UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

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SEMICONDUCTOR COMPONENTS INDUSTRIES, LLC

AND TEXAS INSTRUMENTS INCORPORATED

Petitioners,

v.

IPR2023-01242 (Patent No. 11,121,222)

IPR2023-01243 (Patent No. 10,510,842)

GREENTHREAD, LLC, IPR2023-01244 (Patent No. 11,121,222)

IPR2024-00263 (Patent No. 11,316,014)

IPR2024-00264 (Patent No. 10,734,481)

Patent Owner. IPR2024-00265 (Patent No. (9,190,502)

IPR2024-00266 (Patent No. 8,421,195)

_____)

CONFIDENTIAL

DEPOSITION OF MATTHEW MURPHY

July 23, 2025

9:58 a.m. Mountain Time

Reported by: Lori J. Goodin, RPR, CRR, RSA,

California CSR #13959

_____

DIGITAL EVIDENCE GROUP

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1 REMOTE DEPOSITION of
2 MATTHEW MURPHY,
3 in the above-titled action, held on Wednesday,
4 July 23, 2025, commencing at approximately 9:58
5 a.m. before Lori J. Goodin, RPR, CRR, RSA,
6 California CSR #13959, Registered Professional
7 Reporter, Certified Realtime Reporter, Realtime
8 Systems Administrator, and Certified Shorthand
9 Reporter, and Notary Public of the State of
10 Florida, State of California, State of Maryland,
11 District of Columbia, and State of Delaware.
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Josh Engle, In-house counsel
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14
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21
22

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7 Second Declaration of 51

8 Matthew Murphy (7/10/25)

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17 (Previously marked exhibits retained by counsel.)

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1 WEDNESDAY, JULY 23, 2025 9:58 A.M.
2 PROCEEDINGS
3
4 MR. HEJNY: Scott Hejny from McKool
5 Smith on behalf of Greenthread LLC and with
6 me are my colleagues Mr. Arvind Jairam and
7 Brandon Merrill.
8 MR. SPEEGLE: This is Mark Speegle
9 from Baker Botts for the petitioner and the
10 witness. And with me from Baker Botts on the
11 line are Roger Fulghum and Ellyar Barazesh.
12 We also have Daniel Anderson on the
13 line who is also co-counsel. And with us
14 today is Josh Engle from onsemi's in-house.
15 ***
16 Whereupon,
17 MATTHEW MURPHY,
18 a witness called for examination, having been
19 first duly sworn, was examined and testified as
20 follows:
21 THE REPORTER: Unless an objection
22 is heard at this time, all parties to this

1 deposition are appearing remotely and have
2 agreed to the witness being sworn in
3 remotely.
4 * * *
5 EXAMINATION
6 BY MR. HEJNY:
7 Q. Good morning, Mr. Murphy.
8 A. Good morning.
9 Q. Have you ever been deposed before?
10 A. No.
11 Q. Is there any reason that you believe
12 you can't give full and accurate testimony here
13 today?
14 A. No.
15 Q. And you understand you are
16 testifying under penalty of perjury?
17 A. Yes.
18 Q. So, although this deposition is
19 being conducted before the patent, the PTAB, you
20 understand that this is just as if you were being
21 deposed for a District Court case, correct?
22 A. I assume so, yes.

1 MR. HEJNY: So, I'm going to ask
2 you, we've got some feedback, and I'm not
3 sure, do we need to go off the record for a
4 minute?
5 MR. SPEEGLE: Off the record.
6 (Recess taken -- 9:59 a.m.)
7 (After recess -- 9:59 a.m.)
8 BY MR. HEJNY:
9 Q. Mr. Murphy, who is present in the
10 room where you are today?
11 A. Mark Speegle and Josh Engel.
12 Q. And is Mr. Engel in-house counsel
13 for Onsemi?
14 A. Yes.
15 Q. Do you have any documents with you
16 in the room, in anticipation of testimony for the
17 deposition?
18 A. Yes. I have three documents in
19 front of me. A declaration, my first
20 declaration, my second declaration, and
21 Exhibit 2048, a small portion of Exhibit 2048.
22 Q. What pages do you have from

1 Exhibit 2048?
2 A. I have what looks like Page 2
3 through 10 of a very small portion of a 370-page
4 document.
5 Q. No, that is great. I think that
6 will be helpful because obviously that is a huge
7 document and it would take some time to upload
8 that into the chat. So, thank you for bringing
9 that today.
10 A. Yes.
11 Q. What did you do to prepare for your
12 deposition today?
13 A. I had a meeting with counsel
14 yesterday.
15 Q. Was that the only meeting that you
16 had in preparation for your deposition?
17 A. And then I re-read my declarations.
18 Q. How long was your meeting yesterday?
19 A. Maybe three hours.
20 Q. And where are you located today?
21 A. Phoenix, Arizona.
22 Q. Are you in onsemi's offices in

1 Phoenix, Arizona?
2 A. Yes.
3 Q. And is that where you were typically
4 based?
5 A. No.
6 Q. Where do you usually work in your
7 employment for onsemi?
8 A. In San Jos , California.
9 Q. But onsemi has an office in Phoenix
10 and that is where you chose to be for the
11 deposition today?
12 A. Yes.
13 Q. And you said that you have in front
14 of you both your first and second declarations,
15 correct?
16 A. Yes.
17 Q. And we are going to be talking for a
18 moment about your second declaration, okay?
19 A. Okay.
20 Q. Did you actually write this
21 declaration?
22 MR. SPEEGLE: Objection to the

1 extent it calls for privileged
2 communications. I instruct the witness not
3 to disclose privileged communications.
4 If you can answer without disclosing
5 communications, counsel, you can.
6 THE WITNESS: It was prepared with
7 Josh.
8 BY MR. HEJNY:
9 Q. And when you say Josh, you mean
10 Mr. Engel?
11 A. Mr. Engel, yes.
12 Q. Is Mr. Engel the only other person
13 that provided help for you when writing this
14 declaration?
15 MR. SPEEGLE: Same objection.
16 Caution the witness not to disclose
17 communications with counsel.
18 But, if you can answer without
19 disclosing confidential attorney/client
20 communications, you can.
21 THE WITNESS: Yes.
22 BY MR. HEJNY:

1 Q. What information and materials did
2 you review when you prepared your second
3 declaration?
4 MR. SPEEGLE: Same objections, same
5 instruction.
6 If you can answer without disclosing
7 it, you can.
8 THE WITNESS: Can you restate the
9 question?
10 BY MR. HEJNY:
11 Q. Sure. What information and
12 materials did you review when you prepared your
13 second declaration?
14 A. I reviewed my first declaration.
15 Q. Well, did you perform any type of
16 investigation when preparing and submitting your
17 second declaration?
18 MR. SPEEGLE: Objection. I think
19 you can answer this question yes or no.
20 But, I would instruct the witness
21 not to disclose anything done at the
22 direction of attorneys.

1 THE WITNESS: Can you restate the
2 question?
3 BY MR. HEJNY:
4 Q. Sure. Did you perform any type of
5 investigation when preparing and submitting your
6 second declaration?
7 MR. SPEEGLE: So, I again, I'm going
8 to instruct the witness not to disclose any
9 work or attorney work product generated at
10 the direction of attorneys.
11 But, if you can answer this question
12 yes or no without disclosing that, you can.
13 THE WITNESS: Yes.
14 BY MR. HEJNY:
15 Q. And what did you do as part of that
16 investigation?
17 MR. SPEEGLE: I'm going to instruct
18 the witness not to answer this question
19 because I think it is calling for privileged
20 information done with attorneys in pursuit of
21 a litigation.
22 So, I instruct the witness not to

1 answer.
2 MR. HEJNY: So, to be clear, you are
3 instructing the witness not to answer the
4 question as to what type of investigation he
5 did when preparing this declaration.
6 Is that my understanding,
7 Mr. Speegle?
8 MR. SPEEGLE: I think you changed
9 the question slightly there. I think if you
10 want to ask him generally about the type of
11 things he did, that is fine.
12 I think if you are asking him
13 directly what counsel asked him to do and
14 what was communicated with counsel, that is
15 going to be privileged.
16 BY MR. HEJNY:
17 Q. Well, Mr. Murphy, you made
18 statements on behalf of onsemi in your second
19 declaration, correct?
20 A. Yes.
21 Q. What did you do to investigate the
22 accuracy of those statements and whether or not

1 they were true and accurate?
2 A. I reviewed Pages 4 through 8 of
3 Exhibit 2048.
4 Q. And what did you do as part of that
5 review of Pages 4 through 8 of Exhibit 2048?
6 A. What did I do? I just read
7 Exhibit 8. Pages 4 through 8.
8 Q. And when you said you read
9 Exhibit 8, I'm assuming that you read
10 Exhibit 2048?
11 A. Yeah, sorry. Exhibit 2048.
12 (Whereupon, previously marked
13 Exhibit 2048,
14 first referral.)
15 BY MR. HEJNY:
16 Q. Okay. So, just so the record is
17 clear, as part of your investigation, you
18 reviewed Pages 4 through 8 of Exhibit 2048,
19 correct?
20 A. That was actually page -- sorry, it
21 is Page 5 of this document, yes, 4 through 8,
22 yes, correct.

