

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

SONRAI MEMORY LIMITED,

Plaintiff,

v.

MICRON TECHNOLOGY, INC.,

Defendant.

Case No. 1:23-cv-01407-ADA

JURY TRIAL DEMANDED

**SONRAI MEMORY LIMITED’S OBJECTIONS AND RESPONSES
TO MICRON TECHNOLOGY, INC.’S SECOND SET OF
REQUESTS FOR ADMISSION (NOS. 37-43)**

Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure, Plaintiff Sonrai Memory Limited (“Sonrai”) submits these objections and responses to Defendant Micron Technology, Inc.’s (“Micron”) Second Set of Requests for Admission (Nos. 37-43) (“Requests”).

RESERVATION OF RIGHTS AND GENERAL OBJECTIONS

The following reservation of rights and general objections apply to each of the Requests:

1. The responses provided herein reflect Sonrai’s continuing investigation of facts and information relating to claims and defenses at issue in this litigation. Sonrai’s objections and responses to Micron’s Requests are based upon Sonrai’s current knowledge and reasonable beliefs. Sonrai reserves the right to modify, amend, revise, correct and/or supplement any and all of its responses herein, and to assert objections to these Requests as necessary and/or appropriate.
2. By responding to Micron’s Requests, Sonrai does not waive any objection that may be applicable to: (a) the use, for any purpose, by Micron of any information or documents given

in response to Micron's Requests; or (b) the admissibility, relevance, or materiality of any of the information or documents to any issue in this case.

3. No incidental or implied admissions are intended by the responses herein. The fact that Sonrai has answered or objected to a Request should not be taken as an admission that Sonrai accepts or admits the existence of any "fact" set forth or assumed by such Request.

4. Sonrai objects to Micron's definitions and instructions to the extent they seek to expand the requirements of, or are inconsistent with, the Federal Rule of Civil Procedure, the Court's Local Rules, the Scheduling Order, or any governing case law.

5. Sonrai objects to each Request to the extent it seeks discovery that is not relevant to the claims or defenses of any party.

6. Sonrai objects to these Requests to the extent that they seek discovery of Electronically Stored Information ("ESI") from sources that are not reasonably accessible in light of the burdens or costs required to locate, restore, review, and produce whatever responsive information may be found.

7. Sonrai objects to the Requests to the extent that they are unduly burdensome and not proportionate to the needs of this case, considering (1) the requested discovery's marginal (if not non-existent) relevance, (2) the cost associated with responding to and providing the requested discovery, and (3) the alleged amounts in controversy associated with the claims for which the Requests are ostensibly sought. Sonrai's reasonable search for and production of information in response to the Requests will at all times be proportionate to the needs of this case.

8. Sonrai objects to each Request to the extent it seeks information that is publicly available, is as readily available to Micron as to Sonrai, or is already in Micron's possession, custody, or control.

9. Sonrai objects to each of the “Definitions,” “Instructions,” and Requests to the extent that they seek information or documents that are subject to the attorney-client privilege, work product doctrine, joint defense or common interest privilege, any agreement between parties, any court order, or any other privilege, immunity, or protection provided by law, or that are trial preparation materials (collectively, “Privileged Materials”). No Privileged Materials will be produced or disclosed. Additionally, an objection based on the attorney-client privilege and/or work product doctrine or other privilege, immunity, or protection should not be construed as a representation that such information exists or existed. Such objection indicates only that the Request is of such a scope as to embrace subject matter protected by the attorney-client privilege and/or work product doctrine, or other privilege, immunity, or protection. Production, inadvertent or otherwise, of any information subject to any such privilege, protection, or doctrine does not constitute nor should it be deemed to constitute a waiver of any privilege or other immunity from production.

10. Sonrai objects to each Request to the extent that it seeks confidential information of Sonrai or of a third party to whom a duty of confidentiality is owed, including confidential technical and/or financial information. Sonrai will produce such information only after any necessary consent has been obtained from any such third party.

11. Sonrai objects to the Requests to the extent they are vague, ambiguous, do not identify with particularity the information sought, or are otherwise incomprehensible.

12. Sonrai objects to the Requests to the extent they are overly broad and/or seek materials that are not reasonably accessible because of undue burden or cost.

13. Sonrai objects to each Request as premature to the extent it seeks merits discovery or expert testimony. Sonrai will disclose such information at the time and in the manner

contemplated by the Federal Rules of Civil Procedure, the Court's Local Rules, the Scheduling Order, or any governing case law.

14. Sonrai objects to the definition of the terms "Sonrai" and/or "You" as overly broad and unduly burdensome to the extent the definition of these terms purports to include persons or entities that are not within Sonrai's complete direction and control. Sonrai further objects to this definition to the extent it includes Sonrai's attorneys and, therefore, causes topics using "Sonrai" to improperly seek information protected by the attorney-client privilege, the work product doctrine, the common interest privilege, joint defense privilege and/or any other applicable privileges or immunities.

