities and 02:18

differences. The similarity would be that there 02:18

would be an electrical conflict. The difference is 02:18

that in this situation there's no explanation that 02:18
it's important to maintain the pulse timing and to 02:18
not have out of spec voltages on the line. 02:18
So there are physical similarities but 02:18
there are operational differences. 02:19
Q. So the main difference is more a timing 02:19
issue? So for Figures 1 and 2, timing is less of a 02:19
concern, while for the back-to-back read operation 02:19
the timing of the DQS pulses are more important? 02:19
Is that what you're saying? 02:19
A. Somebody might describe it that way. Or 02:19
it might also be useful to describe it as in the 02:19
Exhibit 1006, the presence of an intermediate 02:19
voltage is not important at the time that it occurs, 02:19
where in rank multiplication using DDR or DDR2 DIMMs 02:19
an intermediate voltage as would occur in 02:19
Exhibit 1006 is unacceptable. 02:20
Q. Okay. So it is more a signaling level 02:20
issue at the particular time; is that correct? 02:20
A. It is a signaling level at a particular 02:20
time. 02:20
Now, there is also a concern about 02:20
physical damage, but 1006 mitigates the physical 02:20
damage issue. 02:20
Q. Okay. So 1006 does involve the physical 02:20

damages issue? 02:20

A. It appears to. It appears to, but it does 02:20

not maintain proper operation. 02:20

Q. Okay. So the concern now is whether the 02:20

proper voltage level is provided at the right time 02:20

in order for you to have the right alignment between 02:20

the DQS and DQ. Does that sound correct? 02:21

A. That is generally the problem, yes. 02:21

Q. Dr. Wolfe, can you please refresh your 02:21

Exhibit Share and see whether you see an 02:21

Exhibit 2101. And that is Provisional Application 02:21

60/590038. 02:22

(Exhibit 2101 was marked for 02:22

identification and attached 02:22

hereto.) 02:22

THE WITNESS: Okay. I have that. 02:22

BY MS. ZHONG: 02:22

Q. Can you open it? 02:22

A. I did. 02:22

Q. Okay. Can you please take a look at 02:22

Figures 1 and 2 of this exhibit, Exhibit 2101? 02:22

MR. CHANDLER: And let me just lodge an 02:22

objection as to relevance. I don't think we've seen 02:22

this exhibit. And perhaps you can explain the 02:22

relevance to anything that was in Dr. Wolfe's direct 02:22

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1 testimony or the '912 patent. But I'm not sure it's 02:22
2 relevant. 02:22
3 MS. ZHONG: You don't think -- you don't 02:22
4 think the priority document 4436 is relevant? 02:22
5 MR. CHANDLER: Well, that's -- I 02:23
6 apologize. I haven't memorized all the provisional 02:23
7 application numbers. So it would be helpful to tie 02:23
8 this provisional to whatever it was we were talking 02:23
9 about. 02:23
10 BY MS. ZHONG: 02:23
11 Q. Dr. Wolfe, can you please take a look at 02:23
12 Figures 1 and 2 of this document? 02:23
13 A. I see them. 02:23
14 MR. CHANDLER: And so then I'll just go on 02:23
15 with the objection. 02:23
16 I mean, if it's not tied to something in 02:23
17 his report, I'd object to outside the scope. And 02:23
18 also we'd have issues of authenticity and hearsay. 02:23
19 MS. ZHONG: You can object to the board 02:23
20 and see what the board says. 02:23
21 Q. So for these two Figures 1 and 2, does -- 02:23
22 do Figures 1 and 2 also offer solutions to the DQS 02:23
23 bus conflict issue? 02:24
24 A. I haven't really spent time studying that 02:24
25 aspect of this. I'm not sure if I've seen this 02:24

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before. 02:24
Q. Okay. 02:24
A. They appear to deal with issues related to 02:24
termination impedence, which would be a different 02:24
problem than the one that I was talking about 02:24
before. 02:24
Q. Okay. But it would at least prevent 02:24
damages to the device, correct? 02:24
A. Not necessarily. I think it's supposed to 02:24
impact signal reflections. 02:24
Q. What do you mean by signal reflections? 02:24
A. High-speed signals can have what are 02:24
called termination networks to prevent the signal 02:24
from reflecting, from bouncing back when it gets to 02:25
the end of a wire. And that seems to be the subject 02:25
matter here. 02:25
Q. And what's the problem associated with 02:25
signal bouncing? 02:25
A. There can be numerous problems. But the 02:25
primary one is that it would inject noise into the 02:25
signal, which would cause erroneous data to be 02:25
communicated. 02:25
The paragraph -- 02:25
Q. Okay. 02:25
A. -- at the end talks about the signal 02:25

reflection problem. 02:25

Q. Okay. So basically one issue associated 02:25

with signal reflection is incorrect voltage levels 02:25

would show up and, therefore, cause data errors; is 02:25

that correct? 02:26

A. Yes. If you have an improperly terminated 02:26

high-speed signal, the reflections can cause 02:26

transient voltage deviations, which could cause data 02:26

communication errors. 02:26

Q. Do you have any evidence that the solution 02:26

offered here would not work with remedial of the 02:26

signal reflection errors that we just discussed? 02:26

A. I don't know one way or another. It's a 02:26

quantitative analysis and I haven't done it. 02:26

Q. And you have not considered this document 02:26

in particular; fair? 02:26

A. I did not consider this document, as far 02:27

as I can recall. It does not seem to deal with the 02:27

issues related to my declaration. 02:27

Q. Okay. Can you please take a look at the 02:27

'436 patent, and the cover page in particular. 02:27

A. That's Exhibit 1009? 02:27

Q. Correct. Exhibit 1009, cover page. 02:27

A. Yes. 02:27

Q. And '436 claimed priority to Provisional 02:27

Application 60/590038, correct? 02:27
A. Correct. 02:27
Q. And that is Exhibit Number 2101, correct? 02:28
MR. CHANDLER: Objection. Lack of 02:28
foundation. 02:28
THE WITNESS: I don't know how to find the 02:28
provisional number on Exhibit 2101. 02:28
BY MS. ZHONG: 02:28
Q. So I direct your attention to the cover 02:28
page of Exhibit 2101. Are you there? 02:28
A. Yes. 02:28
Q. Do you see barcode on the right -- top 02:28
right-hand corner? 02:28
A. Yes. 02:28
Q. And do you see next to the barcode there 02:28
is a series of numbers, 60/590038? 02:28
A. I see that. 02:29
Q. That number matches up with the number 02:29
that's beside it on the cover page of the 02:29
'436 patent, correct? 02:29
A. It does. 02:29
Q. Okay. And if you can go to column 1 of 02:29
the '436 patent. 02:29
A. Okay. 02:29
Q. In the field with the title "Claim of 02:29

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Priority," it says that this particular provisional 02:29
application 6590038 is incorporated in its entirety 02:29
by reference herein, correct? 02:29
A. It does. 02:29
Q. So the description in 6590038 is part of 02:29
the '436 patent? 02:29
A. I'm not an attorney, but that would be my 02:30
understanding. 02:30
MS. ZHONG: Let's take a 10-minute break. 02:30
MR. CHANDLER: Okay. 02:30
(Recess.) 02:30
(Off record: 2:31 p.m.) 02:30
(On record: 2:46 p.m.) 02:30
BY MS. ZHONG: 02:30
Q. Dr. Wolfe, do you have Exhibit 1009, the 02:46
'436 patent, with you? 02:46
A. Yes. 02:46
Q. Can you please go to PDF page 13, Figure 02:46
11A and 11B. 02:46
A. Yes. 02:46
Q. So 11A depicts to a person of ordinary 02:46
skill in the art a situation called rent 02:46
multiplication? 02:46
MR. CHANDLER: Objection to form. 02:47
THE WITNESS: I think -- I think a person 02:47

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of ordinary skill in the art might characterize that 02:47
as rank multiplication, yes. 02:47
BY MS. ZHONG: 02:47
Q. And if take a look at Exhibit 11B {sic}, 02:47
do you see that on the right-hand side, there are 02:47
four signals: CAS0a, CAS0b, CAS1a, and -- 02:47
THE REPORTER: I'm sorry, Counsel, you 02:47
were cut off. 02:47
BY MS. ZHONG: 02:47
Q. -- four signals: CAS0a, CAS0b, CAS1a, and 02:47
CAS1b? Do you see that, Dr. Wolfe? 02:47
A. Yes. 02:47
Q. Those are the four chip select signals for 02:47
each of the ranks depicted in Figure 11A; is that 02:47
correct? 02:48
MR. CHANDLER: Objection. Form. 02:48
BY MS. ZHONG: 02:48
Q. Dr. Wolfe? 02:48
A. Yeah, I'm looking at some details to give 02:48
you a precise answer. 02:48
There's an example given with respect to 02:48
Figure 11A in which that can be a four-rank system. 02:48
And in that case, in that one particular example 02:49
that's related to Figure 11A, then the four CAS 02:49
signals coming out of element 640 would represent 02:49

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select signals for each of the four ranks. 02:49

Q. Okay. And the four CAS signals that's 02:49

coming out of 640 are based on input signals to the 02:49

left of the box 640; is that correct? 02:49

A. It's based on a subset of those input 02:49

signals. It's not completely clear what. But the 02:49

suggestion would be that, for example, it might be 02:49

similar to what's in Figure 10 where it's only the 02:49

address signal that actually participates. 02:50

Q. The input signal to 640 includes BNK0, 02:50

BNK1, RAS/CAS/WE, CS0, CS1 and A13; is that correct? 02:50

MR. CHANDLER: Objection. Form. 02:50

THE WITNESS: Those are all connected to 02:50

640. There's no description as to whether or not 02:50

they are actually used by 640. 02:50

BY MS. ZHONG: 02:50

Q. So the signals I just listed, BNK0, BNK1, 02:50

RAS/CAS/WE, CS0, CS1 and A13, are all input signals 02:50

to 640, correct? 02:51

MR. CHANDLER: Object. Form. 02:51

THE WITNESS: Again, it depends how you 02:51

define an input signal. They're all connected to 02:51

640, but there's no teaching as to whether or not 02:51

they're used as inputs. 02:51

BY MS. ZHONG: 02:51

Q. And the output from 640 are the four CAS 02:51
signals on the left, correct? On the right, sorry. 02:51
So the output from 640 are the four CAS 02:51
signals on the right, correct? 02:51
A. Correct. 02:51
Q. What is A13? 02:51
A. What is A13? Is that the question? 02:51
Q. Yes. 02:51
A. I believe it's one of the address bits. 02:51
Q. So it's either a row or a column that 02:52
addresses it? 02:52
MR. CHANDLER: Objection. Form. 02:52
And I didn't hear the question at the 02:52
beginning. 02:52
BY MS. ZHONG: 02:52
Q. It is either a row or a column address it? 02:52
Is that correct, Dr. Wolfe? 02:52
A. Yes, or depending on the particular DRAM 02:52
generation. It could be both. 02:52
Q. So it is a row, column, or both a row and 02:52
column address it? 02:52
A. That would be my understanding of what's 02:52
intended. 02:52
Q. And what is CS0 and CS1? 02:52
A. Those would be DIMM level chip selects. 02:53

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Q. And BNK1 and BNK0? 02:53

A. Those appear to be the pass-through bank 02:53
selects to -- to the individual DRAM chips. 02:53

I need to -- I need to clarify my previous 02:53
answer. 02:53

So the outputs are not actually chip 02:53
selects. They are gated column address select 02:53
signals. 02:53

Q. Okay. But they are sent to each of the 02:53
corresponding memory mod- -- corresponding rank; is 02:53
that correct? 02:53

A. Correct, as gated column address signals. 02:53
The chip selects are separate. They are shown up in 02:53
Figure 11A. 02:54

Q. So if you look at column 17, starting from 02:54
line 66 to column 18, line 2, the enabled CAS signal 02:54
that's being outputted from 640 is able to select 02:55
which of the four ranks, 620, 625, 630 and 635, as 02:55
active; is that correct? 02:55

A. Yes, in that embodiment for certain 02:55
operations, that's true. 02:55

Q. Okay. So basically it is used -- it has a 02:55
similar function as a chip select signal, which is 02:55
to decide which of the rank will be activated and 02:55
chosen; is that correct? 02:55

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MR. CHANDLER: Objection. 02:55

THE WITNESS: Not really. A chip select 02:55

signal determines whether or not to pay attention to 02:55

the command in a DDR environment. So it has a -- it 02:56

has a different scope. And that's why the chip 02:56

select signals are also provided to the various 02:56

ranks. 02:56

BY MS. ZHONG: 02:56

Q. And if you look at column 18, lines 3 02:56

through 11, it says that the PLD 642 can also 02:56

generate gated chip select signals instead of gated 02:56

CAS signals; is that correct? 02:57

A. It does say that. 02:57

Q. What is your understanding of what a rank 02:57

is? 02:57

A. In what context? 02:57

Q. A rank of memory module -- sorry. Let me 02:58

withdraw. 02:58

In the context of a '912, what is a rank? 02:58

A. I think it would be an independent set of 02:58

one or more memory devices on a memory module that 02:58

act together in response to command signals, 02:58

including chip select signals, to read or write the 02:58

full bit width of the memory module. 02:58

Q. Okay. How can a single memory device act 02:58

1 together? 02:58
2 A. It acts consistently. 02:58
3 Again, that's just an artifact of English 02:58
4 when we say one or more. If I -- you know, just 02:58
5 like if I said one or more children jumping up and 02:58
6 down together, that would make sense in English even 02:58
7 though if it's one, they are just jumping up and 02:59
8 down. 02:59
9 So the word "together," I guess, is only 02:59
10 important if there's more than one. But -- but if 02:59
11 there's one, then it simply needs to act. 02:59
12 Q. You mentioned earlier that there are x8 02:59
13 memory modules. Do you recall that testimony? 02:59
14 A. I do. 02:59
15 Q. Are those DDR memory modules? 02:59
16 A. The ones that I'm thinking of are not DDR, 02:59
17 but I don't know of any reason why you can't build a 02:59
18 x8 DDR memory module. 02:59
19 Q. For JEDEC compliant memory modules, are 02:59
20 you aware of any x8 DDR memory modules? 03:00
21 A. Well, it certainly would be compliant with 03:00
22 Exhibit 1029. I don't know whether or not there's a 03:00
23 form factor definition for a DDR2x8 memory module. 03:00
24 Q. Are you aware of any x8 DDR2 memory 03:00
25 modules that's JEDEC compliant, JEDEC standard 03:00

