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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

[REDACTED]

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
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NETLIST, INC.,)
Plaintiff,)
vs.) Civil Action No.
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SAMSUNG ELECTRONICS AMERICA,)
INC., SAMSUNG SEMICONDUCTOR, INC.,)
Defendants.)
_____)

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

REMOTE VIDEOCONFERENCE APPEARANCES OF COUNSEL:

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SOOMI KO, Korean-language main/official
interpreter

MICHELLE KIM, Check interpreter

SHAWNA HYNES, Video Operator

NEIL MARTIN, Concierge

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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

1 THE WITNESS: I don't think the entire
2 document --
3 (Interruption in audio/video.)
4 THE COURT REPORTER: Could you -- could
5 you start that over again, please. 14:09:07
6 THE MAIN INTERPRETER: Okay.
7 THE WITNESS: I don't think it was the
8 entire document. I think some portion was modified.
9 And let me look for that.
10 THE MAIN INTERPRETER: Also, Hanna, 14:09:25
11 previously the answer is not -- I think I
12 mispronounced it ballot, not "valid," B-A-L-L-O-T.
13 THE WITNESS: Since these are not
14 color- -- coloring was -- oh, strike that.
15 Since the fonts are not separated by 14:10:16
16 colors, I don't exactly know which portion was
17 updated.
18 BY MR. SHEASBY:
19 Q. The point is this was a proposal that was
20 sponsored by Samsung? 14:10:30
21 A. It is true that that's a ballot Samsung
22 sponsor [verbatim], since my name and Samsung's name
23 is there.
24 Q. And it's from 2007; correct?
25 A. Yes. That's correct. 14:11:01

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

3 A. Yes, I am there.

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

6 A. Yes, I see that.

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

10 Do you see that? 14:11:52

11 A. Yes, I see that.

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

16 MS. JESIEN: Objection. Form.

17 THE WITNESS: No, that's not right.

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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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