[redacted]

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

| | | |
|---|---|---|
| NETLIST, INC., | ) | |
| Plaintiff, | ) | |
| vs. | ) | Civil Action No. |
| SAMSUNG ELECTRONICS CO., LTD., | ) | 2:21-CV-463-JRG |
| SAMSUNG ELECTRONICS AMERICA, | ) | |
| INC., SAMSUNG SEMICONDUCTOR, INC., | ) | |
| Defendants. | ) | |
| | ) | |

CONFIDENTIAL - ATTORNEYS' EYES ONLY

VIRTUAL VIDEOCONFERENCE VIDEO-RECORDED
DEPOSITION OF SUNGJOO PARK

Remotely Testifying from Hwaseong, South Korea
Wednesday, November 23, 2022 (Local GMT+9 Zone)

Stenographically Reported By:
Hanna Kim, CLR, CSR No. 13083
Job No. 5567465



Veritext Legal Solutions
866 299-5127

Netlist EX2005
Samsung v Netlist
IPR2023-00454

[redacted]

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[redacted],
virtual videoconference video-recorded deposition of SUNGJOO PARK, remotely testifying from Hwaseong, South Korea, on Wednesday, November 23, 2022 (Local GMT+9 Zone), pursuant to the stipulations of counsel thereof, before Hanna Kim, CLR, Certified Shorthand Reporter, No. 13083.



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REMOTE VIDEOCONFERENCE APPEARANCES OF COUNSEL:

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REMOTE VIDEOCONFERENCE APPEARANCES: (CONTINUED)

ALSO PRESENT:

SOOMI KO, Korean-language main/official interpreter

MICHELLE KIM, Check interpreter

SHAWNA HYNES, Video Operator

NEIL MARTIN, Concierge





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[redacted]

1 [redacted]

18 Q. Let's look at Exhibit 7.

19 Exhibit 7 is a document you prepared;

20 correct? 14:07:38

21 A. Looks like I was the ballot sponsor.

22 Q. This is a document submitted to JEDEC

23 prepared by Samsung Electronics in 2007 discussing

24 DRAM; correct?

25 MS. JESIEN: Objection. Form. 14:08:35

THE WITNESS: I don't think the entire document --

(Interruption in audio/video.)

THE COURT REPORTER: Could you -- could you start that over again, please. 14:09:07

THE MAIN INTERPRETER: Okay.

THE WITNESS: I don't think it was the entire document. I think some portion was modified. And let me look for that.

THE MAIN INTERPRETER: Also, Hanna, 14:09:25 previously the answer is not -- I think I mispronounced it ballot, not "valid," B-A-L-L-O-T.

THE WITNESS: Since these are not color- -- coloring was -- oh, strike that.

Since the fonts are not separated by 14:10:16 colors, I don't exactly know which portion was updated.

BY MR. SHEASBY:

Q. The point is this was a proposal that was sponsored by Samsung? 14:10:30

A. It is true that that's a ballot Samsung sponsor [verbatim], since my name and Samsung's name is there.

Q. And it's from 2007; correct?

A. Yes. That's correct. 14:11:01





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[redacted]

Q. And why don't you turn to PDF page 147 of this document -- 140- -- PDF page 147.

A. Yes, I am there.

Q. Do you see under the section "Seri-" -- "Serial Presence Detect"? 14:11:30

A. Yes, I see that.

Q. It says, quote, "a rank of memory is defined as the collection of SDRAMs," plural, "driven by a given rank select signal."

Do you see that? 14:11:52

A. Yes, I see that.

Q. Sir, this statement is incorrect; the accepted definition of rank in 2007 or 2008 in the concept of DRAM memory modules includes a single DRAM; correct? 14:12:29

MS. JESIEN: Objection. Form.

THE WITNESS: No, that's not right.

[redacted]





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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.

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