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compliant? 03:00
A. Like I said, they would be standard with 03:00
certain JEDEC protocols like 79-2. But I don't know 03:00
whether or not there's a separate JEDEC protocol for 03:00
the form factor of a x8 DDR2 memory module. 03:00
Q. When you say a form factor x8, what do you 03:00
mean? 03:00
A. Well, when you have a specification in 03:00
JEDEC for a memory module, there's portions that 03:01
describe how it should operate. And then there's 03:01
other portions that describe its physical 03:01
characteristics. 03:01
If we were to look, for example, at 03:01
Exhibit 1032, large portions of that specification 03:01
have to do with physical characteristics: The 03:01
dimensions of the card, the placement of the chips, 03:01
the physical order of the pins. 03:01
And I just don't know one way or another 03:01
whether or not that specification exists for the 03:01
combination of -- of x8 memory module and DDR2. But 03:01
I certainly know that based on Exhibit 1029, 03:01
somebody could build a DDR2 8-bit-wide memory 03:01
module. 03:01
Q. I'm asking a different question. 03:02
Are you aware of any JEDEC memory module 03:02

1 standards that specify a x8 or x16 memory module? 03:02
2 A. I don't think that that's a simple 03:02
3 question. There are many JEDEC standards. I am 03:02
4 aware of standards like Exhibit 1029 that would tell 03:02
5 you the operational characteristics, many of the 03:02
6 operational characteristics, of a x16 or x8 memory 03:02
7 module for DDR2. 03:02
8 I do not know whether or not the remaining 03:02
9 characteristics, such as the physical dimensions or 03:02
10 the power consumption specifications, are part of 03:02
11 another JEDEC specification or not. 03:02
12 Q. So you did not cite any single JEDEC 03:03
13 specification or document that showed the use of a 03:03
14 x8 DDR or DDR2 memory module; is that correct? 03:03
15 Other than Perego. 03:03
16 A. As I said, many of the characteristics, 03:03
17 enough to allow one to build such a module, are in 03:03
18 Exhibit 1029. But I did not specify -- I did not 03:03
19 cite to a JEDEC standard document that provides the 03:03
20 physical characteristics of such a module. 03:03
21 Q. Are you even aware of any memory modules 03:03
22 with -- let me withdraw and ask. 03:04
23 Are you aware of any DDR2 memory modules 03:04
24 with a x8 or x16 memory module bit width other than 03:04
25 what's described in Perego? 03:04

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A. Can I have the question one more time? 03:04
Q. Are you aware of any DDR2 memory modules 03:04
with a memory bit width of x16 or x8 other than 03:04
what's described in Perego? 03:04
A. I can't identify one with specificity, but 03:04
it would not surprise me at all if I could find one. 03:04
Q. Have you used one with a x8 memory -- 03:05
x8 bit width with a JEDEC compliant DDR2 device on 03:05
it? 03:05
A. Not that I can recall. 03:05
Q. Okay. Have you ever used a memory module 03:05
with a bit width of x16 that includes a JEDEC 03:05
compliant DDR2 device on it? 03:05
A. No, I don't recall ever having used that 03:05
particular combination. I have used DDR2 memory 03:05
modules and I have used x16 memory modules, but I 03:05
don't recall having used those two together 03:05
personally. 03:05
Q. When you say you have used x16 memory 03:05
modules, what kind of DRAM devices are on the memory 03:05
module? 03:06
A. I don't recall specifically. It would 03:06
have been something older than DDR. 03:06
Q. So something like SDRAM? 03:06
A. Like SDRAM or fast page mode, something 03:06

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like that. 03:06

Q. Okay. But you don't recall ever having 03:06

used a memory module with DDR or newer generations 03:06

of DRAMs that's 16 bit wide or below, correct? 03:06

A. I don't personally recall ever having used 03:06

that in a module. But it certainly would be quite 03:06

within ordinary skill levels to design one. 03:06

Q. How long have you been working in the 03:06

memory industry? 03:06

A. It depends what you define as "in the 03:06

memory industry." I have been working with memory 03:07

chips in various ways for almost 40 years. 03:07

Q. Okay. And when was DDR first introduced? 03:07

A. Oh, boy. I don't know. Somewhere around 03:07

2002. 03:07

Q. DDR or DDR2? 03:07

A. I believe -- let me see if I have 03:07

something that can refresh my memory here. 03:07

Maybe a little bit earlier. It became 03:07

popular around 2002, but it may have been available 03:07

a year or two earlier than that. 03:07

Q. Okay. So DDR has been available for at 03:07

least 20 years? 03:07

A. Yes. 03:07

Q. Okay. And in those 20-plus years, you 03:07

1 don't recall ever having used a memory module that's 03:07
2 16 bit wide or lower and have DDR or newer 03:08
3 generations of JEDEC compliant memory devices on 03:08
4 them; is that correct? 03:08
5 A. That's correct. I don't personally recall 03:08
6 using one of those. 03:08
7 Q. Do you recall such a memory module 03:08
8 described anywhere? 03:08
9 A. Well, I think a person of ordinary skill 03:08
10 would understand it from Exhibit 1029. 03:08
11 Q. I'm asking a different question. 03:08
12 You review journal articles, correct? 03:08
13 A. Yes. 03:08
14 Q. You read journal articles. Are you -- do 03:08
15 you recall any journal articles describing a memory 03:09
16 module with DDR or newer generations of the SDRAM 03:09
17 that is 16 bits wide and lower? 03:09
18 A. Not that I can give you off the top of my 03:09
19 head. It would have been such an ordinary thing 03:09
20 that it wouldn't have been something that I would 03:09
21 specifically remember. 03:09
22 Q. The answer is that you don't recall any 03:09
23 single reference? 03:09
24 A. No. I mean that's just a detail that I 03:09
25 don't recall whether or not I've specifically seen 03:09

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that combination. 03:09

Q. Do you recall seeing combinations of 03:09

x64-bit-wide memory modules with DDR or newer 03:09

generations of DRAM devices on them? 03:09

A. Yes. 03:09

Q. Well, if that's such a trivial detail, why 03:09

did you recall that? 03:10

A. Because it happens to be what's in the 03:10

computer that's sitting on my desk. 03:10

Q. So x64 is the most common -- the commonly 03:10

used bit width for memory modules; is that correct? 03:10

A. Or desktop personal computers, that is the 03:10

case. 03:10

Q. When is x8 or x16 bit-wide memory modules 03:10

used, in what applications? 03:10

A. Generally when you wanted a system to be 03:10

very small. So, you know, in industrial 03:10

applications or portable applications or small 03:11

devices would be the most common usage today. 03:11

Historically it was used when memory chips 03:11

were larger and you could only fit a small number of 03:11

them on a DIMM. 03:11

Q. When you say industrial applications, what 03:11

do you have in mind? 03:11

A. If you are building a factory control or 03:11

PC or an automotive application, something where 03:11
you're very constrained in terms of power and size 03:11
and you want it to be very efficient, or you may 03:11
want to use a relatively small amount of memory, it 03:11
would be common to use a narrower memory module. 03:11
Q. And when you say portable applications, 03:11
what do you refer to? 03:12
A. Any small handheld device, some type of a 03:12
hand-carried sensor or, you know, a measurement 03:12
instrument, those kinds of things. 03:12
Q. Okay. But not in PCs or server systems; 03:12
is that correct? 03:12
A. They're not used today in the PCs or 03:12
servers that I'm familiar with. 03:12
Q. And they haven't been used since the late 03:12
1990s, correct? 03:12
A. I don't know. I know that that's the last 03:12
time I'm personally familiar with them being used. 03:12
But as I said, these technologies often linger for a 03:12
long time. 03:12
Q. And in 2004 and 2005, the PC systems used 03:12
x64 bit-wide bus, correct? 03:13
A. Desktop PCs generally did. 03:13
Q. What about servers? 03:13
A. They would generally use a 72. Or I think 03:13

there might have been some 144-wide modules. But 03:13
again, there's variations throughout the industry. 03:13
THE REPORTER: Counsel, I need to go off 03:13
the record and reboot my system. So how about five 03:13
minutes; is that okay? 03:13
MS. ZHONG: So why don't we take a break 03:14
now so you can reboot your system. 03:14
(Recess.) 03:14
(Off record: 3:14 p.m.) 03:14
(On record: 3:34 p.m.) 03:14
MS. ZHONG: Let's go back on the record. 03:33
Q. Dr. Wolfe, do you have '912 patent, 03:33
Exhibit 1001 with you? 03:33
A. Yes. 03:34
(Exhibit 1001 was marked for 03:34
identification and attached 03:34
hereto.) 03:34
BY MS. ZHONG: 03:34
Q. Can you turn to Claim number 16? I 03:34
believe it's Exhibit Number 44. 03:34
A. Again, if you don't mind, can I look at it 03:34
in my declaration where it's a little bit easier to 03:34
read? 03:34
Q. Sure. Where are you looking? 03:34
A. Pages 31 and 32. 03:34

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THE REPORTER: What exhibit number, 03:34
please, for the record? 03:34
THE WITNESS: 1003. 03:34
THE REPORTER: Thank you. 03:34
BY MS. ZHONG: 03:34
Q. Can you take a look at Element 16.c.iii on 03:34
page 31. 03:34
A. Okay. 03:34
Q. Do you see the limitation, "The circuit 03:34
generating a set of output signals in response to 03:34
the set of input signals"? Do you see that 03:35
limitation? 03:35
A. Yes. 03:35
Q. And the set of input signals would include 03:35
at least one row column address signal, bank address 03:35
signals, and at least one chip select signals, 03:35
correct? 03:35
A. Correct. 03:35
Q. Okay. And what's your interpretation of 03:35
generating a set of output signals in response to 03:35
the set of input signals? 03:35
A. The -- 03:35
Q. Let me ask you. Does the output signal 03:35
need to be generated using every single one of the 03:35
row/column address signals, bank address signals, 03:35

1 and one chip select signal that's recited in 16.c.i? 03:35
2 A. I've analyzed it both ways in my 03:36
3 declaration. But my understanding is that, based on 03:36
4 the prosecution history, that is a requirement here 03:36
5 because in order to obtain allowance it was argued 03:36
6 that that was a requirement. 03:36
7 Q. Can you point me to where it's argued in 03:36
8 the prosecution history that's a requirement? 03:36
9 A. I believe it's in my report -- let me see 03:36
10 if I can find where. 03:36
11 If you look at page 26 of my declaration, 03:37
12 Exhibit 1003, there's a citation of the comments 03:37
13 that were made to the examiner. Well, in this case 03:37
14 it's the examiner's response to those comments. 03:37
15 There may be others as well. And it also continues 03:37
16 to paragraph 63. 03:38
17 Q. Okay. But basically on page 26 and 27 03:38
18 that's where you laid out your interpretation in 03:39
19 response to? 03:39
20 A. Yes. And, of course, this is not my 03:39
21 decision. This is a decision that the board will 03:39
22 have to make as a matter of law. And they've 03:39
23 analyzed it under both assumptions. 03:39
24 Q. And I'm asking you how would a person of 03:39
25 ordinary skill in the art understand? 03:39

A. I think a person of ordinary skill in the 03:39
art, based on the prosecution history as intrinsic 03:39
evidence, would understand that this claim has been 03:39
limited to a logic element that generates chip 03:39
select signals in response to all four of the 03:39
enumerated signals in Claim 1 or in this Claim 16. 03:39
Q. Where does the PLL clock signal come from? 03:39
A. Where does the PLL clock signal in the 03:40
claim come from? 03:40
Q. Yeah. 03:40
MR. CHANDLER: Objection. Form. It's -- 03:40
BY MS. ZHONG: 03:40
Q. Does Claim 16 even recite a clock signal? 03:40
A. It does not. It claims a -- a connection 03:40
between the phase locked loop and the DDR memory 03:40
device, the logic element and the register. So -- 03:40
Q. So -- 03:40
A. But certainly in the case of Claim 16, I 03:40
think that one would have to reasonably understand 03:40
the arguments to the examiner to be that the signal 03:40
must be -- the output signal must be generated in 03:40
response to the enumerated input signals in 16.c.i. 03:40
Q. And what's the indication in '436 that 03:41
those signals are not used? 03:41
A. I think the real question is what's the 03:41

indication that those signals are used? There would 03:41
be no need to use them. 03:41
If you read through the patent and look at 03:41
the teachings of Figure 10, for example, you can see 03:41
that A13 is sufficient to generate the signals that 03:41
are needed, or that A12 and A13 are, or that some 03:41
subset is. 03:42
It's not necessary to use bank address 03:42
signals. There's no reference to using the bank 03:42
address signals. They are separately provided to 03:42
all of the ranks. So there's just simply no reason 03:42
to conclude that there's any teaching that each of 03:42
the signals is used. It would be speculation. 03:42
Q. You didn't really answer my question. 03:42
What's the indication that they would not 03:42
be used? 03:42
A. I didn't look because I don't think that 03:42
that's the requirement for priority date. The 03:42
question is -- 03:43
Q. It's not -- it's not really what you 03:43
believe is a requirement. Just answer my question. 03:43
A. That's not the analysis that I did. 03:43
Q. I'm not here to -- okay. 03:43
Can you call up Ellsberry, which is 03:43
Exhibit 1035? 03:43

A. I'm sorry, did you ask me to look at 03:43
Exhibit 1035? 03:43
Q. No, 1037. Ellsberry. 03:43
A. Okay. 03:43
(Exhibit 1037 was marked for 03:43
identification and attached 03:43
hereto.) 03:43
BY MS. ZHONG: 03:43
Q. Ellsberry deals with JEDEC compliant 03:43
memory modules; is that correct? 03:43
A. That's certainly within the scope of 03:43
Ellsberry, yes. 03:43
Q. And I think we discussed in last session 03:44
that you are not aware of any x8 memory modules 03:44
using JEDEC compliant DDR2 or DDR devices, correct? 03:44
A. I'm not personally aware of one, no. But, 03:44
you know, I'll stick with my previous answers as to 03:44
how a person of ordinary skill would understand that 03:44
from the JEDEC specification. 03:44
Q. And I think you also said that you are 03:44
not -- you cannot recall any journal papers that 03:44
describes x8 memory modules using JEDEC compliant 03:44
DDR2 or DDR devices, correct? 03:44
A. I can't recall one that specifically says 03:44
that off the top of my head. 03:44