15. Sonrai objects to the Requests and instructions to the extent they seek a discussion of what efforts were made to obtain the requested information or documents and further to the extent that information implicates applicable privileges, doctrines, and/or any other exemptions from discovery.

16. Sonrai objects to these Requests to the extent that they require Sonrai to investigate or discover information, materials or documents from third parties that are not within the possession, custody, or control of Sonrai.

17. Without waiving or limiting in any manner any of the foregoing statements, responses or General Objections, but rather incorporating-by-reference each of them into each of the following responses to the extent possible, Sonrai will also state specific objections to the Requests where appropriate, including objections that are not generally applicable to all of the specific Requests. By setting forth such specific objections, Sonrai does not intend to limit or restrict the statements, responses or General Objections set forth above to the extent Sonrai responds to the specific Request. Stated objections are not waived by providing a response.

SPECIFIC OBJECTIONS AND RESPONSES

REQUEST FOR ADMISSION NO. 37:

Admit that a memory apparatus that is “not designed to be plugged and unplugged” is not a portable memory apparatus. *See Micron Tech. Inc. v. Sonrai Memory Ltd.*, No. IPR2023-00904, Paper No. 11 at 9 (P.T.A.B. March 11, 2024).

RESPONSE TO REQUEST FOR ADMISSION NO. 37:

Sonrai incorporates by reference its General Objections set forth above. Sonrai objects to this Request to the extent it seeks information protected by the attorney-client privilege, work product doctrine, common interest privilege, joint defense privilege, or any other applicable privilege or immunity. Sonrai objects to the term “is not a portable memory apparatus” as vague and ambiguous. Sonrai objects that the Request takes the language “not designed to be plugged and unplugged” out of context. Sonrai further objects to this Request as it seeks to improperly shift the burden of proof regarding invalidity alleged by Micron to Sonrai. Sonrai objects to this Request to the extent it seeks legal conclusions. Sonrai objects to the extent this Request calls for expert testimony.

Subject to and without waiving any of the foregoing general or specific objections, Sonrai responds as follows:

Denied.

REQUEST FOR ADMISSION NO. 38:

Admit that a memory apparatus that cannot be “randomly disconnected or uncoupled from a host” is not a portable memory apparatus. *See Micron Tech. Inc. v. Sonrai Memory Ltd.*, No. IPR2023-00904, Paper No. 11 at 11 (P.T.A.B. March 11, 2024).

RESPONSE TO REQUEST FOR ADMISSION NO. 38:

Sonrai incorporates by reference its General Objections set forth above. Sonrai objects to this Request to the extent it seeks information protected by the attorney-client privilege, work

product doctrine, common interest privilege, joint defense privilege, or any other applicable privilege or immunity. Sonrai objects to the term “is not a portable memory apparatus” as vague and ambiguous. Sonrai objects that the Request takes the language “randomly disconnected or uncoupled from a host” out of context. Sonrai further objects to this Request as it seeks to improperly shift the burden of proof regarding invalidity alleged by Micron to Sonrai. Sonrai objects to this Request to the extent it seeks legal conclusions. Sonrai objects to the extent this Request calls for expert testimony.

Subject to and without waiving any of the foregoing general or specific objections, Sonrai responds as follows:

Denied.

REQUEST FOR ADMISSION NO. 39:

Admit that an “internal memory module” is not a portable memory apparatus. *See Micron Tech. Inc. v. Sonrai Memory Ltd.*, No. IPR2023-00904, Paper No. 11 at 37 (P.T.A.B. March 11, 2024).

RESPONSE TO REQUEST FOR ADMISSION NO. 39:

Sonrai incorporates by reference its General Objections set forth above. Sonrai objects to this Request to the extent it seeks information protected by the attorney-client privilege, work product doctrine, common interest privilege, joint defense privilege, or any other applicable privilege or immunity. Sonrai objects to the term “is not a portable memory apparatus” as vague and ambiguous. Sonrai objects that the Request takes the language “internal memory module” out of context. Sonrai further objects to this Request as it seeks to improperly shift the burden of proof regarding invalidity alleged by Micron to Sonrai. Sonrai objects to this Request to the extent it seeks legal conclusions. Sonrai objects to the extent this Request calls for expert testimony.

Subject to and without waiving any of the foregoing general or specific objections, Sonrai responds as follows:

Denied.

REQUEST FOR ADMISSION NO. 40:

Admit that “Based on the totality of [claim 1 of U.S. Patent No. 6,724,241], [claim 1] requires that the loads and consequently the output voltage of the pumping circuit be dynamically selectable.” *See Micron Tech. Inc. v. Sonrai Memory Ltd.*, No. IPR2023-00909, Paper No. 11 at 7 (P.T.A.B. March 11, 2024).