1 Q. And when I am referring to Pages 4
2 through 8 of Exhibit 2048, my -- when I was
3 referring to Page 4, I was referring to the
4 actual page number in the document.
5 That is where the confusion is,
6 Mr. Murphy?
7 A. Yes. I have a small portion of the
8 document.
9 Q. Sure. And on Page 4 there begins a
10 list of Intel Atom processors, correct?
11 A. Yes. It is Page 4 that is actually
12 Page 5 of the document that I have.
13 Q. Got it. So, as we move forward just
14 so that we are clear, I will refer to the page
15 numbers at the bottom right-hand corner of the
16 page.
17 A. Perfect.
18 Q. Does that make sense?
19 A. Yep.
20 Q. Okay. Thank you for clearing that
21 up. I appreciate it.
22 So, as part of your investigation,

1 you reviewed Pages 4 through 8 of Exhibit 2048,
2 correct?
3 A. Yes.
4 Q. What did you do next?
5 MR. SPEEGLE: I object to the extent
6 it calls for communications with counsel.
7 If you can answer without disclosing
8 attorney/client communications, you can.
9 THE WITNESS: I then created --
10 actually I did nothing after that. We
11 updated the second declaration and that was
12 it.
13 BY MR. HEJNY:
14 Q. So, the boundaries of the
15 investigation that you performed consisted of
16 reviewing Pages 4 through 8 of Exhibit 2048 and
17 then preparing your declaration; is that correct?
18 A. Sorry. Restate the question.
19 Q. Sure. So the boundaries of the
20 investigation that you performed consisted of
21 reviewing Pages 4 through 8 of Exhibit 2048 and
22 then you prepared the declaration.

1 Is that correct?
2 A. Yes.
3 Q. Did you speak with anyone else at
4 onsemi about the products listed on Pages 4
5 through 8 of Exhibit 2048?
6 A. Okay. One more -- restate the
7 question.
8 Q. Sure. Did you speak with anyone
9 else at onsemi about the products listed on
10 Pages 4 through 8 of Exhibit 2048?
11 A. No.
12 Q. Did you speak with anyone at Intel
13 about the onsemi products -- strike that.
14 Did you speak with anyone at Intel
15 about the products listed on Pages 4 through 8 of
16 Exhibit 2048?
17 A. No.
18 Q. How long did it take you to complete
19 your investigation? And by investigation I mean
20 your review of Pages 4 through 8 of Exhibit 2048.
21 A. Not very long. I -- I also looked
22 at a view of what we had shipped. But, that is

1 all that I did.
2 Q. And about how long did that entire
3 process take?
4 A. Not long.
5 Q. Less than an hour?
6 A. Yes.
7 Q. And when you said that you looked at
8 a view of what onsemi had shipped, what do you
9 mean by that?
10 A. Just a -- a ship list of what we had
11 shipped to Intel.
12 Q. And, why did you look at that list?
13 A. Just to confirm what I had already
14 suspected.
15 Q. And what had you already suspected?
16 A. That we shipped none of these parts
17 listed on Pages 5, 6, 7.
18 Q. And that is Pages 5, 6, 7 of the
19 Exhibit 2048?
20 A. Correct.
21 Q. So, you did an investigation to see
22 if you had actually shipped any of the Intel

1 processors listed on Pages 5 through 7 of
2 Exhibit 2048 to Intel?
3 A. Yes.
4 Q. Did that really even require a
5 review of Pages 5 through 8 of Exhibit 2048?
6 MR. SPEEGLE: Objection, form.
7 THE WITNESS: Can you restate the
8 question?
9 BY MR. HEJNY:
10 Q. Did that really even require you to
11 review Pages 5 through 8 of Exhibit 2048?
12 MR. SPEEGLE: Objection, form.
13 THE WITNESS: No.
14 BY MR. HEJNY:
15 Q. Because you know for a fact that
16 onsemi doesn't actually sell Intel processors
17 back to Intel, correct?
18 A. That is correct.
19 Q. And onsemi doesn't sell Intel
20 processors to anyone, correct?
21 A. Correct.
22 Q. And now I'm going to ask you to pick

1 up your second declaration and let me know when
2 you have it in front of you.
3 A. Okay.
4 Q. And I'm going to talk about
5 Paragraph 7 which is on Page 3 of your
6 declaration. Let me know when you are there.
7 A. Yes.
8 Q. After the first sentence you make a
9 couple of additional statements regarding
10 confirmations that you are making on behalf of
11 onsemi.
12 Do you see that?
13 A. Yes.
14 Q. And you state, "I can confirm that
15 onsemi does not currently and has never sold any
16 of the Intel accused products on Pages 4
17 through 8 of Exhibit 2048.
18 Do you see that?
19 A. Yes.
20 Q. And in the next statement you say
21 that "I can also confirm that onsemi does not
22 currently and has never sold any component of the

1 Intel accused products on Pages 4 through 8 of
2 Exhibit 2048."
3 Do you see that?
4 A. Yes.
5 Q. What do you mean by any component?
6 A. We don't sell any part of an accused
7 product and any piece of that component.
8 Q. What do you mean --
9 A. There is no --
10 Q. -- sorry --
11 A. There is no piece to sell.
12 Q. Okay. Sorry. I apologize for
13 interrupting you. I will try not to do that. It
14 will make it easier for the court reporter, too.
15 So, I will follow up with a
16 question.
17 What do you mean by any part of an
18 accused product and any piece of that component?
19 A. So, we don't sell any of the accused
20 products and certainly not any component of any
21 of those products.
22 Q. And again I hate to keep parsing

1 your words.
2 But what do you mean by any
3 component.
4 Do you mean any, any part of the
5 processor?
6 A. Yes. Certainly not any piece of the
7 processor.
8 Q. Did you do any investigation to
9 determine whether or not any of those Intel
10 processors on Pages 4 through 8 of Exhibit 2048
11 include any components sold by onsemi?
12 A. Can you restate the question for
13 clarity?
14 Q. Sure. What type, what types of
15 products does onsemi sell to Intel?
16 A. We sell very few products to Intel.
17 Most of the products that we sell are likely
18 standard components that other customers would
19 buy.
20 Q. And what very few products do you
21 sell to Intel?
22 A. I'm not the best to answer that

1 question in detail. I have people on my team
2 that would be better positioned.
3 But, likely MOSFETs and discrete
4 transistors and diodes.
5 Q. Did you consult with any of these
6 people about what products onsemi sells directly
7 to Intel in the preparation of your declaration?
8 A. No.
9 Q. Why not?
10 A. I didn't need to.
11 Q. Why didn't you need to?
12 A. When I looked at the parts list in
13 Exhibit 2048, it confirmed my understanding that
14 we didn't ship any of those CPUs to Intel.
15 Q. So, you didn't think it was
16 necessary to investigate whether or not any of
17 those CPUs listed in Exhibit 2048 include an
18 onsemi product?
19 A. None of the products listed in
20 Exhibit 2048 are onsemi products. It didn't need
21 any further investigation.
22 Q. Well, do you know whether any of

1 those Intel products listed in Exhibit 2048
2 include onsemi products?
3 A. I am not so sure I understand the
4 question.
5 Q. Well, there is a list of Intel
6 processors on Pages 4 through 8 of Exhibit 2048.
7 Correct?
8 A. Yes.
9 Q. Did you do any investigation to
10 determine whether any of those Intel processors
11 include a part made or sold by onsemi?
12 A. None of the parts we sell would be
13 part of a Intel CPU.
14 Q. So, as you sit here today,
15 testifying under penalty of perjury, did you do
16 any investigation to determine whether any of the
17 Intel processors shown on Pages 4 through 8 of
18 Exhibit 2048 include a product made or sold by
19 onsemi?
20 Yes or no.
21 MR. SPEEGLE: Objection, form.
22 THE WITNESS: I did no other further

1 investigation.
2 BY MR. HEJNY:
3 Q. Did you contact Intel to find out if
4 any of the processors listed on Pages 4 through 8
5 of Exhibit 2048 include a product made or sold by
6 onsemi?
7 A. No.
8 Q. Again, you didn't feel that was
9 necessary?
10 A. No.
11 Q. And you mentioned earlier that some
12 of the parts that are made by onsemi are standard
13 components that other customers may buy.
14 Do you recall that?
15 A. Yes.
16 Q. What types of standard components
17 are you referring to?
18 A. Those are the ones that I had
19 mentioned. MOSFETs or discrete transistors and
20 diodes.
21 I don't have the details. I am not
22 the direct day-to-day salesperson.

1 Q. And you didn't speak with anyone
2 in-house at onsemi about whether or not they knew
3 whether any of the products listed on Pages 4
4 through 8 of Exhibit 2048 include onsemi parts,
5 correct?
6 A. Are you asking me to refer to my
7 declaration?
8 Q. Well, I'm just asking as part of
9 your investigation, did you speak with anyone
10 in-house at onsemi about whether or not they knew
11 whether any of the Intel products listed on
12 Pages 4 through 8 of Exhibit 2048 include onsemi
13 parts?
14 MR. SPEEGLE: I'm going to object to
15 the extent it calls for privileged
16 communications.
17 I think you can answer this question
18 yes or no.
19 But, I'm going to caution the
20 witness not to disclose the content of any
21 communications with counsel.
22 THE WITNESS: No.

1 BY MR. HEJNY:
2 Q. It is true, isn't it, Mr. Murphy,
3 that onsemi makes more than just MOSFETs and
4 discrete transistors and diodes, correct?
5 MR. SPEEGLE: Objection, form.
6 THE WITNESS: Yes, that is true.
7 BY MR. HEJNY:
8 Q. In fact, onsemi offers custom
9 products and solutions to some customers,
10 correct?
11 MR. SPEEGLE: Objection, form.
12 THE WITNESS: To some customers,
13 yes.
14 BY MR. HEJNY:
15 Q. What products other than MOSFETs and
16 discrete transistors and diodes are sold directly
17 to Intel?
18 MR. SPEEGLE: Objection, form.
19 THE WITNESS: I don't know the
20 detailed part list. That is, I have people
21 in my organization that would have those
22 details.