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Q. Okay. And you have been in the memory 03:44
industry for 40 years? 03:45
A. I've been using memory devices and 03:45
designing products that interact with memory devices 03:45
for 40 years. 03:45
Q. And you have been familiar with the DDR -- 03:45
the JEDEC standards for DDR2 and DDR for over 03:45
20 years? 03:45
A. With respect to JESD79 and 79-2, that is 03:45
correct. 03:45
Q. Are you aware of any other JEDEC standards 03:45
for DDR or DDR2 devices? 03:45
A. I believe there are other ones. They have 03:45
to do with other aspects other than the functional 03:45
characteristics. And then there are all kinds of 03:45
variations of DDR and DDR2 devices that are -- that 03:46
are in separate standards as well. 03:46
Q. And you did not cite any of those, 03:46
correct? 03:46
A. Correct. It wasn't necessary. 03:46
Q. Okay. Can you take a look at Figure 2 of 03:46
Ellsberry? 03:46
A. Figure 2 of Ellsberry? 03:46
Q. Correct. 03:46
A. Yes. 03:46

Q. In Figure 2 of Ellsberry, there are more 03:46
than one DRAM devices per rank, correct? 03:46
A. Not necessarily. If you read Ellsberry, 03:47
it indicates that -- that Figure 2 is designed to 03:47
illustrate one or more Switch ASICs with DRAMs 03:47
attached to it. So literally the illustration here 03:47
is of more than one. But if you read it in the 03:47
context of the text, it's intended to communicate 03:47
one or more. 03:47
Q. As shown in Figure 2, it's intended to 03:47
show N DRAM devices per rank, correct? 03:47
A. No. It's actually N plus 1. But if you 03:47
read it in the context of the specification, it 03:47
indicates that N plus 1 is one or more. 03:47
Q. Okay. And in Figure 2 as drawn here, it's 03:48
intended to show there are N plus 1 memory devices 03:48
per rank, correct? 03:48
A. No. It is intended to show that there can 03:48
be N plus 1. But as I said, if you read it in the 03:48
context of the specification, it's clear that this 03:48
is intended to refer to one or more switch ASICs 03:48
connected to one or more sets of memory. 03:48
Q. I'm talking about what's literally drawn 03:48
here. Can you answer the question? 03:48
A. I think I did answer the question. 03:48

There are -- there are clearly a variety 03:48
of options drawn here, but there's also text that 03:48
describes this drawing. And if you'll read the text 03:48
and understand this drawing in the context of its 03:48
description and specification, it is one or more 03:49
switch ASICs. 03:49
Q. Can you tell me where it says it's one or 03:49
more? 03:49
A. Yeah. So there's some places -- let's 03:49
see. I can certainly find some of them. 03:49
If you look at paragraph 28 -- 03:49
Q. Okay. 03:49
A. -- which is where Figure 2 begins its 03:49
description. 03:49
Q. Okay. 03:49
A. And the last sentence it says, "The 03:49
capacity-expanding feature of the invention is 03:49
accomplished by a combination of a control unit 204 03:49
and one or more memory bank switches, 206 and 208." 03:49
There are other places as well. Did you 03:49
want me to find them all? 03:49
Q. Well, it says memory banks 206 and 208. 03:49
That means two, correct? 03:50
A. No. I think the proper reading, 03:50
especially if you read it in the context of 03:50

1 everything else, for example, paragraph 26 where it 03:50
2 says, "The invention permits two separate SRAM DDR 03:50
3 devices to appear as a single higher-capacity SDRAM 03:50
4 DDR device to a source device," that indicates that 03:50
5 there can be only two devices. And it can appear as 03:50
6 one device. So that would be a one-switch 03:50
7 situation. 03:50
8 There are other examples in paragraph 31 03:50
9 through 33 where it's clear that, if you read that, 03:50
10 it's possible to only have data written to memory 03:50
11 bank 212 and not 226. So, again, that would be a 03:50
12 configuration -- 03:50
13 Q. That's all right. I was disconnected 03:51
14 audio -- from the audio, so I couldn't hear what you 03:51
15 said. 03:51
16 THE REPORTER: And, Counsel, I'm having 03:51
17 trouble with my audio on this end, too. I don't 03:51
18 know whether it's the Internet feed or exactly what 03:51
19 it is. 03:51
20 MR. CHANDLER: I heard it fine. I haven't 03:51
21 had any problems. I heard all three of you just 03:51
22 fine just now, so for what it's worth. 03:51
23 MS. ZHONG: I was disconnected for five 03:51
24 minutes, so at least while he was answering. So do 03:51
25 you mind repeat your answer? 03:51

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MR. CHANDLER: Well, I mean, if Dr. Wolfe 03:51
doesn't have the realtime and the court reporter 03:51
does, maybe the court reporter can just read it. Is 03:51
that possible? 03:51
(Off the record discussion.) 03:52
BY MS. ZHONG: 03:52
Q. So paragraph 28 states that its memory 03:52
bank 206 and 208. And that would mean two banks, 03:52
correct? 03:52
A. I don't believe so. I think that it's 03:52
simply referring you to the fact that you only need 03:52
one or more switches. 206 and 208 are both 03:52
candidates to be one or more. 03:52
If I read that in the context of 03:52
paragraphs 26 or in the context of paragraphs 31 03:52
through 33, in the context of -- for example -- 03:53
let's see. 03:53
I think paragraph 34, paragraph 46, there 03:53
are a number of indications that you don't need 03:53
multiple switches, that you can have only a single 03:53
switch embodiment, and that you can have as few as 03:53
two devices which appear as one. 03:53
Q. Now, each of the switch ASIC has four 03:53
banks connected to it, correct? 03:53
A. There are four banks illustrated in Figure 03:53

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2, although, again, in the text, there are 03:53
indications that one could also have a two-bank 03:53
variation as well. 03:53
Q. What is a bank? 03:53
So let me ask, when it comes to Ellsberry, 03:54
what is Bank 0 to Bank 3? Is it internal memory 03:54
organization or something else? 03:54
A. No, those would be what we would today 03:54
call banks. 03:54
Q. And when Ellsberry activates a bank, how 03:54
does it do that? 03:54
MR. CHANDLER: Objection. Form. 03:54
THE WITNESS: Well, I mean, that's 03:55
described with some detail in the specification. It 03:55
has multiple embodiments. And if one looks at, for 03:55
example, Figure 8A, you can see that in the row/Bank 03:55
mode, a bank is activated in one of two phases, 03:55
either Phase A or Phase B of a read or write 03:55
operation -- I'm sorry -- an activated operation by 03:55
sending an activate command to either Bank A or Bank 03:55
B. 03:55
BY MS. ZHONG: 03:55
Q. Okay. So why don't we take a look at 03:55
Figure 10. Are you referring to the AC -- are you 03:55
referring to the ACA and ACB command? 03:55

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Hello? 03:56
A. Yeah, I'm looking. 03:56
Those are signals, not commands. 03:56
Q. Okay. What's the difference between 03:56
command and signal? 03:56
A. A signal is an electrical value in a wire 03:56
generally in this context, where a command is -- a 03:56
command is more general. It's the communication of 03:56
an action. 03:56
Q. Okay. So the ACA signal that's sent to, 03:56
for example, device 1012 and 1010, is that a signal 03:56
that's activate that particular rank on 1006? 03:57
A. I'm not quite sure how that signal is 03:57
defined in that drawing. Let me see if it says. 03:57
I don't think we're given a definition of 03:57
that particular signal. 03:57
Q. As a person or ordinary skill in the art, 03:58
how would you interpret it? 03:58
A. I don't know whether or not that's 03:58
intended to be the command. 03:58
And, again, when we look at this in the 03:58
context of the DDR specification, the DDR commands 03:58
are well-defined in Exhibit 1029. So we know what 03:58
an activate command, for example, looks like, and 03:58
what particular bits are used. 03:58

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I referred you to it earlier in the 03:58
deposition, but let me see if I can find it again. 03:58
Q. I'm asking in specific about Ellsberry. 03:58
So as a person of ordinary skill in the art, what is 03:58
ACA that's being output from the control unit ASIC 03:58
-- 03:58
(Simultaneous speakers.) 03:58
A. I don't -- 03:59
Q. -- that's being sent to -- 03:59
A. I don't know at the moment -- 03:59
THE REPORTER: I'm sorry, one at a time. 03:59
BY MS. ZHONG: 03:59
Q. So you have no idea what ACA and ACB 03:59
commands mean? 03:59
MR. CHANDLER: Objection. Form. 03:59
THE WITNESS: I don't see them described 03:59
as commands. I don't think Ellsberry specifies 03:59
particularly what that particular signal is used 03:59
for. But this simply explains in Table 8 that the 03:59
commands are sent to the various devices. And in 03:59
the context of DDR, they would be sent in the 03:59
ordinary way. So, for example, an activate command 03:59
is sent using CAS bar and WE bar, and CS bar, and 03:59
RAS bar. 03:59

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BY MS. ZHONG: 03:59

Q. In Table -- in Figure 8A, activate for 03:59

the -- for Bank A, it says sent to DDR A activate 03:59

command. 04:00

A. I don't understand what the question is. 04:00

Q. So are you saying that in the -- in Figure 04:00

8 in the column "Activate," you think those are the 04:00

JEDEC standard command combinations? 04:00

A. In the row that says "Activate" under 04:00

where it says "Row/Bank Mode," I think a person of 04:00

ordinary skill would understand that those could be 04:00

the JEDEC standard activate commands. 04:00

Q. And what does DDR A and DDR B refer to? 04:00

A. I believe it's referring to the DDR on 04:01

Port A and Port B in a two-rank configuration. 04:01

Q. What is a port? 04:01

A. A collection of wires -- or collection of 04:01

pins, maybe. Those can be seen in Figure 10, 11, 04:01

and 12. 04:01

Q. 10, 11 and 12. 04:01

Okay. So let's go to Figure 10. Where is 04:01

a port? 04:01

A. The outputs of the switch ASIC that end in 04:01

A are Port A. That would be the memory devices 04:01

grouped together as 1006. And Port B would be the 04:01

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memory devices grouped together as 1008. 04:01

Q. So the port is on the -- is downstream 04:02

from the ASIC? 04:02

A. No. I would think of the port as being 04:02

the connection to the ASIC. 04:02

Q. So the wire 1016 that's between the 04:02

right-hand side of the switch -- switch ASIC box and 04:02

to the side of DRAM 1012 and 1010, for example, 04:02

that's Port A? 04:02

A. That's a portion of it. That's the data 04:02

bus. And then there are also the strobe shown in 04:02

Figure 10 as well. 04:02

Q. What is the strobe that you are referring 04:03

to? DQS0A and DQS1A? 04:03

A. And DQS1A, yeah. 04:03

Q. Okay. So it's the -- it's the line that's 04:03

connected to the signal DQS1A? 04:03

MR. CHANDLER: Object to form. 04:03

THE WITNESS: And we're starting to get 04:03

into semantics a little bit. But technically the 04:03

port is the connection between the ASIC and the 04:03

outside world. 04:03

So it would be -- Port A would be in the 04:03

switch ASIC. And Figure 10 would be the first four 04:03

elements listed on the top left of the switch ASIC. 04:03

1 And Port B would be the bottom four elements. 04:03
2 BY MS. ZHONG: 04:03
3 Q. Okay. And by the first four elements and 04:03
4 the bottom four elements, you are referring to 04:03
5 the -- so for the -- when you say the first four 04:04
6 elements, you are referring to the four lines 04:04
7 connected between DQA and DRAM 1012, DQS0A, DQA724, 04:04
8 DQS1A and the DRAM group 1006; is that right? 04:04
9 MR. CHANDLER: Object to form. 04:04
10 THE WITNESS: I'm actually referring to 04:04
11 the connections to the ASIC. And although it's 04:04
12 illustrated as four lines, it would be illustrating 04:04
13 10 connections. 04:04
14 BY MS. ZHONG: 04:04
15 Q. Okay. So basically all the connections 04:04
16 that's between the output of the ASIC switch and the 04:04
17 input of the DRAM boot; is that right? 04:04
18 MR. CHANDLER: Objection. Form. 04:04
19 THE WITNESS: Yes, in this particular case 04:04
20 it would be the -- the connections denoted by 1016 04:04
21 connecting to the DRAM group 1006. 04:05
22 BY MS. ZHONG: 04:05
23 Q. Okay. And then for Port B, that will be 04:05
24 the -- all the lines that's connecting to the output 04:05
25 of the switch ASIC and group 1008 of the DRAMs; is 04:05

that right? 04:05
MR. CHANDLER: Object to form. 04:05
THE WITNESS: It's not all the lines, but 04:05
it's the four that are named at the bottom -- the 04:05
four sets of lines that are named in the bottom 04:05
right: DQB, DQS0B, and DQS1B. 04:05
BY MS. ZHONG: 04:05
Q. Is it possible for you to mark those lines 04:05
on your local copy and email it to the -- email it 04:05
to your counsel so we can make a record of it? 04:05
A. That's up to counsel. 04:06
Q. I'm requesting you to do that. Can you do 04:06
that? 04:06
Maybe you can first share your screen with 04:06
us. And I just want to make sure that my 04:06
understanding is correct. And if you can point to 04:06
the four lines that we're just discussing. 04:06
Is that possible? Can you do that? 04:06
A. If that's okay with counsel. I think I've 04:06
answered the question already. 04:06
THE WITNESS: But is it okay with you, 04:06
Ted? 04:06
MR. CHANDLER: If you can do it. 04:06
THE WITNESS: Host disabled, participant 04:06
screen sharing, so apparently I cannot. 04:06

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(Off the record discussion.) 04:07
BY MS. ZHONG: 04:07
Q. Okay. So for Port A, can you just 04:07
indicate which four lines you're referring to? 04:07
A. These four here -- oh, sorry. 04:07
Q. Can you just draw a box around them? I 04:07
see the cursor moving. 04:07
A. Let's see. 04:07
Q. I think it's comment. Yep, this one. 04:08
A. That would be Port A. 04:08
Q. Okay. 04:08
MR. CHANDLER: So how are we going to get 04:08
this in the record? 04:08
MS. ZHONG: I can do a screen -- let me do 04:08
this. Let me do a screen capture. 04:08
MR. CHANDLER: So, Annita, you'll do a 04:08
screen capture and upload that as a PDF as an 04:08
exhibit? 04:08
MS. ZHONG: Yeah, let me do that. If it 04:08
allows me to save. Let me see if it allows me to 04:08
pull that thing over. 04:09
Q. Can you refresh your Exhibit Share and see 04:09
whether a PNG file called Exhibit 2102 Capture has 04:09
shown up? 04:10
A. I have that. 04:10