RESPONSE TO REQUEST FOR ADMISSION NO. 40:

Sonrai incorporates by reference its General Objections set forth above. Sonrai objects to this Request to the extent it seeks information protected by the attorney-client privilege, work product doctrine, common interest privilege, joint defense privilege, or any other applicable privilege or immunity. Sonrai objects that the Request takes the recited statement out of context. Sonrai further objects to this Request as it seeks to improperly shift the burden of proof regarding invalidity alleged by Micron to Sonrai. Sonrai objects to this Request to the extent it seeks legal conclusions. Sonrai objects to the extent this Request calls for expert testimony.

Subject to and without waiving any of the foregoing general or specific objections, Sonrai responds as follows:

Admitted that claim 1 of U.S. Patent No. 6,724,241 requires “a plurality of loads selectively coupleable to an output of the pumping circuit, each load associated with a specific pump voltage,” denied otherwise.

REQUEST FOR ADMISSION NO. 41:

Admit that “to meet each of the claims [of U.S. Patent No. 6,724,241], a circuit must be capable of generating multiple output voltages from which a particular output voltage may be selected.” *See Micron Tech. Inc. v. Sonrai Memory Ltd.*, No. IPR2023-00909, Paper No. 10 at 9 (P.T.A.B. March 11, 2024).

RESPONSE TO REQUEST FOR ADMISSION NO. 41:

Sonrai incorporates by reference its General Objections set forth above. Sonrai objects to this Request to the extent it seeks information protected by the attorney-client privilege, work product doctrine, common interest privilege, joint defense privilege, or any other applicable privilege or immunity. Sonrai objects that the Request takes the recited statement out of context. Sonrai further objects to this Request as it seeks to improperly shift the burden of proof regarding invalidity alleged by Micron to Sonrai. Sonrai objects to this Request to the extent it seeks legal conclusions. Sonrai objects to the extent this Request calls for expert testimony.

Subject to and without waiving any of the foregoing general or specific objections, Sonrai responds as follows:

Admitted that claim 1 of U.S. Patent No. 6,724,241 requires “a pumping circuit comprising one or more stages operable to receive a supply voltage and generate a selected one of a plurality of pump voltages” and “a plurality of loads selectively coupleable to an output of the pumping circuit, each load associated with a specific pump voltage,” denied otherwise.

REQUEST FOR ADMISSION NO. 42:

Admit that “[t]he specification [of U.S. Patent No. 6,724,241] makes clear that the selection of a particular load, associated with a specific voltage, is to the exclusion of other loads associated with other specific voltages.” *See Micron Tech. Inc. v. Sonrai Memory Ltd.*, No. IPR2023-00909, Paper No. 11 at 9 (P.T.A.B. March 11, 2024).

RESPONSE TO REQUEST FOR ADMISSION NO. 42:

Sonrai incorporates by reference its General Objections set forth above. Sonrai objects to this Request to the extent it seeks information protected by the attorney-client privilege, work product doctrine, common interest privilege, joint defense privilege, or any other applicable privilege or immunity. Sonrai objects that the Request takes the recited statement out of context. Sonrai further objects to this Request as it seeks to improperly shift the burden of proof regarding

invalidity alleged by Micron to Sonrai. Sonrai objects to this Request to the extent it seeks legal conclusions. Sonrai objects to the extent this Request calls for expert testimony.

Subject to and without waiving any of the foregoing general or specific objections, Sonrai responds as follows:

Admitted that claim 1 of U.S. Patent No. 6,724,241 requires “a load selector means for selectively coupling a load associated with a specific pump voltage to the output of said pumping circuit,” and that the corresponding structure for this “load selector means” operates such that only one load can be selected at a time, denied otherwise.

REQUEST FOR ADMISSION NO. 43:

Admit that none of the license agreements produced by Sonrai are comparable to the hypothetical negotiation that would occur in assessing damages for any Asserted Patent.

RESPONSE TO REQUEST FOR ADMISSION NO. 43:

Sonrai incorporates by reference its General Objections set forth above. Sonrai objects to this Request to the extent it seeks information protected by the attorney-client privilege, work product doctrine, common interest privilege, joint defense privilege, or any other applicable privilege or immunity. Sonrai objects to this Request to the extent it seeks legal conclusions. Sonrai objects to the extent this Request calls for expert testimony.

Subject to and without waiving any of the foregoing general or specific objections, Sonrai responds as follows:

Sonrai lacks sufficient knowledge or information because the Request calls for expert analysis and testimony that is premature. As such, Sonrai can neither admit nor deny this Request at this time.

Dated: April 17, 2024

Respectfully submitted,

By: /s/ Brett E. Cooper

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CERTIFICATE OF SERVICE

I certify that this document is being served upon counsel of record for Defendant on April 17, 2024 via electronic service.

/s/ Drew B. Hollander

Drew B. Hollander