1 BY MR. HEJNY:
2 Q. So, you don't know what other parts
3 and products other than MOSFETs and discrete
4 transistors and diodes are sold directly to
5 Intel?
6 MR. SPEEGLE: Objection, form.
7 THE WITNESS: We don't sell many
8 products directly to Intel.
9 BY MR. HEJNY:
10 Q. What do you mean by many?
11 A. We don't sell -- they are a very,
12 very small direct customer.
13 Q. Do you know whether Intel purchases
14 onsemi products from a reseller for use in their
15 products?
16 MR. SPEEGLE: Objection, form.
17 THE WITNESS: I don't know.
18 BY MR. HEJNY:
19 Q. Did you contact Intel to find out if
20 they purchased onsemi parts or products for use
21 in the processors listed on Pages 4 through 8 of
22 Exhibit 2048?

1 A. Can you restate the question?
2 Q. Sure. Did you contact Intel to find
3 out if they purchased onsemi parts or products
4 for use in the processors listed on Pages 4
5 through 8 of Exhibit 2048?
6 A. No.
7 Q. Does onsemi have any subsidiaries or
8 affiliates that are resellers?
9 MR. SPEEGLE: Objection, form.
10 THE WITNESS: Any -- I want to make
11 sure I hear the question correctly.
12 BY MR. HEJNY:
13 Q. Sure. So, you testified some time
14 ago that onsemi provides standard components that
15 other customers may want to buy, correct?
16 A. Yes.
17 Q. Who are those other customers?
18 MR. SPEEGLE: Objection, scope.
19 THE WITNESS: Are you referring to
20 something in my declaration?
21 BY MR. HEJNY:
22 Q. I'm just referring to your prior

1 testimony.
2 You testified that onsemi
3 manufactures some standard components that other
4 customers may want to buy, outside of Intel.
5 Do you recall that testimony?
6 MR. SPEEGLE: Objection, form.
7 Objection, scope. You can still answer.
8 THE WITNESS: Yes. Other customers
9 could buy those parts.
10 BY MR. HEJNY:
11 Q. And who are those other customers?
12 A. Could be any customer.
13 Q. Could you give me an example?
14 MR. SPEEGLE: Objection, scope.
15 [redacted]
16 [redacted]
17 [redacted]
18 [redacted]
19 MR. SPEEGLE: And real quick, I
20 think we do need to designate the transcript
21 as confidential if we are getting into
22 customer identities.

1 MR. HEJNY: That is fine. No
2 objection.
3 BY MR. HEJNY:
4 Q. And I'm circling back to a question
5 that I asked earlier.
6 Does onsemi own, in whole or part,
7 any entities that resell its products?
8 MR. SPEEGLE: Objection, scope. And
9 objection, foundation.
10 THE WITNESS: No.
11 BY MR. HEJNY:
12 Q. So, as you sit here testifying
13 today, Mr. Murphy, under penalty of perjury, can
14 you tell me definitively whether any of the
15 products listed on Pages 4 through 8 of
16 Exhibit 2048 include an onsemi part or product?
17 A. I'm going to ask you to re-ask the
18 question to make sure I'm very clear on your
19 question.
20 Q. As you sit here today testifying
21 under penalty of perjury, can you tell me
22 definitively whether any of the products listed

1 on Pages 4 through 8 of Exhibit 2048, include an
2 onsemi part or product?
3 A. I can confirm they do not.
4 Q. You can confirm that all of the
5 Intel processors listed on Pages 4 through 8 of
6 Exhibit 2048 do not include an onsemi chip,
7 MOSFET or transistor element?
8 A. Yes. I can confirm that.
9 Q. And what did you do to confirm your
10 understanding?
11 A. My understanding, I have been at
12 onsemi for a long time. I -- they wouldn't.
13 That doesn't exist in my understanding of our
14 business with Intel.
15 Q. So, Intel products don't include any
16 parts made or sold by onsemi?
17 MR. SPEEGLE: Objection, form.
18 THE WITNESS: Correct.
19 BY MR. HEJNY:
20 Q. And when I say parts, you understand
21 that I mean parts broader than just any component
22 of the Intel accused products as you state in

1 your declaration, correct?
2 MR. SPEEGLE: Objection, form.
3 THE WITNESS: Make sure you ask the
4 question a bit more clearly so I understand.
5 BY MR. HEJNY:
6 Q. We talked a little bit earlier about
7 components of the Intel accused products.
8 Do you recall that?
9 A. Uh-huh.
10 Q. And refresh my recollection again as
11 to what you state is a component of an Intel
12 accused product as you stated in your
13 declaration.
14 A. I can confirm that onsemi does not
15 currently and has never sold any of the Intel
16 accused products.
17 And I can confirm that onsemi does
18 not currently and has never sold any component of
19 the Intel accused products.
20 Q. And again, what is a component of an
21 Intel accused product as you used that phrase in
22 your -- sorry, strike that.

1 Again, what is a component of an
2 Intel accused product as you used that phrase in
3 your declaration?
4 A. No part of an Intel component; I
5 don't sell an Intel component.
6 Q. So you are saying in your
7 declaration that you don't sell an Intel
8 component back to Intel?
9 A. No.
10 Q. So, just to be clear is that -- are
11 you confirming or denying the statement --
12 A. I do not sell --
13 MR. SPEEGLE: Objection, form. You
14 can answer.
15 THE WITNESS: I do not sell any of
16 these accused products or any component of
17 those products to Intel.
18 BY MR. HEJNY:
19 Q. And again when we say component, are
20 you referring to a Intel manufactured component?
21 MR. SPEEGLE: Objection, form.
22 THE WITNESS: Yes. Any component,

1 yes.
2 BY MR. HEJNY:
3 Q. So, just to be clear, when you make
4 this statement in your declaration, you first say
5 that onsemi does not and has never sold any of
6 the Intel accused products, correct?
7 A. Yes.
8 Q. And when you refer to onsemi never
9 having sold any component of the Intel accused
10 products, you are referring to the fact that
11 onsemi has never sold a component of an Intel
12 accused product back to Intel.
13 Correct?
14 A. Yes.
15 Q. What is your current role at onsemi?
16 A. Vice President of America Sales.
17 Q. And what do you do in your current
18 role as Vice President of America Sales?
19 A. I manage a sales team.
20 Q. Do you regularly confer with
21 customers?
22 A. Yes.

1 Q. And, to be clear, Intel is a
2 customer of onsemi, correct?
3 A. Yes. A small customer.
4 Q. And do you regularly confer with
5 Intel?
6 A. No.
7 Q. Is there someone on your sales team
8 that regularly confers with Intel?
9 A. What does regularly refer to?
10 Q. Let me re-ask the question. Is
11 there someone on your sales team responsible for
12 communicating with Intel?
13 A. Yes.
14 Q. How many people are on your sales
15 team?
16 A. Is that relevant to my declaration?
17 Q. It is just relevant as to your
18 background and your competency to testify on your
19 declaration.
20 A. Okay. About 100.
21 Q. And how long have you been employed
22 at onsemi?

1 A. Since 1998 or 1999.
2 Q. Congratulations. That is a long
3 time. I mean, you don't see that much anymore?
4 A. I'm a unicorn.
5 Q. Have you held other roles at onsemi?
6 A. Yes.
7 Q. Did you -- have you always been a
8 part of the sales team?
9 A. No.
10 Q. Did you ever work in engineering?
11 A. No.
12 Q. What did you do before you joined
13 sales?
14 A. I was an IT program manager.
15 Q. Why were you selected to respond to
16 this discovery request and to prepare this
17 declaration, do you know?
18 MR. SPEEGLE: Objection to the
19 extent this calls for attorney/client
20 communications.
21 And also, objection, form. I think
22 it is compound.

1 Scott, if you want to re-ask just
2 the foundation question, I can let him answer
3 yes or no on that.
4 BY MR. HEJNY:
5 Q. Do you know why you were selected to
6 respond to this discovery request?
7 MR. SPEEGLE: Again, same objection.
8 And you can answer yes or no.
9 THE WITNESS: No.
10 BY MR. HEJNY:
11 Q. Have you reviewed any of the
12 exhibits submitted by Greenthread in these IPR
13 proceedings outside of Exhibit 2048?
14 A. No.
15 Q. Have you reviewed any of the
16 briefing in these IPR proceedings that was
17 submitted by Greenthread?
18 A. No. Not anything that is outside of
19 Exhibit 2048, no.
20 Q. Did you review any of the briefings
21 submitted by onsemi as part of these IPR
22 proceedings?

1 A. No.
2 Q. Did counsel provide you with a copy
3 of the PTAB Board order outlining the scope of
4 additional discovery in the case?
5 MR. SPEEGLE: I'm going to object to
6 the extent it calls for privileged
7 communication.
8 But, you can answer that question
9 yes or no.
10 THE WITNESS: No.
11 BY MR. HEJNY:
12 Q. Does onsemi manufacture any custom
13 products for Intel?
14 A. I don't know the answer to that
15 question.
16 Q. Does onsemi manufacture, in addition
17 to the basic components you mentioned before,
18 ASIC chips?
19 MR. SPEEGLE: Objection, scope.
20 Objection, form.
21 THE WITNESS: Do we manufacture --
22 can you make sure I understand the question?