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(Exhibit 2102 was marked for identification and attached hereto.) 04:10

BY MS. ZHONG: 04:10

Q. Okay. Can you take a look at it and see if that reflects what you drew on the screen? 04:10

A. It does. 04:10

Q. So I have a question. Does it include a portion of the ASIC switch or only including the portion that's in the ASIC switch in order to capture the signals that's labeled here? 04:10

A. No. When I would typically talk about a port, I would be talking about the -- the point of interconnection between the ASIC switch and the outside world. 04:10

Q. So it's from the output of the ASIC switch to the outside world? It doesn't include the inside world. 04:10

A. It is the output. I mean, port is from the same root word as portal. It basically means a door. It means the actual point at which you would enter or exit the switch. 04:11

Q. Okay. So port is actually the point of exit from the ASIC to the outside world? 04:11

A. Yes. 04:11

Q. What does it mean by enable or disable a 04:11
port? 04:11
A. Where? 04:11
Q. 1037. Let me see. I believe it's 04:11
paragraph 31. 04:11
So paragraph 31 it talks about, for 04:11
example -- 1, 2, 3, 4 -- from the end of the fifth 04:11
line, if you can read that sentence. 04:11
A. I think in context it means not used. 04:12
There are two ranks here. And what this 04:12
is saying is that in this situation only the rank 04:12
connected to Port B would be used and the rank 04:12
connected to Port A would not be used and would not 04:12
send out commands. 04:12
Q. Okay. But the activation and deactivation 04:12
that's described in 31 is with respect to the memory 04:12
bank; is that right? 04:13
MR. CHANDLER: Object to form. 04:13
THE REPORTER: I'm sorry, respect to the 04:13
what? I'm sorry. 04:13
BY MS. ZHONG: 04:13
Q. Is with respect to the memory bank. 04:13
A. Yes, my understanding that memory bank in 04:13
paragraph 41 is referring to what we would typically 04:13
call a rank today. 04:13

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Q. Okay. And if you can take a look at 04:13
Figure 4 of Exhibit 1037. 04:13
A. Yes. 04:13
Q. Is the description of Figure 4 of 1037, 04:13
especially where Port A and Port B are labeled, 04:13
consistent with the understanding that you just 04:13
described? 04:13
A. Yes. 04:13
MR. CHANDLER: Objection. Form. 04:13
BY MS. ZHONG: 04:13
Q. Okay. So Port A and Port B in each of the 04:13
page refers to the point of exit from the ASIC? 04:14
A. Yes. 04:14
MS. ZHONG: Can we take a break for 04:14
ten minutes? 04:14
MR. CHANDLER: Yes. 04:14
(Recess.) 04:15
(Off record: 4:14 p.m.) 04:15
(On record: 4:29 p.m.) 04:15
BY MS. ZHONG: 04:29
Q. Dr. Wolfe, can you pull up Exhibit 1036, 04:29
which is Amidi? 04:29
A. Okay. 04:29
(Exhibit 1036 was marked for 04:29
identification and attached.) 04:29

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BY MS. ZHONG: 04:29

Q. What is the title of 1036? 04:29

A. Transparent Four Rank Memory Module for 04:29
Standard Two Rank Sub-Systems. 04:29

Q. What does it mean by standard two rank 04:29
subsystems? 04:30

A. I think one of the objectives of Amidi was 04:30
to be able to put four ranks of memory physically 04:30
into a computer that only provided two chip selects 04:30
from the memory controller. 04:30

Q. And if you look at Figure 1 of Amidi, it 04:30
says "Overall Block Diagram of Standard Memory 04:30
Interface." 04:30

Do you see that? 04:30

A. Yes. 04:30

Q. And by "standard," is it referring to 04:30
JEDEC standard? 04:30

A. There were certain JEDEC standards that it 04:30
would have been compliant with, but I think that's 04:31
probably reading too much into the actual 04:31
application. I think when they say "standard" here, 04:31
they just mean common or conventional, well-known. 04:31

Q. And JEDEC compliant memory interface in 04:31
the modules were well-known and common at the time; 04:31
is that correct? 04:31

A. Various kinds of JEDEC standard modules 04:31
were well-known and common at the time. 04:31
In fact, if you actually look at the 04:31
description of Figure 1, it does use the term 04:31
"common" rather than "standard." 04:31
Q. Does Amidi use parallel bus architecture 04:32
as in JEDEC standards or it uses more point-to-point 04:32
architecture as Perego? 04:32
A. Well, remember, Perego discloses both 04:32
point-to-point end buses, but the primary 04:32
embodiments that are described in Amidi are using a 04:32
traditional multidrop bus connection for the data 04:32
lines between the controller and the memories. 04:32
Q. And what's the bit width using Amidi? 04:32
Memory modules. What's the bit width of the memory 04:32
modules using Amidi? 04:33
A. I don't recall every disclosure, but 04:33
certainly the diagrams are, such as Figure 4, are 04:33
directed to a 72-bit example. 04:33
Q. So in Amidi there are more than one memory 04:33
device, correct? 04:33
A. In the embodiment that's illustrated in 04:33
Figure 4, that would be the case. 04:33
Q. Are you aware of any illustrated example 04:33
where only one memory device per rank is shown? 04:34

A. I don't recall a complete example of one 04:34
memory device per rank being shown in Amidi, but the 04:34
teachings would be applicable. 04:34
Q. What is a DIMM? 04:34
A. What is a DIMM, is that the question? 04:34
Q. Correct, yes. 04:34
A. In the context of something like the 04:34
'912 patent, DIMM stands for dual inline memory 04:34
module, which basically means a circuit board with 04:34
connectors on two surfaces where the connectors 04:35
consist of multiple paths that are lined up. 04:35
Q. Using industrial applications with x8 -- 04:35
let me withdraw and ask. 04:35
You mentioned that certain industrial 04:35
application and small portable application might use 04:35
x8 or x16 memory modules. 04:35
Do you recall that discussion? 04:35
A. Yes. 04:35
Q. Are DIMMs used in such applications? 04:35
A. I would expect that it's likely that they 04:35
are, but I don't know for certain. Certainly a 04:35
person of ordinary skill would know how to design 04:36
one. 04:36
Q. I'm sorry, have you seen one being used in 04:36
those applications? 04:36

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A. I've seen DIMMs used in industrial 04:36
computing devices. 04:36
Q. What about are DIMMs used in handheld 04:36
devices? 04:36
A. I've seen DIMMs used in handheld devices. 04:36
Q. DDR2 DIMMs? 04:36
A. I can't say for certain one way or 04:36
another. 04:36
Q. Have you seen x8 DDR2 devices used in 04:36
handheld devices? 04:36
A. Yes. 04:36
Q. DDR2 DIMM x8 bit width for the memory 04:36
module. 04:37
A. What's the question? 04:37
Q. You say you are aware of DDR2 DIMM width 04:37
with x8 bit width memory module being used in 04:37
handheld devices. 04:37
A. No, I am not aware of that in particular, 04:37
but I'm certain that a person of ordinary skill 04:37
could easily build that. 04:37
Q. I'm just asking you. You are not aware of 04:37
any such DIMM modules being built and used in 04:37
handheld devices? 04:37
A. I am not aware of an 8-bit-wide DIMM using 04:37
DDR memory that's been used in a handheld device, 04:37

but that doesn't mean it hasn't happened. 04:37
Q. Okay. And you are not aware of any 04:38
8-bit-wide DIMM module being built and used in 04:38
industrial applications with DDR or DDR2 devices, 04:38
correct? 04:38
A. I'm not aware of a DIMM module being used 04:38
with those specific specifications. 04:38
Q. Are you aware of any 8-bit-wide DIMM 04:38
module being built and used in industrial 04:38
applications with DDR3, DDR4, or DDR 5 devices? 04:38
A. No. I'm aware of memory modules, but they 04:38
are not necessarily DIMMs. 04:38
Q. Okay. What kind of other memory modules 04:38
are there? 04:39
A. There are small form factor memory modules 04:39
where the memory die are placed on printed circuit 04:39
boards. 04:39
Q. Are they SIMMs or do they have another 04:39
name? 04:39
A. No. They have various kinds of names. 04:39
Some of them don't have a name. Some of them would 04:39
be called things like FCBGAs, I believe, where 04:39
they're -- they're printed circuit boards with a 04:39
memory die soldered on top. 04:39
Q. Okay. But you would not call them as 04:39

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DIMMs? 04:39

A. No, I would not call those particular 04:39

devices as DIMMs. I would call them memory modules, 04:39

but not DIMMs. 04:39

Q. Okay. Ellsberry is about 04:40

capacity-expanding memory modules such as DIMMs, 04:40

correct? 04:40

MR. CHANDLER: Objection. Form. 04:40

THE WITNESS: It's one of the motivations 04:40

that's mentioned in -- in Ellsberry is to expand the 04:40

capacity of the computer. 04:40

BY MS. ZHONG: 04:40

Q. Okay. So if you only have a single device 04:40

per rank, how is that going to achieve the bit 04:40

capacity expansion objective of Ellsberry? 04:40

A. Because you could expand from a one-device 04:40

DIMM to a two-device DIMM by having two ranks. 04:40

Q. Why can't you just have those two devices 04:41

in a single rank and expand the bandwidth as -- 04:41

(indiscernible.) 04:41

THE REPORTER: I'm sorry, Counsel. Repeat 04:41

your question. "Two devices in a single"... 04:41

BY MS. ZHONG: 04:41

Q. -- rank and expand the bandwidth as a 04:41

result? 04:41

A. That would require more pins on the memory 04:41
bus. It would require a physical modification to an 04:41
existing computer. 04:41
Q. Can you please take a look at Figure 4 of 04:41
Ellsberry. 04:42
A. Yes. 04:42
Q. In this configuration -- take a look at 04:42
Figure 4, then read paragraph 12 to yourself. 04:42
A. Okay. 04:42
Q. Do you see that in paragraph 12, it says 04:42
in Ellsberry, "The load on the bus is not increased 04:42
because the memory bank switches present a single 04:42
load to the bus." 04:42
Do you see that sentence? It starts with 04:42
"Moreover," the sixth line in paragraph 12. 04:42
A. I don't see that in paragraph 12. 04:43
Q. Ellsberry, paragraph 12, one, two, three, 04:43
four, five -- sixth line. "Moreover, the load on 04:43
the bus is not increased because the memory bank 04:43
switches present a single load to the bus." 04:43
Do you see that sentence? 04:43
A. I'm sorry, I'm looking at the wrong 04:43
patent. 04:43
THE REPORTER: Do you know what exhibit 04:43
number you're referring to? 04:43

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MS. ZHONG: 1037. 04:43
THE WITNESS: I do see that. 04:43
BY MS. ZHONG: 04:43
Q. Can we go back to Figure 4 of Ellsberry? 04:43
A. Yes. 04:44
Q. So in Figure 4 of Ellsberry, at the -- at 04:44
the point of where DQ (7:0) and DQS is, there's only 04:44
a single load; is that right? 04:44
A. That's what Ellsberry tells us. 04:44
Q. How does Ellsberry manage to do that? 04:44
MR. CHANDLER: Objection. Form. 04:44
THE WITNESS: I would think it has to do 04:44
with his definition of a load and the detailed 04:44
design of his switches. 04:44
I think what he's really saying is that 04:44
there's not a memory bank load on there; that 04:44
there's -- there's not the load of the memory chips 04:45
on that port. There will be some increased load, 04:45
some de minimis increase in load from the switches 04:45
402 and 404. 04:45
BY MS. ZHONG: 04:45
Q. Okay. So there are two different ranks, 04:45
at least two different ranks, each connected to a 04:45
port A and a port B; is that right? 04:45
A. Correct. 04:45

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Q. Okay. But the memory controller would 04:45
only see the load corresponding to a single rank, is 04:45
that what Ellsberry is saying? 04:45
A. Generally. I think what he's doing is 04:45
he's recognizing that the vast majority of the load 04:45
comes from the physical presence of pins and not 04:46
from internal circuits. And what he's done is now 04:46
he no longer has two sets of pins on those wires but 04:46
only one set of pins from the switch chip in 04:46
Figure 4. 04:46
Q. When you say "the pins," which pins are 04:46
you referring to? 04:46
A. So instead of having the pins 234 and 236 04:46
both physically connected to the host, now he only 04:46
has the pins 230 physically connected to the host. 04:46
Q. Ah. Okay. 04:46
And if during the operation only one of 04:46
the bands is activated, that would also help with 04:46
the fact that the memory controller is only seeing a 04:46
single -- the load corresponding to a single rank; 04:46
is that right? 04:47
A. It can. But again, I think that what he's 04:47
saying is that it's the physical presence of pins on 04:47
the connector that dominates the loading. 04:47
Q. Okay. So what Ellsberry is saying is that 04:47

by merging the 234 and the 236 into the 230 type, 04:47
respectively, the memory device is only seeing a 04:47
single load? 04:47
MR. CHANDLER: Objection. Form. 04:47
THE WITNESS: By combining them using a 04:47
switch in the way that he's described in Figure 4, 04:47
that has the effect of reducing the load from 04:47
approximately 2 to approximately 1. 04:47
BY MS. ZHONG: 04:47
Q. Okay. And by "switch," which switch are 04:47
you referring to? 04:47
A. 402 and 404 act as a switch in Ellsberry. 04:47
It allows -- 04:47
Q. What do you mean by -- go ahead. 04:48
A. It allows -- in a read it allows either 04:48
402 or 404 to be driving bus 230. And in a write, 04:48
it allows the information on 230 to be routed to 04:48
either 234 or 236. 04:48
Q. The square where "write" is written, is 04:48
that a delayed flip-flop? 04:48
A. I don't know what you mean by "delayed 04:48
flip-flop." It is a flip-flop or a latch. 04:48
Q. It has a word "D" in there, so that means 04:48
it's a delayed flip-flop? 04:48
A. No. "D" stands for data. That just means 04:48

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it's the input. 04:48

Q. Oh, okay. 04:48

So the write is -- the control for the 04:48

write is implemented as a flip-flop? And the 04:48

triangle for read, that's a driver; is that right? 04:49

MR. CHANDLER: Objection. Form. 04:49

THE WITNESS: Let me see what it says. 04:49

It's described in the text as 04:49

bidirectional signal drivers, but there is a 04:49

flip-flop that's illustrated in the figure. 04:49

BY MS. ZHONG: 04:49

Q. Is -- go ahead. 04:49

A. That's enough. 04:49

Q. Are those tri-state buffers? 04:49

A. Yes, I believe those are tri-state 04:49

buffers. The bidirectional buffers, I believe. 04:49

They're -- they're buffers that can be disabled. I 04:50

would generally refer to those as tri-state buffers. 04:50

Q. So what's your understanding of tri-state 04:50

buffers? 04:50

A. It has three states normally: High, low 04:50

and disengaged. Or high impedence is the way we 04:50

technically talk about it. 04:50

Q. How do you know, like, these ones can be 04:50

disabled? 04:50

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A. I believe it tells us that in the text. 04:50
Let's see. 04:50
I'm not finding it right now. 04:53
My recollection was that the description 04:53
of that as being an implementation of switch 206 04:53
where it calls those signal drivers that operate as 04:53
a switch, along with the drawing, indicated to me 04:53
that those are tri-state drivers. Because that 04:53
would be a very common configuration as to how one 04:53
would build a switch. 04:54
Q. Are those FET switches? 04:54
A. It depends what you mean by FET switches. 04:54
Everything in these systems is made of FETs. 04:54
When Ellsberry refers to FET switches, 04:54
which I think he's referring to a very specific kind 04:54
of prior art FET switch. I think that more normally 04:54
somebody would call those -- call this a distributed 04:54
multiplexor or a tri-state driver. 04:54
Q. And when you say like everything in the 04:54
system is made of FET switches, what do you mean by 04:54
that? By FET, do you mean transistors? 04:55
A. FET stands for field effect transistors. 04:55
MR. CHANDLER: Objection. Form. 04:55
THE WITNESS: All of the logic in these 04:55
systems is comprised of field effect transistors. 04:55

1 But Ellsberry uses the term "FET switch" in a very 04:55
2 common way where he's talking about what we would 04:55
3 call a -- a passthrough FET or a transmission gate 04:55
4 where he's talking about a very specific 04:55
5 configuration of a FET as was used in some of the 04:55
6 prior art references. 04:55
7 It's very clear when you read Ellsberry as 04:55
8 a whole that he's building switches out of this 04:55
9 circuit and it's comprised of FETs, but it's not 04:56
10 what he calls a FET switch. 04:56
11 BY MS. ZHONG: 04:56
12 Q. What is a passthrough FET? 04:56
13 MS. ZHONG: F-E-T, Court Reporter. 04:56
14 THE WITNESS: It's where you connect a 04:56
15 signal between the source and the drain of the FET 04:56
16 as opposed to connecting the signal to the gate of 04:56
17 the FET. It's a different configuration. 04:56
18 And it can be used in certain 04:56
19 circumstances. And Ellsberry refers specifically to 04:56
20 something even narrower, to a stand-alone FET chip 04:56
21 that was used in the prior art. 04:56
22 And he wanted to use a different 04:56
23 configuration that was faster of using these 04:56
24 tri-state drivers or this distributed multiplexor 04:56
25 that wouldn't commonly be called a FET switch. It 04:57

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1 would commonly be called by another name. 04:57
2 BY MS. ZHONG: 04:57
3 Q. And you also mentioned a transmission gate 04:57
4 FET switch; is that correct? 04:57
5 A. Yes. Again, that's just another name for 04:57
6 the configuration where the source and drain are 04:57
7 used to couple a signal rather than driving the 04:57
8 signal through the gate. 04:57
9 It's essentially a configuration in which 04:57
10 you don't power the output signals, and therefore, 04:57
11 it can -- it can have limited utility, where this is 04:57
12 a configuration where you would power the output 04:57
13 signals and would be faster. 04:57
14 Q. You did not find any disclosure upon your 04:58
15 review just now of disabling the flow 2 and flow 3; 04:58
16 is that right? 04:58
17 MR. CHANDLER: Objection. Form. 04:58
18 THE WITNESS: No, I wouldn't say I didn't 04:58
19 find it, in those words. But I -- it certainly 04:58
20 talks about them comprising a switch 206, which 04:58
21 would mean that one's operating and one's not. 04:58
22 And also, if you look at Figure 8 and 04:58
23 understand its operation, you would understand that 04:58
24 as well. 04:58
25 And then if you look at the description of 04:58

the digital drivers described in paragraph 31 which 04:58
would correspond to these, then you would understand 04:59
that only one of them is driving the bus 230 at a 04:59
time during a read operation. 04:59
It also describes them in paragraph 33 04:59
that the ports are multiplexed onto the DIMM 04:59
interface 202, which corresponds to 230. And 04:59
multiplexing means switching one at a time. 04:59
BY MS. ZHONG: 04:59
Q. And paragraph 33 is an implementation 05:00
where write data is sent to both ports A and B, 05:00
right? 05:00
A. Yes, in what's described in that 05:00
embodiment in paragraph 33. At the beginning of the 05:00
paragraph that's how it works. At the end of the 05:00
paragraph it describes the other embodiment. 05:00
Q. You're talking about alternatively when 05:00
row/bank mode addressing is used, read and write 05:00
commands -- (indiscernible.) 05:01
THE REPORTER: I'm sorry, Counsel. Repeat 05:01
your question, please. 05:01
BY MS. ZHONG: 05:01
Q. You are referring to alternatively when 05:01
row/bank mode addressing is used, read and write 05:01
commands are sent only to the targeted memory device 05:01

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and a no-op operation is sent to the nontarget 05:01
memory device? 05:01
A. Yes. 05:01
Q. That's referring to sending commands to 05:01
the targeted memory device, not data, right? 05:01
A. In the case of -- it's essentially -- it's 05:01
exactly what's described in Figure 8. So it's 05:01
describing how the commands are sent. The command 05:01
is sent to only one of the banks in that situation. 05:02
The data operates -- 05:02
Q. But the data -- 05:02
A. The data -- it doesn't really matter 05:02
whether or not the data is sent to both banks on a 05:02
write operation, but it would be multiplexed as 05:02
described in that paragraph on a read operation. 05:02
Q. Okay. So the data is multiplexed and is 05:02
sent to both banks because -- because only one of 05:02
the bank receives a read and write command, only one 05:02
of the bank will actually read that data; is that 05:02
right? 05:02
MR. CHANDLER: Objection. Form. 05:02
THE WITNESS: You don't send data to a 05:02
bank on a read command. 05:02
BY MS. ZHONG: 05:02
Q. Sorry. So let's say it's a write 05:02

operation, and the write command is only sent to one 05:02
rank, and a no-op command is sent to the other rank. 05:02
So even though data is sent to both of them, only 05:03
the rank that receives the write command will 05:03
actually read the data; is that right -- will 05:03
actually write the data? 05:03
MR. CHANDLER: Objection. Form. 05:03
THE WITNESS: If that's how it's built, 05:03
that would be true. It's silent as to whether or 05:03
not it sends the write data to both ports because it 05:03
doesn't matter. 05:03
It's clear that the read data is only 05:03
forwarded from one port through the switch. And 05:03
it's clear that the command -- for example, a write 05:03
command -- would only be sent to one port at a time. 05:03
BY MS. ZHONG: 05:03
Q. Okay. But in that operation, for example, 05:03
where the write data is sent to both port A and 05:03
port B, would there be a problem of bus conflict? 05:04
MR. CHANDLER: Objection. Form. 05:04
THE WITNESS: No, because on a write -- 05:04
BY MS. ZHONG: 05:04
Q. Why not? 05:04
A. -- the memory chips are listening, and the 05:04
DQs all come from the host and would all be 05:04

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1 replicated. So it could operate that way without a 05:04
2 conflict in that particular case. 05:04
3 Q. Okay. So when you have a write operation, 05:04
4 you can have both -- let's go back to Figure 4. 05:04
5 When you have a write operation, you can 05:04
6 have 402 and 404 being turned on at the same time 05:04
7 without having to worry about a write conflict -- or 05:05
8 a bus conflict? 05:05
9 A. What do you mean being turned on? They 05:05
10 could drive ports 234 and 236 conceivably without a 05:05
11 conflict. The conflict happens in the other 05:05
12 direction on a read. 05:05
13 Q. Okay. So when -- so when people talk 05:05
14 about bus conflict, it's more about the read 05:05
15 operation, not the write operation? 05:05
16 MR. CHANDLER: Objection. Form. 05:05
17 THE WITNESS: Correct. That's the 05:05
18 critical case. 05:05
19 BY MS. ZHONG: 05:05
20 Q. Okay. So let me just understand. I'm 05:05
21 getting a little confused. 05:05
22 When you have a write operation, 05:05
23 theoretically you can have -- let's say the data 05:05
24 pass between 230 and 236 and the data pass between 05:05
25 230 and 234 are at the same time without having to 05:05

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worry about a bus conflict; is that right? 05:05

MR. CHANDLER: Objection. Form. 05:06

THE WITNESS: Conceivably you could do 05:06

that in a write. The problem is when you have a 05:06

read. And that's why you need the switches, the 05:06

multiplexing function that's described between 402 05:06

and 404. 05:06

BY MS. ZHONG: 05:06

Q. Okay. So the 402 and 404 multiplexing is 05:06

more important for the read. Write is less of a 05:06

concern because the device would be listening to it, 05:06

and the device has their own controls that they can 05:06

turn things off to avoid burning the bus. 05:06

MR. CHANDLER: Objection. Form. 05:06

THE WITNESS: That would be my 05:06

understanding. 05:06

BY MS. ZHONG: 05:06

Q. But then why in the -- why in modern DDR 05:07

devices the write path, once you are done with the 05:07

write, you kind of turn off -- let me withdraw and 05:07

ask a question. 05:07

You are familiar with DDR4 -- 05:07

(indiscernible.) 05:07

THE REPORTER: I'm sorry. Your question, 05:07

please? 05:07

THE WITNESS: I have some familiarity with 05:07
DDR4, but I don't have it in front of me. 05:07
MR. CHANDLER: Objection. It's outside of 05:07
the scope. DDR4 is not in the declaration, so it's 05:07
definitely outside the scope of the direct. 05:07
MS. ZHONG: Can you stop coaching the 05:07
witness by using speaking objections? 05:07
MR. CHANDLER: I apologize. Object to 05:07
scope and direct. 05:07
BY MS. ZHONG: 05:07
Q. Dr. Wolfe, are you familiar with DDR4 -- 05:07
(indiscernible.) 05:07
A. Generally, but I certainly can't recall 05:08
the entirety of the specification. 05:08
MR. CHANDLER: Objection. Outside the 05:08
scope of the direct. 05:08
Counsel, you're going to run out of time, 05:08
so... 05:08
BY MS. ZHONG: 05:08
Q. So in DDR4 are the -- during a write 05:08
operation, the write path in the data buffer is 05:08
turned on. And then after the write operation that 05:08
data path is turned off. Do you know why that is 05:08
needed? 05:08
MR. CHANDLER: Objection. Outside the 05:08

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scope of direct. 05:08
THE WITNESS: I don't recall that 05:08
specifically. I'd have to look at the specification 05:08
in detail. 05:08
BY MS. ZHONG: 05:08
Q. Can you pull up Exhibit 1033. 05:08
(Exhibit 1033 was marked for 05:09
identification and attached 05:09
hereto.) 05:09
THE WITNESS: Okay. 05:09
BY MS. ZHONG: 05:09
Q. Can you go to page 413? 05:09
Are you there? 05:09
A. Yes. 05:09
Q. Do you see that at the end of the first 05:09
paragraph for Section 10.2.2 it says, "The word 05:09
'rank' is now used to denote a set of DRAM devices 05:09
that operate in lockstep to respond to a given 05:09
command in a memory system"? 05:09
A. I see that. 05:09
Q. What does "in lockstep" mean? 05:09
A. It means if the set of DRAMs includes more 05:10
than one, they are producing their data outputs and 05:10
output clocks at the same time. 05:10
You have to read it in the context at the 05:10

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beginning of the paragraph where it's talking about 05:10
one or more. 05:10
Q. Can you go to Exhibit 1035, Perego? 05:10
A. Okay. 05:10
Q. Can you go to column 7? Can you read the 05:10
paragraph starting in line 48 and ends in line 64? 05:11
A. I see that. 05:11
Q. Can you explain what Perego means by the 05:11
description in column 7, lines 54 to 64? 05:11
A. Perego is explaining that one of the 05:11
things that he teaches is the ability to change the 05:11
width of the communication bus between the memory 05:11
module and the host. And that if you implement that 05:12
feature, then when you change the bit width you are 05:12
not abandoning a portion of the memory. You are 05:12
increasing the serialization ratio. So you can 05:12
still access the same amount of memory. You would 05:12
simply do it in a larger number of steps. Or if you 05:12
were to make the -- the module width wider, you 05:12
don't access more memory. You simply can access it 05:12
in a fewer number of steps. 05:12
Q. Okay. So what this passage means is that 05:12
the memory access bit width would be constant. It's 05:12
just the number of transfers that you have to do 05:13
varies, depends on the considerable bit width of the 05:13

processor; is that right? 05:13
A. In some of Perego's embodiments, that 05:13
would be the case. 05:13
Q. Okay. And the memory access bit width, 05:13
that's the number of bits the memory module would 05:13
output in response to a single read or write 05:13
operation, right? 05:13
A. Say the phrase again. 05:13
Q. So the number of bits that -- and the 05:13
memory access bit width, that is the number of bits 05:14
the memory module would output in response, for 05:14
example, to a single read operation command, 05:14
correct? 05:14
MR. CHANDLER: Objection. Form. 05:14
THE WITNESS: Can you point me to a 05:14
particular column and line? 05:14
BY MS. ZHONG: 05:14
Q. I'm just asking you in this paragraph. 05:14
A. Remind me the -- the range again? 05:14
Q. 7, 54 to 64. 05:14
A. I'm not finding that particular phrase. 05:14
Am I missing it? 05:15
Q. I thought what you said your understanding 05:15
of what's described in this passage is that the 05:15
amount of memory access is not changed. The only 05:15