1 BY MR. HEJNY:
2 Q. Sure. Does onsemi manufacture ASICs
3 for Intel?
4 A. I don't know the answer to that
5 question.
6 Q. Does onsemi --
7 Have you heard of an SOC, a System
8 on Chip?
9 A. Yes.
10 Q. Does onsemi manufacture Systems on
11 Chips for Intel?
12 A. We don't sell those types of
13 components to Intel.
14 So --
15 Q. And when you say those types of
16 products, do you mean SOCs, Systems on Chips?
17 A. Yes.
18 Q. And have you heard of a SIP, a
19 System in Package?
20 A. Yes, I am familiar with the term.
21 Q. Does onsemi sell SIPs to Intel?
22 A. I don't think we sell those products

1 to Intel.
2 Q. Did you investigate whether you sell
3 ASICs or SIPs to Intel as part of your
4 investigation when preparing your declaration?
5 A. No.
6 Q. What is an Integrated Passive
7 Device?
8 A. I am not the best person to answer
9 that question.
10 Q. Do you know whether onsemi sells
11 Integrated Passive Devices to Intel?
12 A. Could be. I'm not the best person
13 to answer that question.
14 Q. Did you do any investigation to
15 determine whether onsemi sells integrated passive
16 devices to Intel as part of your investigation in
17 preparing your declaration?
18 A. No.
19 Q. When onsemi sells products directly
20 to Intel, are there Terms and Conditions
21 associated with those sales?
22 A. Yes.

1 Q. And that is common practice in the
2 industry, right? Whenever onsemi makes a sale of
3 a product to a customer, there are always Terms
4 and Conditions associated with those sales,
5 right?
6 A. Yes. I think that is fair.
7 Q. So, if onsemi sold any products to
8 Intel, there would be documents showing those
9 standards and Terms and Conditions of sale,
10 right?
11 MR. SPEEGLE: Objection to form.
12 Objection, scope.
13 THE WITNESS: Yes, I think there is.
14 BY MR. HEJNY:
15 Q. Did you try to locate any documents
16 including those Terms and Conditions of sales
17 made to Intel as part of your investigation?
18 A. No.
19 Q. Did you ask anybody on your team to
20 try and find documents showing Terms and
21 Conditions of sales to Intel as part of your
22 investigation?

1 A. No.
2 Q. Is there a standard set of Terms and
3 Conditions for onsemi sales that correspond to
4 sales to any entity, whether it be Intel or any
5 other onsemi customer?
6 MR. SPEEGLE: Objection, scope.
7 THE WITNESS: That version of our Ts
8 and Cs are available on our website.
9 BY MR. HEJNY:
10 Q. And, that version of your Ts and Cs,
11 by Ts and Cs, you are referring to Terms and
12 Conditions of sale?
13 A. Yes.
14 Q. And those Terms and Conditions of
15 sale apply to each and every one of onsemi's
16 customers?
17 A. Unless there is some other
18 agreement, yes.
19 Q. Are you aware as to whether or not
20 there is a different agreement in place for sales
21 made by onsemi to Intel?
22 A. No.

1 Q. Did you ask anyone on your team when
2 you were preparing your declaration as to whether
3 or not Intel had a special set of Terms and
4 Conditions related to sales?
5 A. No.
6 Q. Does onsemi ever collaborate with
7 Intel on special projects?
8 MR. SPEEGLE: Objection, form.
9 THE WITNESS: Can you restate the
10 question?
11 BY MR. HEJNY:
12 Q. Sure. Does onsemi ever collaborate
13 with Intel on special projects?
14 MR. SPEEGLE: Objection, form.
15 THE WITNESS: Yes.
16 BY MR. HEJNY:
17 Q. Can you give me an example of a
18 special project that has taken place between
19 onsemi and Intel?
20 MR. SPEEGLE: Objection, form. And
21 scope.
22 THE WITNESS: I am typically not in

1 those discussions.
2 BY MR. HEJNY:
3 Q. So, you are aware of those projects
4 but you don't know the details?
5 MR. SPEEGLE: Object to form and
6 scope.
7 THE WITNESS: Yes.
8 BY MR. HEJNY:
9 Q. As part of those projects, do you
10 know if there is any special discussions with
11 Intel to ensure compatibility between onsemi
12 products and Intel products?
13 MR. SPEEGLE: Objection, form.
14 THE WITNESS: I am not the right
15 person to answer that question.
16 BY MR. HEJNY:
17 Q. Do the Terms and Conditions of sale
18 for onsemi products indemnify customers for
19 patent infringement?
20 MR. SPEEGLE: Objection. Form and
21 scope.
22 THE WITNESS: I don't know the

1 details of the latest version of Ts and Cs.
2 BY MR. HEJNY:
3 Q. And I know you testify in your
4 declaration that onsemi didn't receive an
5 indemnity request from Intel in connection with
6 the Intel litigation.
7 Do you recall that?
8 A. If you are referring to --
9 What piece of my declaration are you
10 referring to?
11 Q. Sure. Give me just a second.
12 A. Okay.
13 Q. This begins at Paragraph 10. It is
14 the bottom of Page 4, top of Page 5.
15 A. Okay.
16 Q. And you state that I have been
17 informed -- this is the last sentence on Page 4
18 and I will begin reading there.
19 "I have been informed that the Intel
20 litigation was dismissed on April 24th, 2023,
21 because Intel never submitted an indemnification
22 request or otherwise requested onsemi's

1 assistance with the Intel litigation."
2 Do you see that statement?
3 A. Yes.
4 Q. So, it is your understanding that
5 Intel never submitted an indemnity request in
6 connection with what you refer to in your
7 declaration as the Intel litigation, correct?
8 A. Can you restate that comment one
9 more time?
10 Q. Sure, no problem. So, your
11 understanding, as you state in your declaration,
12 is that onsemi never received an indemn -- now I
13 can't talk -- strike that.
14 So, your understanding based on your
15 declaration is that Intel never received an
16 indemn -- okay.
17 One more time -- see, I can't even
18 ask this question it is so confusing, I
19 apologize, Mr. Murphy.
20 It is your understanding that onsemi
21 never received an indemnification request from
22 Intel as part of the Intel litigation, correct?

1 A. One more time so I don't
2 misunderstand the question.
3 Q. Sure. You consulted with the Legal
4 Department about indemnification requests,
5 correct?
6 A. Yes.
7 Q. Did you ask them whether Intel had
8 ever submitted an indemnification request to
9 onsemi in connection with the Intel litigation?
10 A. I didn't, no.
11 Q. Okay. To the best of your
12 knowledge, do you know whether onsemi has ever
13 received an indemnification request in connection
14 with an ongoing litigation?
15 A. No.
16 Q. Did you ask the Legal Department
17 whether onsemi had ever received an
18 indemnification request in connection with any
19 other litigation?
20 A. No.
21 Q. Let's take a short break and go off
22 the record.

1 MR. SPEEGLE: Sure. Off the record.
2 (Recess taken -- 10:51 a.m.)
3 (After recess -- 11:00 a.m.)
4 BY MR. HEJNY:
5 Q. Welcome back, Mr. Murphy.
6 Did you speak to your counsel during
7 the break about any substantive matters related
8 to your testimony?
9 A. No.
10 (Whereupon, previously marked Second
11 Declaration of Matthew Murphy,
12 first referral.)
13 BY MR. HEJNY:
14 Q. Now, turn back to your second
15 declaration, if you would. And I'm looking at
16 Paragraph 8 which begins at the bottom of Page 3
17 of your second declaration.
18 Let me know when you are there.
19 A. Okay.
20 Q. And the first sentence of
21 Paragraph 8 says that "From time to time my team
22 and I communicate with employees of Intel

1 regarding issues related to onsemi products."
2 Do you see that?
3 A. Yes.
4 Q. Did you communicate directly with
5 employees from Intel regarding issues related to
6 onsemi products?
7 A. No. Not regularly.
8 Q. Does someone on your team
9 communicate with employees for Intel regarding
10 issues related to onsemi products?
11 A. Yes. Could. Yes.
12 Q. And what sort of issues are
13 discussed in those communications with Intel?
14 A. It could vary in content, I guess.
15 Q. Well, you put in your declaration --
16 I mean, what do you mean by issues related to
17 onsemi products?
18 A. Quality issues, market conditions,
19 technical questions.
20 Q. Anything else?
21 A. I'm sure the content, I don't
22 regularly know. But, yes, I'm sure there is

1 discussions.
2 Q. And what do you mean by quality
3 issues?
4 A. The part doesn't work.
5 Q. And what types of parts are we
6 talking about?
7 A. A part that -- the parts that they
8 buy from onsemi.
9 Q. Do you know specifically what parts
10 Intel buys from onsemi?
11 A. No.
12 Q. What about market conditions? What
13 sort of market conditions or what -- what is the
14 subject matter of a market conditions discussion?
15 MR. SPEEGLE: Objection, form.
16 THE WITNESS: That is a fairly
17 straightforward question on how we see the
18 market relative to cycles in our industry.
19 BY MR. HEJNY:
20 Q. Was it related to pricing, things
21 like that?
22 MR. SPEEGLE: Object to form.

1 THE WITNESS: I would say general
2 pricing trends, potentially.
3 But, not -- the content and those
4 discussions, I don't know the answer to that
5 question.
6 But could be pricing trends, sure.
7 BY MR. HEJNY:
8 Q. Do you know how many, in terms of
9 quantity, of onsemi products that onsemi sells to
10 Intel?
11 A. No.
12 Q. What about technical questions, what
13 sort of technical questions could arise in the
14 context of communications with Intel?
15 A. I am not the right person to answer
16 that question.
17 Q. Would it relate to whether or not
18 onsemi products are compatible with Intel systems
19 and products?
20 MR. SPEEGLE: Objection to form.
21 THE WITNESS: Again, I don't know
22 the context of those types of discussions.

1 If those discussions are even happening, I
2 don't know.
3 BY MR. HEJNY:
4 Q. And you testified earlier that
5 onsemi also sells to third-party resellers.
6 Do you recall that?
7 MR. SPEEGLE: Objection, form.
8 THE WITNESS: I don't think that was
9 the question that you asked.
10 BY MR. HEJNY:
11 Q. Well then, I will ask this question
12 now.
13 Are you aware of the fact that
14 onsemi sells products to third-party distributors
15 and resellers?
16 A. That is a different question, so I
17 want to make sure I understood it correctly.
18 Can you restate the question?
19 Q. Sure. Does onsemi sell products to
20 third-party distributors?
21 A. Yes.
22 Q. Do those third-party distributors

1 then sell onsemi products to Intel?
2 A. I don't know. I don't know the
3 answer.
4 Q. Did you do any investigation as part
5 of the preparation of your declaration to
6 determine whether third-party distributors sell
7 onsemi products to Intel?
8 A. No.
9 Q. Does onsemi have any affiliates that
10 resell its products?
11 MR. SPEEGLE: Objection, form.
12 THE WITNESS: Well, I -- affiliates,
13 not that I'm aware of, no.
14 BY MR. HEJNY:
15 Q. Does onsemi have any subsidiaries
16 that resell its products?
17 MR. SPEEGLE: Objection, form and
18 scope.
19 THE WITNESS: Yeah, I think it is
20 the subsidiaries. It could be Semiconductor
21 Component Industries; it is a subsidiary of
22 onsemi.

1 BY MR. HEJNY:
2 Q. So, Semiconductor Industries is a
3 subsidiary of onsemi?
4 A. No, Semiconductor Components
5 Industries is a subsidiary of onsemi.
6 Q. So, Semicomponents Industries is a
7 subsidiary of onsemi.
8 MR. SPEEGLE: Objection, form.
9 THE WITNESS: Semiconductor
10 Components Industries, LLC is a subsidiary of
11 onsemi.
12 BY MR. HEJNY:
13 Q. Great, thank you.
14 A. But, I -- can you restate the
15 original question on this to make sure I answered
16 it?
17 Q. Sure. I will ask you another
18 question.
19 First of all, Semicomponents
20 Industries, LLC, do you refer to that company as
21 SCI?
22 MR. SPEEGLE: Objection, form.

1 THE WITNESS: I don't know. I don't
2 refer to it.
3 BY MR. HEJNY:
4 Q. Is semiconductor -- is Semiconductor
5 Components Industries, LLC a reseller of onsemi
6 products?
7 MR. SPEEGLE: Objection, form.
8 THE WITNESS: I -- I don't know that
9 answer from a very technical nature as onsemi
10 we are not selling.
11 So, I don't know the specifics of
12 the legal entities structure of the company.
13 BY MR. HEJNY:
14 Q. So you said, "I don't know that
15 answer from a very technical nature as onsemi, we
16 are not selling."
17 What do you mean by that --
18 A. How the legal entity structure, I am
19 not familiar with that.
20 I know it is an entity but how it
21 actually transacts, I can't --
22 Q. Did you do any investigation as to

1 Semiconductor Components Industries, LLC and how
2 that company functions in connection with the
3 preparation of your declaration?
4 A. No.
5 MR. SPEEGLE: Objection, form.
6 BY MR. HEJNY:
7 Q. And just to be clear, Semiconductor
8 Components Industries, LLC is a subsidiary of
9 onsemi, right?
10 MR. SPEEGLE: Objection, form and
11 scope.
12 THE WITNESS: Yes, I think that is
13 correct.
14 BY MR. HEJNY:
15 Q. And onsemi sells products directly,
16 correct?
17 MR. SPEEGLE: Objection, form and
18 scope.
19 THE WITNESS: Sells products
20 directly?
21 BY MR. HEJNY:
22 Q. Yes.

1 A. Yes.
2 Q. And then does Semiconductor
3 Components Industries, LLC also sell onsemi
4 products?
5 A. I don't know the answer to that
6 question.
7 Q. Did you do any investigation as to
8 whether or not Semiconductor Components
9 Industries, LLC sells onsemi products to Intel as
10 part of your investigation?
11 MR. SPEEGLE: Objection, form.
12 THE WITNESS: Can you restate?
13 BY MR. HEJNY:
14 Q. Sure. Did you do any -- strike
15 that, let me start over.
16 Did you do any investigation as to
17 whether or not Semiconductor Components
18 Industries, LLC sells onsemi products to Intel as
19 part of your investigation?
20 MR. SPEEGLE: Objection, form.
21 THE WITNESS: No.
22 BY MR. HEJNY:

1 Q. So as you sit here today, you don't
2 know whether or not Semiconductor Components
3 Industries, LLC, a subsidiary of onsemi, sells
4 products to Intel, correct?
5 MR. SPEEGLE: Objection, form and
6 scope.
7 THE WITNESS: No.
8 BY MR. HEJNY:
9 Q. If you could turn to Exhibit 2048.
10 And go to Page 5.
11 Let me know when you are there.
12 A. I am there.
13 Q. And there is a heading called Intel
14 Atom Processors, do you see that?
15 A. Yes.
16 Q. And the first processor listed is
17 Intel Atom C2308.
18 Do you see that?
19 A. Yes.
20 Q. Do you know whether or not the Intel
21 Atom C2308 processor includes any parts or
22 elements manufactured and sold by onsemi or

1 Semiconductor Components Industries, LLC?
2 A. One more time.
3 Q. Do you know whether or not the Intel
4 Atom C2308 processor includes any parts or
5 elements whatsoever manufactured and sold by
6 onsemi or Semiconductor Components Industries,
7 LLC?
8 A. No.
9 Q. Do you know whether the Intel Atom
10 C2316 processor includes any parts or elements
11 whatsoever manufactured and sold by onsemi or
12 Semiconductor Components Industries, LLC?
13 A. No.
14 Q. And would your answer be the same
15 for the rest of the processors that are listed on
16 Pages 5 through 8 of Exhibit 2048?
17 A. Yes.
18 Q. What is an OEM customer, Mr. Murphy?
19 MR. SPEEGLE: Objection. Form and
20 scope.
21 THE WITNESS: Original Equipment
22 Manufacturer.

1 BY MR. HEJNY:
2 Q. And does onsemi have OEM customers?
3 MR. SPEEGLE: Objection, form and
4 scope.
5 THE WITNESS: Is it in reference to
6 my declaration?
7 BY MR. HEJNY:
8 Q. Yes. I am setting predicate for
9 some questions.
10 And in my question was, does onsemi
11 have OEM customers?
12 MR. SPEEGLE: Same objection.
13 THE WITNESS: Yes.
14 BY MR. HEJNY:
15 Q. Is Intel one of onsemi's OEM
16 customers?
17 A. Yes.
18 Q. Is Intel one of onsemi's top OEM
19 customers?
20 A. No.
21 Q. Is Intel an OEM customer of
22 Semiconductor Components Industries, LLC?

1 MR. SPEEGLE: Objection, form.
2 THE WITNESS: I don't know.
3 BY MR. HEJNY:
4 Q. So you didn't do any investigation
5 whatsoever into Semiconductor Components
6 Industries, LLC in connection with your
7 investigation and preparation of your
8 declaration.
9 Is that correct?
10 A. No.
11 Q. Do products sold by Semiconductor
12 Components Industries, LLC -- strike that.
13 Are products sold by Semiconductor
14 Components Industries, LLC subject to the same
15 Terms and Conditions of sale as products sold by
16 onsemi?
17 MR. SPEEGLE: Objection, form and
18 scope.
19 THE WITNESS: I am not the right
20 person to answer that.
21 BY MR. HEJNY:
22 Q. Who would be the right person to

1 answer that question?
2 A. Someone in the Legal Department.
3 Q. Is it difficult to find and access
4 documents indicating the Terms and Conditions of
5 sale of onsemi products to Intel?
6 MR. SPEEGLE: Objection. Form and
7 scope.
8 THE WITNESS: I don't know what
9 difficult means in this context.
10 BY MR. HEJNY:
11 Q. Would you know how to find documents
12 showing the Terms and Conditions of sales for
13 Intel products that are sold to Intel by onsemi?
14 A. Myself, no.
15 Q. You said in your declaration you
16 talked to someone in the Legal Department.
17 Would they be able to point you in
18 the right direction?
19 A. Yes, I would think so.
20 Q. Did you ask anyone in the Legal
21 Department to collect any documents showing
22 onsemi Terms and Conditions of sales to products

1 sold to Intel as part of your investigation?
2 MR. SPEEGLE: I'm going to caution
3 the witness not to disclose communications
4 with counsel.
5 But you can answer that question yes
6 or no.
7 THE WITNESS: No, I did not.
8 BY MR. HEJNY:
9 Q. Does onsemi take intellectual
10 property matters seriously?
11 A. Yes.
12 Q. Are you aware of whether onsemi has
13 any patents of its own?
14 MR. SPEEGLE: Objection, scope.
15 THE WITNESS: Yes.
16 BY MR. HEJNY:
17 Q. Is onsemi careful to ensure that its
18 products as sold don't infringe any existing
19 intellectual property?
20 MR. SPEEGLE: Objection, scope.
21 THE WITNESS: Yes.
22 BY MR. HEJNY:

1 Q. When did you first become aware of
2 these IPR proceedings for which you submitted
3 your first and second declarations?
4 A. I think it was April of this year.
5 (Whereupon, previously marked
6 First Declaration of Matthew T.
7 Murphy,
8 first referral.)
9 BY MR. HEJNY:
10 Q. So, your first declaration -- and
11 you have that in front of you, correct?
12 A. Yes.
13 Q. And that declaration is entitled
14 Declaration of Matthew T. Murphy, correct?
15 A. Yes.
16 Q. It is dated May 27, 2025?
17 A. Yes.
18 Q. And, your testimony is that the
19 first time you became aware of these IPR
20 proceedings and the need for you to submit a
21 declaration was in April of 2025?
22 A. No.