1 thing that's changed is the serialization ratio. 05:15
2 A. Correct, and that's -- 05:15
3 Q. Is that what you -- 05:15
4 A. Yes, that's when you change what Perego 05:15
5 calls the configured buffer device interface width. 05:15
6 Q. But in that situation what Perego calls 05:15
7 the WA, or the memory access bit width, that is not 05:15
8 changed; is that right? 05:16
9 A. In certain embodiments that would be true. 05:16
10 Q. Okay. And the memory access bit width, 05:16
11 WA, that is the number of bits the memory module 05:16
12 would output in response, for example, to a single 05:16
13 read command from the computer system; is that 05:16
14 right? 05:16
15 MR. CHANDLER: Objection. Form. 05:16
16 THE WITNESS: Yes, but Perego calls it the 05:16
17 memory device access width. 05:16
18 BY MS. ZHONG: 05:16
19 Q. So the memory device access width, WA, 05:16
20 that is the number of bits the memory module would 05:16
21 output in response to a single read command from the 05:16
22 computer system, correct? 05:16
23 MR. CHANDLER: Object to form. 05:16
24 THE WITNESS: No. That's the number of 05:16
25 bits that one rank would output at a time in 05:16

response to a single read request. 05:16
BY MS. ZHONG: 05:17
Q. Okay. So the memory device access width, 05:17
WA, is the number of bits that one rank of memory 05:17
devices would output at a time in response to a 05:17
single read request, correct? 05:17
A. I believe so, yes. 05:17
Q. And the memory device access width, WA, is 05:17
also the number of bits that one rank of memory 05:17
devices would score at a time in response to a 05:17
single write request; is that right? 05:17
A. Yes. 05:17
Q. What other WAs that's described in Perego, 05:17
what are the specific memory device access width 05:18
that's referenced in Perego? 05:18
Let me withdraw and ask you a different 05:18
question. 05:18
So if you can go to Perego, column 14, 05:18
lines 10 through 15. 05:18
A. Okay. 05:19
Q. In this example, what is the memory access 05:19
bit width -- or memory device access width? 05:19
A. In this particular example it's 64 bits. 05:19
Q. It's 64 bits for each of the interface 05:19
520A and 520B, right? 05:19

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A. Yes. 05:19
Q. So why isn't it 128? 05:19
A. Oh, yeah, it could be, yep. 05:19
Q. So the interface 520A and 520B can be 05:19
operating concurrently; is that right? 05:19
A. Not concurrently. Sequentially, I 05:19
believe. 05:19
Q. Sequentially? 05:19
A. Yeah. 05:19
Q. Okay. 05:19
A. I believe that -- 05:19
Q. They can't -- 05:19
A. I believe Perego describes both. 05:19
Q. Okay. When you say he describes both, 05:19
what do you mean? Both as referring to what? 05:20
A. I believe that he says that they can 05:20
operate either concurrently or one at a time. 05:20
Q. And is each interface 520A and 520B a 05:20
channel as shown in Figure 4A or 4B then? 05:20
A. It's one or more channels. 05:20
Q. In Perego Figure 4A, do the channels 05:20
operate concurrently or do they always operate at 05:20
different times? 05:20
A. They certainly can operate at different 05:21
times. I thought I recall a disclosure in Perego 05:21

that as an alternative they can operate 05:21
concurrently. 05:21
Q. So if the channels are operating 05:21
concurrently, say, in Figure 4A, how many ranks are 05:21
there? 05:21
A. If they're operating concurrently there's 05:21
only one. That would not be the embodiment that I 05:21
relied on. 05:21
Q. Okay. So you have the line item 05:22
embodiment where the channels are not operating 05:22
concurrently? 05:22
MR. CHANDLER: Objection. Form. 05:22
THE WITNESS: I'm relying on an embodiment 05:22
where each channel is one rank. 05:22
BY MS. ZHONG: 05:22
Q. Okay. So I think you mentioned that each 05:22
channel can also operate sequentially. So if the 05:22
sequential operation is in response to a single read 05:22
request, does that mean there are two ranks of 05:22
memory devices or just a single rank? 05:22
A. It wouldn't be a single request at the 05:22
memory device. They could have been derived from a 05:22
single request at the host because the host believes 05:22
there's one rank. That's the core -- 05:23
Q. Okay. 05:23

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A. -- idea of rank multiplication is that 05:23
the host believes it's talking to one rank. But in 05:23
fact the logic splits the commands into two sets of 05:23
commands so that in fact there are physically two 05:23
ranks. 05:23
Q. Okay. So when you say they operate 05:23
sequentially, that means one channel is responding 05:23
to one of the -- how should I say it? -- decoded 05:23
read request, and the second channel is responding 05:23
to the second decoded read request; is that right? 05:23
MR. CHANDLER: Objection. 05:23
THE WITNESS: I think generated is a 05:23
better term than decoded. But with that 05:23
substitution, I would agree. 05:23
BY MS. ZHONG: 05:24
Q. So when you define a rank to say that it 05:24
is "a subset of one or more memory devices on a 05:24
memory module that act together in response to 05:24
command signals, including chip select signals, to 05:24
read or write the full bit width of the memory 05:24
module," which command signals are you referring to? 05:24
The command signal that's being sent from the host 05:24
or the one that's regenerated? 05:24
A. The one that's provided to the memory 05:24
devices, which in the case of the claimed devices 05:24

1 would be the one that's being generated. 05:24
2 Q. Does that mean the command signal that's 05:25
3 received from the host system is different from a 05:25
4 command signal that's being sent to the memory 05:25
5 device then? 05:25
6 MR. CHANDLER: Objection. Form. 05:25
7 THE WITNESS: It can be. It can be. 05:25
8 Because it believes that it's talking to a single 05:25
9 rank when in fact it's talking to multiple ranks 05:25
10 in -- in the real world. So that may require just 05:25
11 replicating the signal at different times or it may 05:25
12 require modifying it. 05:25
13 BY MS. ZHONG: 05:25
14 Q. But I thought you said a command signal 05:25
15 only does not include bank addresses or row 05:25
16 addresses. It only includes signals like chip 05:25
17 select and RAS, CAS, and WE; is that right? 05:26
18 A. Correct. So the alteration would be the 05:26
19 time at which those pins are asserted. That's how 05:26
20 they're generated as being -- by having them be 05:26
21 asserted at a different time for the different 05:26
22 ranks. 05:26
23 Q. And you also said that for -- to send the 05:26
24 command signals to DDR2 or DDR device, chip select 05:26
25 signals need not be received, but it can be 05:26

generated internally by some logic on the memory 05:27
module; is that correct? 05:27
MR. CHANDLER: Objection. Form. 05:27
THE WITNESS: I'm not sure I understand 05:27
the question. 05:27
BY MS. ZHONG: 05:27
Q. Okay. I thought you mentioned earlier 05:27
that the -- in response to description in Perego, 05:27
that Perego is using addresses to select a subset of 05:27
the memory devices. I thought you said chip select 05:27
signals can be generated based on those received 05:27
address bits and there need not be a separate chip 05:27
select signal; is that correct? 05:27
MR. CHANDLER: Objection. Form. 05:27
THE WITNESS: I don't recall the context 05:28
of that comment. 05:28
I think what I might have said is that 05:28
there doesn't have to be a separate chip select wire 05:28
in every embodiment. But there has to be a -- 05:28
something that selects the chip. 05:28
BY MS. ZHONG: 05:28
Q. But the chip select signal can be 05:28
generated internally on the memory module in 05:28
response to the information it receives; is that 05:28
correct? 05:28

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MR. CHANDLER: Objection. Form. 05:28
THE WITNESS: Again, it depends on the 05:28
embodiment, but I think that that could -- could be 05:29
done. Not necessarily that that would be the normal 05:29
way that anybody would implement Perego, but I think 05:29
conceivably that could be done. 05:29
BY MS. ZHONG: 05:29
Q. Okay. So let's go back to Perego, column 05:29
15, line 37 to 40. Are you there? 05:29
A. Yes. 05:29
Q. So in that instance, the subset of the 05:29
signal lines are selected via address bits; is that 05:29
right? 05:29
MR. CHANDLER: Objection. Form. 05:29
THE WITNESS: In that one very special 05:30
case and that one embodiment, you can select a 05:30
target subset of secondary channel signal lines via 05:30
address bits and -- 05:30
BY MS. ZHONG: 05:30
Q. By selecting -- 05:30
MR. CHANDLER: Objection. I don't think 05:30
he was done. I don't think he was done with his 05:30
answer. 05:30
THE WITNESS: I don't think you would 05:30
enable specific devices based on address bits alone. 05:30

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BY MS. ZHONG: 05:30
Q. Okay. But by selecting a subset of 05:30
secondary channel signals, are you selecting a 05:30
particular group of devices to respond to a single 05:30
read or write request? 05:30
MR. CHANDLER: Objection. Form. 05:31
THE WITNESS: I don't think so. Not in 05:31
that situation. I think that that's specific to 05:31
channel signal lines. 05:31
BY MS. ZHONG: 05:31
Q. So you don't think this is describing 05:31
grouping devices into independent target subsets? 05:31
MR. CHANDLER: Objection. Form. 05:31
BY MS. ZHONG: 05:31
Q. So why don't you read a few lines down, 05:31
column 7, lines 40 to 45. 05:31
A. Again, I don't think it has to do with 05:31
enabling or disabling devices. I think it simply 05:31
has to do with being able to impact the number of 05:31
independent banks that are open at a time. 05:31
Q. When you say "independent banks," which -- 05:31
what do you mean? 05:31
A. It would mean the number of page registers 05:32
which can be activated corresponding to different 05:32
addresses. 05:32

Q. But all these are in a single rank? 05:32
A. No. I think this is talking about 05:32
throughout the system. 05:32
Q. So you don't think this paragraph has 05:32
anything to do with grouping devices into different 05:32
ranks? 05:32
MR. CHANDLER: Objection. Form. 05:32
THE WITNESS: I do not think that this 05:32
paragraph specifies how ranks are selected or 05:32
enabled. 05:32
BY MS. ZHONG: 05:32
Q. Does Perego discuss how different ranks 05:32
are selected or enabled? 05:32
A. I believe so. You have to look back at 05:33
what I referenced in my declaration. 05:33
Q. I did a search for the word "rank" in 05:33
Perego and I came up empty handed. Do you recall -- 05:33
A. I think that's right. I think we already 05:33
talked about this. I believe Perego does not use 05:33
the specific word even though he clearly discloses 05:33
the concept. 05:33
Q. And the concept being in response to a 05:33
single read or write operation it outputs a certain 05:33
number of bits? Is that what you're referring to? 05:33
A. Yes, one or more memory devices that 05:33

respond to a single operation. 05:33

Q. So if Perego uses DDR or DDR2 devices, how 05:34
many address bits would it need in order to perform 05:34
a read -- like how many control signal bits would it 05:34
need in order to perform a read operation, for 05:34
example? 05:34

MR. CHANDLER: Objection. Form. 05:34

THE WITNESS: That would depend on the 05:34
particular devices that were chosen and how many of 05:34
them were chosen. 05:34

BY MS. ZHONG: 05:34

Q. So let's say it's a x8 DDR2 device. 05:34

A. It still depends on how many of them are 05:35
used, how many are used per rank, and what the 05:35
capacity of each device is. 05:35

Q. I thought for a read operation all the 05:35
devices in a rank are deselected, correct? 05:35

A. Yes, but the number of address bits that 05:35
are involved varies based on a number of factors 05:35
that I've mentioned. 05:35

Q. Okay. So why don't we go to page 92 of 05:35
your declaration. 05:35

A. Okay. 05:35

Q. And on page 92 you have listed six types 05:35
of DDR2 device, correct? 05:35

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A. Correct. 05:35
Q. Let's say for the 32Mbx16 DDR2 device for 05:35
a read operation, how many control address bits do 05:36
you need for a single read operation? 05:36
MR. CHANDLER: Objection. Form. 05:36
THE WITNESS: I'm not sure what you mean 05:36
by "control address bit." 05:36
BY MS. ZHONG: 05:36
Q. Oh, a command address bit. 05:36
MR. CHANDLER: Objection. Form. 05:36
THE WITNESS: I also don't know what you 05:36
mean by "command address bit." 05:36
BY MS. ZHONG: 05:36
Q. Well, on page 93 you have a command truth 05:36
table, correct? 05:36
A. Yes. 05:36
Q. So for a read and write operation you need 05:36
all the signals that's listed here, correct? 05:36
MR. CHANDLER: Objection. Form. 05:36
THE WITNESS: Not necessarily. It depends 05:37
how much memory you have. 05:37
BY MS. ZHONG: 05:37
Q. When you say depends on -- we are talking 05:37
about 32Mbx16 device? 05:37
A. Correct. For example, that device does 05:37

not use a 15, which is shown in Table 10. 05:37

Q. Okay. I'm just asking you, like, how many 05:37

bits do you need in order to define a read operation 05:37

for a memory module with 32Mbx16? 05:37

MR. CHANDLER: Objection. Form. 05:37

THE WITNESS: Are you asking me to assume 05:37

that that's the only memory chip on the module? 05:37

BY MS. ZHONG: 05:37

Q. Yes. 05:37

A. If you had a memory module with only a 05:37

single 32Mbx16 memory chip on it, then with respect 05:37

to the command and address signals that are shown in 05:38

Table 10, you would need one, two, three, four -- 05:38

five command signals, plus two bank address signals, 05:38

plus 13 address signals. 05:38

Q. So it's 13 plus 2 is 15, plus, you said, 05:38

five? 05:38

A. Of the signals that are listed -- of the 05:38

signals that are listed here. We'd have to go back 05:38

to Exhibit 1029. I'm sure there's other signals 05:38

that get provided that are more ancillary. 05:38

Q. Okay. If you have two 32Mbx16 memory 05:38

devices on the memory module, how many signal bits 05:38

do you need in order to perform a read operation? 05:39

A. It depends how they're configured. If 05:39

they're configured, you know, x32 configuration as a 05:39
single rank, then you would need the same number of 05:39
control and address signals from those listed in 05:39
Table 10. 05:39
Q. So, again, 20 signals -- signal bits? 05:39
A. Correct. 05:39
Q. Would they be arranged in what you call 05:39
two-rank configuration or a x16 bit width module? 05:39
MR. CHANDLER: Objection. Form. 05:39
THE WITNESS: Then you would need an 05:39
additional chip select at least. 05:39
BY MS. ZHONG: 05:40
Q. Okay. So about 21. And so if I had four 05:40
32Mbx16 in four ranks, then I would need about 23 05:40
signals -- 05:40
A. From among those that are discussed. 05:40
MR. CHANDLER: Objection. Form. 05:40
BY MS. ZHONG: 05:40
Q. -- for a read -- okay. 05:40
A. From those discussed in Table -- sorry. 05:40
MR. CHANDLER: Objection. Form. 05:40
BY MS. ZHONG: 05:40
Q. And we're talking about x16 bit wide 05:40
configurable -- but we're talking about a Perego 05:40
memory module with 16 bit wide path, and you're 05:40