1 Q. Well, when did you first become
2 aware of these IPR proceedings?
3 A. I believe it was sometime in April.
4 Late April.
5 Q. Okay. So the first time you became
6 aware of these IPR proceedings was in April,
7 2025, correct?
8 A. No, I don't -- sorry.
9 I don't think I knew that those
10 proceedings were taking place in April.
11 Q. So, when did you first become aware
12 of the IPR proceedings?
13 A. Probably sometime between April and
14 May.
15 Q. Okay. Sometime between April and
16 the date on your first declaration?
17 A. Yes. I think that is -- yes.
18 Q. So, before that April to May 2025
19 time frame, you were never contacted by anybody
20 in-house at onsemi or by outside counsel
21 regarding these IPR proceedings that are listed
22 on the front of your second declaration of

1 Matthew Murphy dated July 10th, 2025?
2 MR. SPEEGLE: I'm going to caution
3 the witness not to disclose communications,
4 counsel.
5 But, you can answer that question
6 yes or no.
7 THE WITNESS: Restate the question
8 so I make sure I answer it with the right
9 answer.
10 BY MR. HEJNY:
11 Q. Sure. So you testified that you
12 first became aware of these IPR proceedings that
13 are listed on the front of the Second Declaration
14 of Matthew Murphy in the April to May 2025 time
15 frame, correct?
16 A. Correct.
17 Q. And prior to that time frame, you
18 were never contacted by anyone in-house at onsemi
19 or by outside counsel regarding these IPR
20 proceedings, correct?
21 MR. SPEEGLE: Same instruction. You
22 can answer yes or no.

1 THE WITNESS: I was not made aware.
2 BY MR. HEJNY:
3 Q. I think we covered this before, but
4 I just want to ask another question.
5 Did you ever review onsemi's
6 arguments objecting to additional discovery in
7 this case?
8 A. No.
9 Q. And have you ever seen an order
10 issued by the PTAB ordering post-remand discovery
11 in this case?
12 A. No.
13 MR. HEJNY: Let's take a quick
14 break. I think I am getting close. We will
15 be back at 12:30 central.
16 (Recess taken -- 11:25 a.m.)
17 (After recess -- 11:30 a.m.)
18 (Whereupon, previously marked
19 Greenthread Exhibit 2010
20 first referral.)
21 BY MR. HEJNY:
22 Q. Mr. Murphy, an exhibit has been

1 uploaded in the chat of the video conference.
2 This is Exhibit 2010.
3 Let me know if you can locate that
4 and download that document.
5 A. Give me a second.
6 MR. SPEEGLE: For the record, this
7 is Exhibit 2010 in IPR 2023-01242; is that
8 right?
9 MR. HEJNY: Correct.
10 THE WITNESS: Okay. I have it open.
11 BY MR. HEJNY:
12 Q. And the documents that you are
13 looking at, at the top it says onsemi Standard
14 Terms and Conditions of Sale.
15 Do you see that?
16 A. Yes.
17 Q. And if you could take a moment to
18 scroll through that document, there is some
19 highlighting on Page 3 that was added as part of
20 this case, so you can ignore that.
21 But, otherwise please scroll through
22 the document and let me know when you have time,

1 when you are finished.
2 A. Am I looking for something?
3 Q. I'm just looking for you to confirm
4 that these are onsemi standard Terms and
5 Conditions of sale that we discussed earlier.
6 MR. SPEEGLE: Objection, form and
7 scope.
8 THE WITNESS: It looks like a
9 version. Whether it is the current version,
10 I can't comment.
11 BY MR. HEJNY:
12 Q. Is the current version available on
13 onsemi's website?
14 MR. SPEEGLE: Objection, form and
15 scope.
16 THE WITNESS: Yes, I believe so. I
17 haven't looked recently. But, yes, I believe
18 so.
19 BY MR. HEJNY:
20 Q. And if you go back to Page 1 under
21 Item 1, it is labeled Product and Sales Terms.
22 Do you see that?

1 A. Yes.
2 Q. And, the last sentence of the second
3 paragraph in that section says, "These Terms and
4 Conditions are also available at www.onsemi.com."
5 Do you see that?
6 A. Yes.
7 Q. So, when you testified earlier that
8 these standard Terms and Conditions of sale
9 related to onsemi sales are available on the
10 website, is that what you were referring to?
11 A. Yes.
12 Q. And if you will turn to Page 3,
13 Section 7 is titled Patent, Mask Work Right and
14 Copyright Identification, do you see that?
15 A. Yes.
16 MR. SPEEGLE: Objection, scope.
17 THE WITNESS: And, Sub-element B
18 which is the first sentence of the second
19 full paragraph of Section 7 states that
20 "onsemi agrees to defend any claim, suit or
21 proceeding asserted against buyer based upon
22 a claim that any product(s), purchased

1 hereunder, excluding software, directly
2 infringes any patent."
3 Do you see that?
4 MR. SPEEGLE: Objection. Scope and
5 form.
6 THE WITNESS: Yes, I see it.
7 BY MR. HEJNY:
8 Q. And do you understand that to be an
9 offer by onsemi to indemnify a buyer against
10 claims of patent infringement?
11 MR. SPEEGLE: Objection, scope and
12 form.
13 THE WITNESS: I am not a lawyer.
14 BY MR. HEJNY:
15 Q. So, you don't know whether or not
16 Section 7B relates to onsemi's agreement to
17 indemnify a buyer based upon a claim of patent
18 infringement of a product purchased from onsemi?
19 MR. SPEEGLE: Objection, form and
20 scope.
21 THE WITNESS: Yes, that is -- that
22 looks to be the correct understanding.

1 BY MR. HEJNY:
2 Q. And just going back, earlier we
3 talked about onsemi and Semiconductor Components
4 Industries, LLC.
5 Do you recall that discussion?
6 A. Yes.
7 Q. And, Semiconductor Components
8 Industries, LLC is a subsidiary of onsemi,
9 correct?
10 MR. SPEEGLE: Objection, form and
11 scope.
12 THE WITNESS: Yes, I believe that to
13 be the case.
14 BY MR. HEJNY:
15 Q. Does onsemi control the operations
16 of Semiconductor Components Industries, LLC?
17 MR. SPEEGLE: Objection. Form and
18 scope.
19 THE WITNESS: I am not the right
20 person to answer that question.
21 BY MR. HEJNY:
22 Q. So, you don't know?

1 A. I'm not the right person to answer
2 that question.
3 Q. So, you don't know, as you sit here
4 today testifying under oath, whether or not
5 onsemi controls the operations of Semiconductor
6 Components Industries, LLC?
7 A. I don't know what the word controls
8 means.
9 Q. Does Semiconductor Components
10 Industries, LLC operate under the direction of
11 onsemi?
12 MR. SPEEGLE: Objection, form and
13 scope.
14 THE WITNESS: I am not the right
15 person to answer that question.
16 BY MR. HEJNY:
17 Q. So, you just don't know?
18 MR. SPEEGLE: Same objections.
19 THE WITNESS: No.
20 MR. HEJNY: I pass the witness.
21 MR. SPEEGLE: Hey Scott, let's take
22 a ten-minute break, is that okay?

1 MR. HEJNY: Sure.
2 (Recess taken -- 11:38 a.m.)
3 (After recess -- 11:57 a.m.)
4 EXAMINATION
5 BY MR. SPEEGLE:
6 Q. Mr. Murphy, are you an attorney?
7 A. No, I am not.
8 Q. And, are you familiar with the
9 specific legal roles for the subsidiaries and
10 affiliates operating under the onsemi name?
11 A. No.
12 Q. When you were asked questions about
13 a company called Semiconductor Components
14 Industries, LLC, do you remember that?
15 A. Yes.
16 Q. And I want to direct you to your
17 second declaration, if you can turn to
18 Paragraph 3 of that declaration.
19 A. Yes.
20 Q. Can you read the first sentence of
21 that Paragraph 3 for me.
22 A. "I am currently the Vice President

1 of Sales, Americas, Semiconductor Components
2 Industries, LLC (onsemi)."
3 Q. So, am I right that in your
4 declaration there is a relationship between the
5 word onsemi and Semiconductor Components
6 Industries, LLC?
7 MR. HEJNY: Objection, form.
8 Leading.
9 BY MR. SPEEGLE:
10 Q. I will ask it again.
11 Is there a relationship between the
12 term onsemi and Semiconductor Components
13 Industries, LLC in that sentence of your
14 declaration?
15 A. Yes.
16 Q. And what does onsemi in that
17 sentence refer to?
18 A. I am not an expert on the financial
19 setup of the company or a lawyer to properly
20 answer that question.
21 Q. Do you have an understanding of how
22 the term onsemi was used in relationship to

1 Semiconductor Components Industries, LLC in your
2 declaration?
3 A. Can you restate the question?
4 Q. How was the term onsemi defined in
5 that first sentence of Paragraph 3 in your
6 declaration?
7 A. So, as the Vice President of Sales,
8 I don't differentiate. I work for onsemi.
9 Q. Okay. So in your day-to-day role,
10 you don't refer to Semiconductor Components
11 Industries, LLC?
12 A. No, I do not.
13 Q. And so in your declaration when you
14 are referring to onsemi, does that include
15 Semiconductor Components Industries, LLC?
16 MR. HEJNY: Object to form.
17 Leading.
18 BY MR. SPEEGLE:
19 Q. You can still answer.
20 A. Yes.
21 Q. And in your deposition before
22 Semiconductor Components Industries, LLC was

1 introduced, when you were using the term
2 onsemi -- do you remember that?
3 A. Yes, I am sure it was somewhat --
4 yes.
5 Q. And were you making a distinction
6 between onsemi and Semiconductor Components
7 Industries, LLC at that point in your deposition?
8 A. No.
9 MR. SPEEGLE: Object to form.
10 BY MR. SPEEGLE:
11 Q. And in any of your work, do you ever
12 make a distinction between onsemi and
13 Semiconductor Components LLC?
14 MR. SPEEGLE: Object to form.
15 THE WITNESS: No, I do not.
16 BY MR. SPEEGLE:
17 Q. Do you still have the Exhibit 210
18 that counsel questioned you about earlier?
19 A. Yes.
20 MR. HEJNY: Are you referring
21 to 2010?
22 MR. SPEEGLE: Yes, I'm sorry.