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1 talking about using 23 signal bits? 05:40
2 MR. CHANDLER: Objection. 05:40
3 BY MS. ZHONG: 05:40
4 Q. How can you do that? 05:40
5 A. Well, none of your earlier questions had 05:40
6 anything to do with Perego for the -- for one. But 05:40
7 Perego contemplates a variety of different kinds of 05:41
8 buses that can be used to connect to the host. 05:41
9 BY MS. ZHONG: 05:41
10 Q. I'm talking about Perego's configurable -- 05:41
11 (indiscernible.) 05:41
12 THE REPORTER: I'm sorry. I'm sorry, 05:41
13 Counsel, repeat your question, please. 05:41
14 BY MS. ZHONG: 05:41
15 Q. So in Perego with a WDP of 16, how would 05:41
16 the 23 bits needed for a single read operation be 05:41
17 sent or received by the memory module? 05:41
18 A. If you were to make all those assumptions 05:41
19 and make that decision about Perego, Perego 05:41
20 contemplates both interfaces to the host in which 05:41
21 data and address share the interface or also where 05:42
22 it's only the data that is configurable. 05:42
23 So certainly Perego contemplates modules 05:42
24 in which the address and control lines are distinct 05:42
25 from the configurable data lines. 05:42

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Q. Okay. So what you're saying is that when 05:42
you say WDP is 16, it's only for the data bits? It 05:42
doesn't include the control and signal bits; is that 05:42
right? 05:42
A. In at least some of the embodiments that 05:42
are disclosed by Perego. 05:42
Q. And the control and signal bits are sent 05:42
on separate wires? 05:42
A. In at least some embodiments, yes. 05:42
Q. Okay. So in the x16 embodiment that you 05:42
are relying on, if we are talking about data like 05:42
memory bus, you are going to have a 23 bit wide -- 05:43
at least a 23 bit wide control and signal pins and a 05:43
16 bit wide data path? 05:43
Is that what you're saying? 05:43
MR. CHANDLER: Object to form. 05:43
THE WITNESS: If you intended -- you would 05:43
have -- at least in a JEDEC-style interface, you 05:43
would have at least 23 command and address signals 05:43
and at least 16 data signals in the situation in 05:43
which you decided to have a 16 bit wide data bus in 05:43
an embodiment of Perego. 05:43
BY MS. ZHONG: 05:43
Q. And the 16 bit wide data bus is the one 05:44
you relied on in your example, correct? 05:44

A. I did rely on that in some of my examples. 05:44
Q. And did you discuss how the control and 05:44
address signals are sent and received by Perego's 05:44
DIMMs? 05:44
A. To the extent that they're tied to the 05:44
claim language I did. 05:44
Q. Can you point me to that? 05:44
A. Boy, you know, it's throughout my 50-plus 05:44
pages of description of how Perego matches the 05:44
claims. 05:45
One example is in paragraph 119. 05:45
Q. Okay. 05:45
A. But I discuss it repeatedly throughout 05:45
that section. Discussed it in paragraph 124, you 05:45
know. I know I extensively map it to the claims in 05:45
paragraphs 107 through 187. 05:45
Q. Okay. So in paragraph 119 did you discuss 05:45
whether the control address information on 05:45
controller is received in a packetized fashion or 05:45
whether it is -- (indiscernible.) 05:45
THE REPORTER: I'm sorry, Counsel, you're 05:46
fading again. "Controller is received"... 05:46
BY MS. ZHONG: 05:46
Q. So in paragraph 19 did you discuss whether 05:46
the control and address information is received in a 05:46

1 packetized format, a parallel bus format, or 05:46
2 otherwise? 05:46
3 A. Not in that particular paragraph I don't, 05:46
4 no. 05:46
5 Q. Okay. 124, do you discuss it there? 05:46
6 A. I do. For example, I quote in -- on page 05:46
7 68 where Perego says that the "control lines may 05:46
8 comprise individual control lines, for example, row 05:47
9 address strobe, column address strobe, and address 05:47
10 lines." 05:47
11 Q. Is that referring to the RQ between the 05:47
12 secondary channel and device? 05:47
13 A. I think it's applicable to both RQs. Both 05:47
14 the ones between the secondary channels and the 05:47
15 device and also between the second device and the 05:47
16 host. 05:47
17 Q. Does it call out a chip select signal? 05:47
18 A. Not in that particular citation it does 05:47
19 not. 05:47
20 Q. And you have confirmed earlier that you 05:48
21 don't see a description of chip select signal in 05:48
22 Perego, correct? 05:48
23 MR. CHANDLER: Objection. Form. 05:48
24 THE WITNESS: I think I said that I didn't 05:48
25 see a specific recitation of a -- of a signal called 05:48

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chip select, but that a person of ordinary skill 05:48
would understand that one is necessary if one 05:48
implements it using the JEDEC standard for DDR 05:48
memory devices. 05:48
BY MS. ZHONG: 05:48
Q. But then not the specific chip select 05:48
wire; is that correct? 05:48
MR. CHANDLER: Objection. Form. 05:48
BY MS. ZHONG: 05:49
Q. Is that correct? 05:49
A. There's not one with that name. But that 05:49
capability is, I believe, disclosed. And again, a 05:49
person of ordinary skill would look to the JEDEC 05:49
standard for the particular name of that signal with 05:49
respect to implementing Perego. 05:49
Q. But there need not to be a specific pin 05:49
for chip selection, correct? 05:49
MR. CHANDLER: Objection. Form. 05:49
THE WITNESS: Perego doesn't require one. 05:49
But a person of ordinary skill in the art 05:49
understanding JEDEC would be motivated to implement 05:49
one. Certainly Perego talks about individual 05:49
signals for control -- individual wires or lines for 05:49
control signals. 05:49
BY MS. ZHONG: 05:49

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Q. Why would someone implement using -- 05:49
implement a memory module with only 16-bit-wide data 05:49
path but 23 bit and higher control path? 05:50
A. Because it can be economical and effective 05:50
to do so. Those are two independent decisions. 05:50
The control path is based on how many 05:50
different commands and how many different addresses 05:50
one needs to implement. And the data path is based 05:50
on the data bandwidth. 05:50
We can look at a real-world example in 05:50
Exhibit 1029 where JEDEC recommends building chips, 05:50
for example, that have more than 16 control signals 05:50
but only 16 data signals. 05:50
Q. That's on the device side but not on the 05:51
memory side? 05:51
THE REPORTER: I'm sorry, Counsel, one 05:51
more time. 05:51
BY MS. ZHONG: 05:51
Q. That's on the device side but not on the 05:51
memory module side, correct? 05:51
A. With respect to Exhibit 1029, that's true, 05:51
it is discussing devices. But the motivations would 05:51
be the same. 05:51
MS. ZHONG: Let's take a five-minute 05:51
break. 05:51

MR. CHANDLER: All right. 05:51
(Recess.) 05:55
(Off record: 5:51 p.m.) 05:55
(On record: 5:55 p.m.) 05:55
MS. ZHONG: Thank you very much, 05:55
Dr. Wolfe. 05:55
I pass the witness. 05:55
MR. CHANDLER: Let's go off the record. 05:55
Let me review my notes to see what questions I may 05:55
have. 05:55
(Recess.) 05:59
(Off record: 5:59 p.m.) 05:59
(On record: 6:13 p.m.) 05:59

EXAMINATION

BY MR. CHANDLER: 06:12
Q. Dr. Wolfe, I'd like to follow up on 06:12
questions that counsel for Netlist asked you. 06:13
Starting with Exhibit 1037, the Ellsberry 06:13
reference. Could you pull up Exhibit 1037 and let 06:13
me know when you have it in front of you? 06:13
A. Okay. I have it. 06:13
Q. With reference to paragraph 31, as well as 06:13
Figure 2 and Figure 4, I want to ask some follow-up 06:13
questions to the questions you were asked. 06:13
Do you have that paragraph and those 06:13

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figures in front of you? 06:13
A. Yes. 06:13
Q. Does Ellsberry disclose an embodiment 06:13
where for a write operation, the switch ASIC routes 06:13
the data only through one port such as port B and 06:14
not through the other port such as port A? 06:14
MS. ZHONG: Objection. Form. Leading. 06:14
THE WITNESS: It does. You can see it in 06:14
paragraph 31. You can see it in Figure 8. And then 06:14
I believe it's also claimed in Claim 1. 06:14
BY MR. CHANDLER: 06:14
Q. In your opinion, does Ellsberry in all of 06:14
its embodiments always send write data through both 06:14
port A and port B? 06:15
A. No. If you look at Figure 8, you can see 06:15
that on a write, it enables -- it sends the data 06:15
through port A on the first cycle and then through 06:15
port B on the second cycle. And I think that that's 06:15
suggesting that it's only that port during those 06:15
cycles. 06:15
It also talks in paragraph 31 about 06:15
disabling one of the ports so that it's written to 06:15
the correct memory bank. 06:15
And then in Claim 1 it specifically says 06:15
that it directs the data information to one of a 06:15

plurality of physical memory banks. 06:15

Q. Now, you were asked some questions about 06:15

paragraph 33. Is there an embodiment in 06:15

paragraph 33 where write data is sent to both 06:16

ports A and B? 06:16

A. Yes. It's the -- the -- let's see if I 06:16

remember what it's called. It's -- it's the 06:16

column-based embodiment. 06:16

Q. Okay. And is the column-based embodiment 06:16

of Ellsberry where data is sent through both ports A 06:16

and B, is that the only embodiment in Ellsberry or 06:16

is there a different embodiment where write data is 06:16

sent through only one port and the other port is 06:16

disabled? 06:16

A. Yeah, there's another embodiment -- 06:16

MS. ZHONG: Objection. 06:16

THE WITNESS: I'm sorry. 06:16

MS. ZHONG: Objection. Form. Leading. 06:17

THE WITNESS: There's another embodiment 06:17

that we talked about before that's described at the 06:17

end of paragraph 33 that says, "When row/bank mode 06:17

addressing is used, read and write commands are sent 06:17

only to the targeted memory device. A no-op 06:17

operation command is sent to the non-targeted memory 06:17

device." 06:17

If you look at that particular mode in 06:17
Figure 8, you can see that the data as well is only 06:17
sent to a particular port. 06:17
BY MR. CHANDLER: 06:17
Q. Is the row/bank mode used for both write 06:17
operations and read operations in Ellsberry? 06:17
A. Yes. 06:17
Q. When using the row/bank mode in Ellsberry 06:17
for a write operation, does Ellsberry disclose an 06:17
embodiment where one port is enabled to transfer the 06:17
data to the memory devices but the other port is 06:18
disabled and does not transfer the data to the 06:18
memory devices? 06:18
MS. ZHONG: Objection. Form. Leading. 06:18
THE WITNESS: Yes, it's my understanding 06:18
that it does. 06:18
BY MR. CHANDLER: 06:18
Q. Could you look at paragraph 12 and 06:18
Figure 4? I want to follow up on some questions you 06:18
were asked about presenting a single load to the 06:18
bus. 06:18
Just let me know when you have that 06:18
paragraph and Figure 4 in front of you. 06:18
A. Okay. 06:19
Q. Does Figure 4 as drawn present exactly a 06:19

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single load to the bus going to the memory 06:19
controller on the host computer? 06:19
A. Well, as I said before, I think a person 06:19
of ordinary skill in the context of the patent would 06:19
understand that it does because they would 06:19
understand that the load is from the pin. 06:19
And pins on a chip always have a pin 06:19
driver circuit. One would presume that there is one 06:19
here. And it would be that pin driver circuit at 06:19
230 that actually provides the load. And that would 06:19
be a -- in this case because it's bidirectional -- a 06:19
transceiver. It would be a circuit that could do 06:19
both tri-state driving and also input buffering. 06:19
Q. Does Figure 4 of Ellsberry expressly draw 06:19
the pin driver circuit that you just described that 06:19
would present only a single load on bus 230 to the 06:20
host computer? 06:20
MS. ZHONG: Objection. Form. Leading. 06:20
THE WITNESS: No. It -- it shows the 06:20
pins, but it doesn't expressly show the pin driver. 06:20
It doesn't expressly show pin drivers for any of the 06:20
pins, but one would expect them to be there. 06:20
BY MR. CHANDLER: 06:20
Q. If there was no pin driver in Figure 4, 06:20
and instead bidirectional drivers 402 and 404 were 06:20

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connected directly to bus 230 to the memory 06:20
controller on the host computer, would that present 06:20
precisely a single load to the host computer? 06:20
MS. ZHONG: Objection. Form. Leading. 06:21
THE WITNESS: No. As I mentioned before 06:21
in my testimony, there would be some additional load 06:21
from having those two devices directly connected 06:21
there. 06:21
BY MR. CHANDLER: 06:21
Q. So if a person of ordinary skill in the 06:21
art wanted to implement Figure 4 of Ellsberry and 06:21
present precisely a single load on bus 230 to the 06:21
memory controller on the host computer, would they 06:21
need to include the pin driver circuit that you 06:21
mentioned in addition to the other circuitry 06:21
expressly shown in Figure 4? 06:21
MS. ZHONG: Objection. Form. Leading. 06:22
THE WITNESS: Yes, they would, if you 06:22
wanted to have exactly one load -- and this is 06:22
commonly done -- you would have a pin driver 06:22
circuit. 06:22
Again, since this is bidirectional, we 06:22
would typically call it a pin driver. But to be 06:22
specific, it would include both a pin driver and an 06:22
input buffer. 06:22