1 Exhibit 2010 that was asked about earlier.
2 BY MR. SPEEGLE:
3 Q. Do you have that in front of you?
4 A. Yes.
5 Q. All right. And do you see the very
6 first sentence of Section 1 of the Terms and
7 Conditions in Exhibit 2010?
8 A. Yes.
9 Q. And, can you read that first
10 sentence after the bolded caption?
11 A. "The Buyer agrees to purchase the
12 Semiconductor Components Industries, LLC and its
13 affiliates and subsidiaries (collectively
14 onsemi), agree to sell, products, ('Product(s)')
15 under the Terms and Conditions contained in the
16 Standard Terms and Conditions of Sales (these
17 Terms and Conditions.)
18 "The actual seller applicable to and
19 obligated under a particular purchase order may
20 vary by location."
21 Q. And you understand that these Terms
22 and Conditions include Semiconductor Components

1 Industries?
2 A. Yes.
3 Q. And am I right that they are
4 collectively part of the definition of onsemi?
5 MR. HEJNY: Object to form.
6 THE WITNESS: Yes.
7 BY MR. SPEEGLE:
8 Q. Now, I want to turn to Exhibit 2048.
9 A. Okay.
10 Q. And can you turn to what is the
11 bottom right-hand paginated Page 5 and it starts
12 with the list of Intel Atom processors. Do you
13 see that page?
14 A. Yes.
15 Q. Okay. You were asked questions in
16 your deposition about whether onsemi -- or,
17 sorry, strike that.
18 Am I remembering right that you were
19 asked questions in your deposition about whether
20 the Intel Atom C2308 product includes any
21 elements or parts manufactured by either onsemi
22 or Semiconductor Components Industries, LLC?

1 MR. SPEEGLE: Object to form.
2 THE WITNESS: Yes, I recall that.
3 BY MR. SPEEGLE:
4 Q. Okay. And, in your declaration when
5 you referred to -- well, strike that.
6 Do you know whether the Intel Atom
7 C2308 in fact included onsemi or Semiconductor
8 Components Industries, LLC parts or elements?
9 MR. HEJNY: Object to form.
10 THE WITNESS: I know that it does
11 not include components of onsemi or
12 Semiconductor Components Industries, LLC.
13 BY MR. SPEEGLE:
14 Q. And you answered that question
15 differently when you were asked about that
16 before, right?
17 MR. HEJNY: Object to form.
18 Leading.
19 BY MR. SPEEGLE:
20 Q. I will ask a different one, I can
21 rephrase.
22 Did you answer that question

1 differently during the prior testimony?
2 A. I don't believe I did. But if there
3 was a misunderstanding, then I need to correct
4 it.
5 Q. Okay. So, for all of the products
6 listed on Exhibit 2048, Pages 4 through 8, do you
7 know whether these Intel CPUs and Intel flash
8 memory include parts or elements manufactured by
9 either Semiconductor Components Industries, LLC
10 or onsemi.
11 A. I know that they do not.
12 Q. Okay. I think you were asked
13 questions about whether there was an
14 indemnification demand to onsemi.
15 Do you remember those questions?
16 A. Yes.
17 Q. And to make the record clear, I am
18 using onsemi as it is used in your declaration,
19 is that okay?
20 A. Yes.
21 Q. And do you know if there was ever an
22 indemnification demand to onsemi from Intel

1 related to the Intel litigation?
2 A. Yes. And I would refer to
3 Paragraph 8.
4 "Intel has never submitted to me or
5 my team an indemnification request regarding the
6 Intel accused products.
7 "In fact, to my knowledge, Intel has
8 never tendered a patent infringement
9 indemnification request to onsemi."
10 Q. I believe you were also asked a
11 question about whether you asked onsemi's Legal
12 Department about indemnification requests from
13 Intel.
14 Do you remember that question?
15 A. Yes.
16 MR. HEJNY: Object to form.
17 BY MR. SPEEGLE:
18 Q. And, do you recall how you answered
19 that question?
20 A. The specifics, I think I had said no
21 I did not ask.
22 Q. Can you explain that answer in

1 connection with what is in Paragraph 8 of your
2 declaration?
3 A. I did not ask if we had been --
4 received an indemnification request.
5 It wasn't part of my discussion or
6 the way I answered it or the way I was --
7 I never asked the question. I was
8 told that that is the case.
9 Q. And when you say that is the case,
10 can you explain that a little bit?
11 A. I never asked the question because I
12 didn't know that I needed to ask the question.
13 Q. And, were you nonetheless informed
14 by the Legal Department about whether Intel
15 submitted a indemnity request?
16 MR. SPEEGLE: Objection, form.
17 Leading.
18 THE WITNESS: Yeah, and then the
19 last sentence of Section 8, "I have also
20 consulted with onsemi's Legal Department,
21 onsemi's Legal Department has confirmed to me
22 that onsemi's Legal Department has never

1 received an indemnification request from
2 Intel regarding any issue including for
3 anything related to the Intel accused
4 products."
5 BY MR. SPEEGLE:
6 Q. Okay. Let's go back to the
7 Exhibit 2048 list of Intel accused products.
8 Do you have an understanding of what
9 these Intel Atom processors include physically?
10 A. No.
11 Q. Do you have an understanding of what
12 a CPU is generally?
13 A. To some degree.
14 Q. Okay. And just for the sake of
15 clarifying the record, I want to clarify that I'm
16 going to ask this question with the term onsemi
17 including all of the subsidiaries and affiliates
18 that use the onsemi d/b/a.
19 And did onsemi ever sell to Intel
20 any of the accused Intel products set out in
21 Exhibit 2048?
22 A. No.

1 Q. And again using that same
2 understanding of onsemi, I'm going to ask, did
3 onsemi ever sell to Intel any part or element or
4 component of the accused Intel product set out in
5 Exhibit 2048?
6 A. No.
7 MR. HEJNY: Object to form.
8 MR. SPEEGLE: Okay. I will pass the
9 witness.
10 FURTHER EXAMINATION
11 BY MR. HEJNY:
12 Q. Mr. Murphy, do you have Exhibit 2048
13 in front of you?
14 A. Yes, I do.
15 Q. Have you ever seen a parts list for
16 an Intel Atom C2308 processor?
17 A. No.
18 Q. Have you ever seen a parts list for
19 an Intel Atom C2316 processor?
20 A. No.
21 Q. Have you seen a parts list for any
22 of the processors listed on Pages 5 through 7 of

1 Exhibit 2048?
2 A. Maybe I am -- can you restate the
3 question? I want to make sure I'm clear.
4 Q. Sure. Have you ever seen a parts
5 list for any of the processors listed on Pages 5,
6 6, or 7 of Exhibit 2048?
7 A. I have not seen -- this is the list
8 I am familiar with.
9 Q. Did you ask Intel for a parts list
10 for each of these processors as part of your
11 investigation?
12 A. No.
13 Q. Did you contact Intel at all as part
14 of your investigation?
15 A. No.
16 Q. You can set that aside. Let's look
17 at Exhibit 2010.
18 That is the onsemi Standard Terms
19 and Conditions of Sale document that we discussed
20 before.
21 A. Yes.
22 Q. Let me know when you are ready.

1 Okay?
2 A. Yes.
3 Q. So, on the first line it says, "The
4 Buyer agrees to purchase, and Semiconductor
5 Components Industries, LLC (SCI) and its
6 affiliates and subsidiaries (collectively
7 onsemi)."
8 Do you see that?
9 A. Yes.
10 Q. Who are the affiliates and
11 subsidiaries of Semiconductor Components
12 Industries, LLC?
13 MR. SPEEGLE: Objection. Scope and
14 form.
15 THE WITNESS: I am not familiar. I
16 am not a lawyer or in the Finance Department
17 to be an expert on the legal structure of the
18 company.
19 BY MR. HEJNY:
20 Q. Did you do any investigation in
21 preparation of your declaration to determine
22 whether any of the affiliates and subsidiaries

1 listed in Exhibit 2010, Section 1, make or sell
2 any parts or components and sell them to Intel?
3 MR. SPEEGLE: Objection. Form and
4 scope.
5 THE WITNESS: Please repeat the
6 question.
7 BY MR. HEJNY:
8 Q. Did you do any investigation in
9 preparation of your declaration to determine
10 whether any of the affiliates and subsidiaries,
11 as listed in Line 1 of Exhibit 2010, make or sell
12 any parts or components and then sell them to
13 Intel?
14 MR. SPEEGLE: Objection. Form and
15 scope.
16 THE WITNESS: Yes.
17 BY MR. HEJNY:
18 Q. Well then, who are the affiliates
19 and subsidiaries, Mr. Murphy?
20 MR. SPEEGLE: Objection, form and
21 scope.
22 THE WITNESS: I don't look at it as