BY MR. CHANDLER: 06:22
Q. How would that pin driver compare to 06:22
whatever circuitry would be on the memory device at 06:22
its input/output pins? 06:22
MS. ZHONG: Objection. Form. 06:23
THE WITNESS: To my knowledge, all memory 06:23
devices use a pin driver, so it would be essentially 06:23
identical. 06:23
BY MR. CHANDLER: 06:23
Q. And what would be the benefit of having a 06:23
pin driver in Figure 4 of Ellsberry on the bus 230 06:23
connecting to the memory controller, that would be, 06:23
in your words, essentially identical to the pin 06:23
driver that would exist on the memory device itself? 06:23
MS. ZHONG: Objection. Form. Leading. 06:23
THE WITNESS: By this point in time, 06:23
memory controllers are very highly tuned in their 06:23
signaling. So they expect a particular loading at 06:23
the other end of the wire. And the advantage would 06:23
be that it would be consistent with connecting 06:24
memory chips directly to the memory controller in 06:24
the way that one would do if they didn't have rank 06:24
multiplication. So it would be much more likely to 06:24
be compatible. 06:24
MR. CHANDLER: Thank you, Dr. Wolfe. 06:24

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1 Pass the witness. 06:24
2 FURTHER EXAMINATION
3 BY MS. ZHONG: 06:24
4 Q. Dr. Wolfe, did you speak with your counsel 06:24
5 during break? 06:24
6 A. Yes. 06:24
7 Q. Did the discussion have anything to do 06:25
8 with the redirect that we just had? 06:25
9 MR. CHANDLER: Objection. Privileged. 06:25
10 Instruct the witness not to answer. 06:25
11 THE WITNESS: I'm going to comply with my 06:25
12 counsel's instructions. 06:25
13 BY MS. ZHONG: 06:25
14 Q. Did you rely on any of the discussion with 06:25
15 counsel in your response in the redirect? 06:25
16 A. No. 06:25
17 Q. Did you have an understanding as to the 06:25
18 kind of questions you would be asked during the 06:25
19 redirect? 06:25
20 MR. CHANDLER: Objection. Privileged. 06:25
21 Instruct the witness not to answer. 06:25
22 MS. ZHONG: Well, I'm asking what his 06:25
23 understanding is. 06:25
24 Q. So, Dr. Wolfe, did you have an 06:25
25 understanding as to what kind of questions you would 06:25

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be asked during redirect? 06:25

MR. CHANDLER: Objection. Privileged. 06:26

Instruct the witness not to answer. 06:26

THE WITNESS: I'm going to comply with the 06:26

instruction not to answer. 06:26

BY MS. ZHONG: 06:26

Q. Dr. Wolfe, you are not answering because 06:26

you had an inkling of what questions would be asked, 06:26

correct? 06:26

MR. CHANDLER: Objection. Privileged. 06:26

Instruct the witness not to answer. 06:26

THE WITNESS: I'm not answering because I 06:26

was instructed not to answer. 06:26

MS. ZHONG: We will move and ask the Court 06:26

to have you be reproduced to answer the questions. 06:26

I'll make it clear on the record. 06:26

Q. Dr. Wolfe, how much additional load would 06:26

the driver -- let's go back to Figure 4 of 06:26

Exhibit 1037. 06:26

A. Yes. 06:26

Q. You stated, without the pin driver a 06:27

person of ordinary skill in the art would still 06:27

consider the load at 230 as a single load, correct? 06:27

MR. CHANDLER: Objection. Form. 06:27

THE WITNESS: I think what I already said 06:27

is that there would normally be a pin driver. If 06:27
there was not one, then you could have a higher load 06:27
based on the connection to multiple circuits. 06:27
BY MS. ZHONG: 06:27
Q. And my understanding is that you said 06:27
there would be the two -- by combining 234 and 236 06:27
into 230, there would exactly be one load plus some 06:27
loads for 402 and 404; is that correct? 06:27
MR. CHANDLER: Objection. Form. 06:27
THE WITNESS: No. If I said that, I was 06:27
not being precise. By combining them, what you're 06:27
doing is having them share the same pin driver. And 06:28
if you have them share the same pin driver, then 06:28
there would be one load. If somehow you designed it 06:28
without a pin driver, then -- then there would be 06:28
more than one load. 06:28
BY MS. ZHONG: 06:28
Q. How many loads? 06:28
A. It depends on the details of the circuit, 06:28
but nominally somewhere around two. 06:28
Q. And a port is the exit -- is at the exit 06:28
of ASIC, correct? 06:28
A. I didn't get the last couple words. I'm 06:28
sorry. 06:28
Q. A port is at the exit of the ASIC; is that 06:28

correct? 06:28
A. It's at the interface. It could be an 06:28
exit. It could be an entrance. It could be both. 06:29
It's -- it's at -- the port is -- is at the pin. 06:29
It's the interface between the ASIC and the outside 06:29
world. 06:29
Q. Okay. And I think you analogized a port 06:29
as a bowl to the ASIC; is that correct? 06:29
A. I don't know if I analogized it, but I did 06:29
say that that was the historical derivation of the 06:29
word from my understanding. 06:29
Q. So when you disable a port, you can 06:29
basically just shut that door as the interface; is 06:29
that correct? 06:29
A. In a very general sense. In this case, it 06:29
would be more like turning off the drivers at the 06:29
pin. 06:29
Q. Are you referring -- when you say "the 06:30
drivers," you are not referring to the drivers 402 06:30
and 404, are you? 06:30
A. No. Usually they would be pin drivers. 06:30
Q. Okay. So you are referring to the pin 06:30
drivers at port A and B? 06:30
A. Yeah, that would be the normal way to do 06:30
it. 06:30

Q. Okay. So when port A is disabled, that 06:30
just means the pin driver connected to the port A 06:30
pad is disabled; is that right? 06:30
A. Yes, that's generally the case. If we're 06:30
talking about the output functions of port A, then 06:30
that would be what we would be talking about. 06:30
Q. And when you have a write operation, even 06:30
if data is only sent to the memory rank connected to 06:30
port A, can the data path on port B still be open? 06:31
MR. CHANDLER: Objection. Form. 06:31
THE WITNESS: I'm not sure what you mean 06:31
by "open." 06:31
BY MS. ZHONG: 06:31
Q. You said 404 could be disabled, correct? 06:31
404 -- 06:31
A. There is an embodiment in Perego where in 06:31
a write operation port A is enabled and port B is 06:31
disabled on the first cycle. And then on the 06:31
subsequent cycle, port B is enabled and port A is 06:31
disabled. 06:32
Q. Okay. And port A is enabled means the pin 06:32
driver is enabled, and the port B is disabled means 06:32
the pin driver for port B is disabled; is that 06:32
right? 06:32
A. In that particular situation, it's 06:32

correct. 06:32

Q. Okay. But the path between 230 and 234 06:32

can still be open as well as a path between 230 and 06:32

236, correct? Just that the -- 06:32

MR. CHANDLER: Object. 06:32

BY MR. TEZYAN: 06:32

Q. -- to the memory bank, that one can be 06:32

shut down -- shut, correct? 06:32

MR. CHANDLER: Objection. Form. 06:32

THE WITNESS: I don't think it would make 06:33

sense to do that because -- well, in part, if -- 06:33

if -- well, you're definitely driving the signal out 06:33

to port 234. 06:33

It could be latched in the flip-flop in 06:33

404, but it's not being sent out of port B. In 06:33

other words, it's not -- it's not going to be 06:33

leaving the chip on a second port. So it's -- it's 06:33

irrelevant. 06:33

BY MS. ZHONG: 06:33

Q. And it could be -- 06:33

A. I don't think you would enable the entire 06:33

path because 236 includes the external of the chip. 06:33

But you could have a portion of the path that was 06:33

operable. 06:33

Q. Okay. So can I enable up to the exit of 06:33

the ASIC on 236 and just basically turn off the pin 06:33
driver at the point of exit? 06:33
MR. CHANDLER: Objection. Form. 06:33
THE WITNESS: I don't see that disclosed, 06:34
but you could. As long as you don't drive it off 06:34
the chip, nothing outside the chip -- or actually 06:34
nothing would ever know what you were doing on that 06:34
particular wire because it would be disabled and 06:34
it's not connected to anything. 06:34
BY MS. ZHONG: 06:34
Q. Okay. So -- so long as that wire 236 06:34
reaches the chip anywhere before that if I turned it 06:34
off, then that would comply with the description of 06:34
data is only sent to port A but not to port B? 06:34
MR. CHANDLER: Objection. Form. 06:34
THE WITNESS: So 236 isn't a single wire. 06:34
It's -- it's a bus. And it -- it's going to involve 06:34
some wires going to the port pins and then some 06:34
wires extending from the port pins off to the 06:34
memory. And if the port pins are disabled, as long 06:34
as you don't send anything from -- off the chip. As 06:35
long as you don't send anything to the memories, it 06:35
doesn't matter what you would do on the disconnected 06:35
wires internally. But again, I don't see any 06:35
disclosure that you do drive anything there. 06:35

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BY MS. ZHONG: 06:35
Q. Okay. So you can -- Ellsberry does not -- 06:35
is kind of being different as to where the 06:35
disablement occurs. For example, it can occur 06:35
outside of the ASIC on bus 236 so long as it's 06:35
before it reaches the memory bank; is that right? 06:35
MR. CHANDLER: Objection. Form. 06:35
THE WITNESS: No. Ellsberry is specific. 06:35
It happens at the port. It happens at the point 06:35
that signals are able to leave the chip. So that is 06:35
what is disabled. 06:36
BY MS. ZHONG: 06:36
Q. Okay. So if -- so if it is disabled at 06:36
the exit, which is the interface, that's what 06:36
Ellsberry is teaching? 06:36
MR. CHANDLER: Objection. Form. 06:36
THE WITNESS: In the embodiment in which 06:36
ports A and ports B are sequentially disabled, they 06:36
are disabled at the port, at the interface to the 06:36
chip, to the ASIC chip, so that signals do not enter 06:36
or leave the chip on that port. 06:36
BY MS. ZHONG: 06:36
Q. Okay. So it's at the interface of the 06:36
chip? It's not internal to the chip? 06:36
MR. CHANDLER: Objection. Form. 06:36

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THE WITNESS: The teaching is that it's 06:36
disabled at the interface. There's no specific 06:36
teaching as -- as to what happens on wires that go 06:36
to the interface. 06:36
BY MS. ZHONG: 06:36
Q. Okay. So all Ellsberry said when he 06:37
disabled the port, a person of ordinary skill in the 06:37
art would understand that means disabling the bus at 06:37
the point of the interface? 06:37
MR. CHANDLER: Objection. Form. 06:37
THE WITNESS: Yes, in such a way that 06:37
those signals are not provided anywhere where the 06:37
port is disabled. 06:37
BY MS. ZHONG: 06:37
Q. Okay. So the disablement occurs at the 06:37
ASIC interface, correct? 06:37
MR. CHANDLER: Objection. Form. 06:37
THE WITNESS: That is the teaching, yes. 06:37
It may occur in other places as well for engineering 06:37
reasons. 06:37
BY MS. ZHONG: 06:37
Q. But what's expressly disclosed in 06:37
Ellsberry is the disablement occurs at the interface 06:37
of the ASIC chip? 06:37
MR. CHANDLER: Object to form. 06:38

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THE WITNESS: Yes, in such a way that 06:38
those signals are not provided to any other device 06:38
or any other circuit. 06:38
MS. ZHONG: Okay. I don't have any 06:38
further questions other than the questions that you 06:38
refused to answer. 06:38
And this concludes today's deposition. 06:38
MR. CHANDLER: And we'd like a copy of the 06:38
transcript to be able to review, make corrections, 06:38
if appropriate, by Friday. 06:38
(At the time of 6:38 p.m. the deposition
was concluded.)

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DECLARATION

I hereby declare I am the deponent in the within matter; that I have read the foregoing transcript and know the contents thereof; and I declare that the same is true of my knowledge except as to the matters which are therein stated upon my information or belief, and as to those matters, I believe them to be true.

I declare under the penalties of perjury under the laws of the United States that the foregoing is true and correct.

This declaration is executed this _____ day of _____, 20___, at

_____ _____

CITY STATE

_____

ANDREW WOLFE, PH.D.

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C E R T I F I C A T E

I, the undersigned, a Certified Shorthand Reporter for the State of California, do hereby certify:

That the foregoing proceedings were taken before me at the time and place herein set forth; that a verbatim record of the proceedings was made by me using machine shorthand, which was thereafter transcribed under my direction; further, that the foregoing is an accurate transcription thereof.

I further certify that I am neither financially interested in the action nor a relative or employee of any attorney of any of the parties.

IN WITNESS THEREOF, I have this date subscribed my name this 6th day of January, 2023.

ASHALA TYLOR, CLR, RPR, CRR, CSR #2436

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Netlist EX2003
Samsung v Netlist
IPR2023-00454

Federal Rules of Civil Procedure

Rule 30

(e) Review By the Witness; Changes.

(1) Review; Statement of Changes. On request by the deponent or a party before the deposition is completed, the deponent must be allowed 30 days after being notified by the officer that the transcript or recording is available in which:

(A) to review the transcript or recording; and

(B) if there are changes in form or substance, to sign a statement listing the changes and the reasons for making them.

(2) Changes Indicated in the Officer's Certificate. The officer must note in the certificate prescribed by Rule 30(f)(1) whether a review was requested and, if so, must attach any changes the deponent makes during the 30-day period.

DISCLAIMER: THE FOREGOING FEDERAL PROCEDURE RULES ARE PROVIDED FOR INFORMATIONAL PURPOSES ONLY. THE ABOVE RULES ARE CURRENT AS OF APRIL 1, 2019. PLEASE REFER TO THE APPLICABLE FEDERAL RULES OF CIVIL PROCEDURE FOR UP-TO-DATE INFORMATION.

VERITEXT LEGAL SOLUTIONS
COMPANY CERTIFICATE AND DISCLOSURE STATEMENT

Veritext Legal Solutions represents that the foregoing transcript is a true, correct and complete transcript of the colloquies, questions and answers as submitted by the court reporter. Veritext Legal Solutions further represents that the attached exhibits, if any, are true, correct and complete documents as submitted by the court reporter and/or attorneys in relation to this deposition and that the documents were processed in accordance with our litigation support and production standards.

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