1 affiliate or a subsidiary.
2 BY MR. HEJNY:
3 Q. So, I don't understand. So, the
4 line states that Semiconductor Components
5 Industries, LLC (SCI) --
6 So, it is a defined entity in the
7 standard Terms and Conditions of sale agreement,
8 do you agree with that statement?
9 A. Yes.
10 MR. SPEEGLE: Objection. Form and
11 scope.
12 BY MR. HEJNY:
13 Q. And then it goes on to say and its
14 affiliates and subsidiaries.
15 Do you see that?
16 A. Yes.
17 Q. Who are the affiliates and
18 subsidiaries of Semiconductor Components
19 Industries, LLC?
20 MR. SPEEGLE: Objection. Form and
21 scope.
22 THE WITNESS: It is a part of

1 onsemi, collectively onsemi.
2 BY MR. HEJNY:
3 Q. That is not the question I'm asking.
4 Who are the affiliates and subsidiaries as
5 defined in this legal document of Semiconductor
6 Components Industries, LLC?
7 MR. SPEEGLE: Objection, foundation.
8 Objection, scope.
9 THE WITNESS: I am not the right
10 person to answer that question.
11 BY MR. HEJNY:
12 Q. Did you ask the Legal Department who
13 are the affiliates and subsidiaries of
14 Semiconductor Components Industries, LLC when you
15 were preparing your declaration?
16 A. No.
17 Q. Did you make any investigation
18 whatsoever into who the affiliates and
19 subsidiaries of Semiconductor Components
20 Industries, LLC are, as part of your
21 investigation?
22 MR. SPEEGLE: Objection. Form and

1 scope.
2 THE WITNESS: No.
3 BY MR. HEJNY:
4 Q. You can set that aside. And if you
5 could turn to your second declaration.
6 And counsel asked you some questions
7 about Paragraph 8.
8 So, if you could turn to Paragraph 8
9 which -- the questions I will ask begin on,
10 relate to Pages 3 and 4 of your declaration.
11 A. Okay.
12 Q. You said you just didn't ask a
13 question about indemnity; is that correct?
14 A. I didn't ask a question.
15 Q. But in your declaration you state
16 that you consulted with onsemi's Legal Department
17 and onsemi's Legal Department confirmed that
18 onsemi's Legal Department has never received an
19 indemnification request.
20 Do you see that?
21 A. Yes.
22 Q. So, if you didn't ask the question,

1 how could you have consulted with onsemi's Legal
2 Department?
3 A. I didn't ask. They asked me.
4 Q. What did they ask you?
5 A. "I have also consulted with onsemi's
6 Legal Department and onsemi's Legal Department
7 has confirmed to me that onsemi's Legal
8 Department has never received an indemnification
9 request from Intel regarding any issue including
10 for anything related to the Intel accused
11 products."
12 Q. That is not the question I'm asking.
13 It is a bit of a conundrum and I will ask a
14 question.
15 You said you never questioned
16 onsemi's Legal Department about an indemnity
17 request.
18 Do you recall that?
19 MR. SPEEGLE: Objection, misstates
20 testimony.
21 THE WITNESS: Is that a question?
22 BY MR. HEJNY:

1 Q. Yes. You said you never asked the
2 question of onsemi's Legal Department about an
3 indemnity request.
4 Do you remember that testimony?
5 A. I didn't ask the question.
6 Q. Well then, how could you have
7 consulted with onsemi's Legal Department and
8 received confirmation about no receipt of an
9 indemnity request if you didn't ask the question?
10 A. They told me.
11 Q. So, was this part of the Legal
12 Department's contribution to your declaration?
13 MR. SPEEGLE: Objection, form.
14 Objection to the extent it calls for
15 attorney/client communications and the
16 preparation of the declaration.
17 But, if you can answer without
18 describing the preparation of the
19 declaration, you can.
20 THE WITNESS: I have also -- "If a
21 third party accused Intel of patent
22 infringement based upon a product supplied by

1 onsemi, I would expect that Intel would raise
2 this issue with me, and Intel never -- has
3 never done so.
4 "Intel has never submitted to me or
5 my team an indemnification request regarding
6 the Intel Accused Products. In fact, to my
7 knowledge Intel has never tendered a patent
8 infringement indemnification request to
9 onsemi.
10 "I have also consulted with onsemi's
11 Legal Department, and onsemi's Legal
12 Department has confirmed to me that onsemi's
13 Legal Department has never received an
14 indemnification request from Intel regarding
15 any issue, including for anything related to
16 the Intel Accused Products."
17 BY MR. HEJNY:
18 Q. And you are just reading from your
19 declaration, correct?
20 A. Yes.
21 Q. But you testified earlier that you
22 don't speak to Intel, right? It is somebody on

1 your team.
2 So, why would you have received a
3 communication regarding an indemnity request?
4 A. If there was an issue like that,
5 it -- I would expect it would normally come to
6 me.
7 Q. And why would you expect that?
8 A. Because we take those issues
9 seriously.
10 Q. But why would it have come to you?
11 Why wouldn't it have come to your team member
12 that works with Intel?
13 A. Yes, it would have come to likely my
14 team, and my team would have escalated to me or
15 they would have come to me directly.
16 Q. Did you ask your team member that
17 works with Intel to reach out to Intel as part of
18 your investigation that you conducted in
19 preparing your declaration?
20 A. No.
21 MR. HEJNY: I have no further
22 questions.

1 FURTHER EXAMINATION
2 BY MR. SPEEGLE:
3 Q. Mr. Hejny asked you a couple of
4 questions, we were talking about this language in
5 Paragraph 8 about the Legal Department confirming
6 the absence of an indemnification request from
7 Intel.
8 Do you remember that?
9 A. Yes.
10 Q. And, did you have a meeting with the
11 Legal Department related to that subject matter?
12 A. Yes.
13 Q. And did the Legal Department convey
14 to you what is stated in your declaration?
15 MR. HEJNY: Object to form.
16 Leading.
17 THE WITNESS: Yes.
18 MR. SPEEGLE: Okay. No further
19 questions.
20 MR. HEJNY: I think we are done.
21 Off the record.
22 MR. SPEEGLE: Off the record.

1 (Whereupon, signature not having been waived,
2 the deposition suspended at 12:23 p.m.)
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1 CERTIFICATE OF NOTARY
2
3 I, LORI J. GOODIN, RPR, CRR,
4 CA CSR # 13959 the Notary for this deposition, do
5 hereby certify that the witness whose testimony
6 appears in the foregoing deposition was sworn by
7 me; that I am neither counsel for, related to,
8 nor employed by any of the parties to the action
9 in which this deposition was taken; and, further,
10 that I am not a relative or employee of any
attorney or counsel employed by the parties
11 hereto, or financially or otherwise interested
in the outcome of this action.
12
13 Lori J. Goodin
LORI J. GOODIN, RPR, CLR, CRR
Notary Public in and for:
14
15 STATE OF FLORIDA, COUNTY OF SARASOTA
Notary Commission Number: GG987804
16 My Commission expires: May 12, 2028
17 STATE OF CALIFORNIA, CA CSR# 13959
My Commission expires: February 22, 2027
18 STATE OF MARYLAND, COUNTY OF ANNE ARUNDEL
19 My Commission expires: August 2, 2025
20 DISTRICT OF COLUMBIA, WASHINGTON DC
My Commission expires: June 1, 2026
21 STATE OF DELAWARE, COUNTY OF KENT
22 My Commission expires: September 9, 2025

1 Matthew Murphy, c/o
2 BAKER BOTTS
3 401 South 1st Street, Suite 1300
4 Austin, Texas 78704
5
6 Case: Semiconductor Components Industries, LLC et al. v. Greenthread, LLC
7 Date of deposition: July 23, 2025
8 Deponent: Matthew Murphy
9
10
11 Please be advised that the transcript in the above
12 referenced matter is now complete and ready for signature.
The deponent may come to this office to sign the transcript,
13 a copy may be purchased for the witness to review and sign,
or the deponent and/or counsel may waive the option of
14 signing. Please advise us of the option selected.
Please forward the errata sheet and the original signed
15 signature page to counsel noticing the deposition, noting the
16 applicable time period allowed for such by the governing
17 Rules of Procedure. If you have any questions, please do
18 not hesitate to call our office at (202)-232-0646.
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6 SIGNATURE PAGE
7 Case: Semiconductor Components Industries, LLC et al. v. Greenthread, LLC
8 Witness Name: Matthew Murphy
9 Deposition Date: July 23, 2025
10
11
12 I do hereby acknowledge that I have read
13 and examined the foregoing pages
14 of the transcript of my deposition and that:
15 (Check appropriate box):
16 ( ) The same is a true, correct and
complete transcription of the answers given by
17 me to the questions therein recorded.
(x) Except for the changes noted in the
18 attached Errata Sheet, the same is a true,
correct and complete transcription of the
19 answers given by me to the questions therein
recorded.
20 July 31, 2025 _____
DATE WITNESS SIGNATURE
21 _____ _____
22 DATE NOTARY

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5

6 ERRATA SHEET

7

8 Case: Semiconductor Components Industries, LLC et al. v. Greenthread, LLC

9 Witness Name: Matthew Murphy

10 Deposition Date: July 23, 2025

11

Page No.	Line No.	Change
62	8	"No" to "I know it does not." I misheard or misunderstood this question, as explained later at 83:6-84:11, and as illustrated by my prior answers confirming that onsemi does not sell Intel CPUs or components of Intel CPUs, for example at 23:5-21 and 26:9-13 ("None of the parts we sell would be parts of a Intel CPU")
62	13	"No" to "I know it does not." I misheard or misunderstood this question, as explained later at 83:6-84:11, and as illustrated by my prior answers confirming that onsemi does not sell Intel CPUs or components of Intel CPUs, for example at 23:5-21 and 26:9-13 ("None of the parts we sell would be parts of a Intel CPU")

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21 July 31, 2025

22 Signature Date

A
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