

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SEMICONDUCTOR COMPONENTS INDUSTRIES, LLC and
TEXAS INSTRUMENTS INCORPORATED,
Petitioner

v.

GREENTHREAD, LLC,
Patent Owner

IPR2023-01242 (Patent 11,121,222 B2)
IPR2023-01243 (Patent 10,510,842 B2)
IPR2023-01244 (Patent 11,121,222 B2)¹²

SECOND DECLARATION OF MATTHEW MURPHY

¹ Texas Instruments Incorporated has been joined as a petitioner to the proceedings identified in this heading based on petitions filed in IPR2024-00672, IPR2024-00673, and IPR2024-00674.

² The word-for-word identical paper is filed in each proceeding identified in the heading.

I, Matthew Murphy, declare as follows:

1. My name is Matthew Murphy.
2. I am over 21 years of age and otherwise competent to make this Declaration. I make this Declaration based on facts and matters within my own knowledge and on information provided to me by others. If called as a witness, I could and would competently testify to the matters set forth herein.
3. I am currently the Vice President of Sales, Americas, at Semiconductor Components Industries, LLC (“onsemi”). I have held this position for approximately the last four years. Overall, I have been employed by onsemi and its predecessor company in various positions for more than twenty-five years, and I have held various supply chain, sales, and account management roles during that period.
4. Because of my current role and because of my long history in sales-related roles at onsemi, I am familiar with onsemi’s product portfolio and sales of onsemi’s products to a wide variety of companies, including whether any particular onsemi product has been sold to Intel Corporation (“Intel”) in particular.
5. I have been informed that onsemi is involved in proceedings at the U.S. Patent and Trademark Office and that the proceedings are known as an *inter partes* review proceedings (“IPRs”). It is my understanding that the Patent Owner in this proceeding is Greenthread, LLC (“Greenthread”).

6. I have been informed that Greenthread sued Intel for patent infringement and that the case was assigned Case Nos. 6:22-cv-105 and 6:22-cv-01293 in the Western District of Texas and Case No. 3:22-cv-02001 in the District of Oregon. I will refer to these lawsuits as the “Intel Litigation.” I have reviewed pages 4-8 of a document labeled “Greenthread Ex. 2048,” which I have been informed lists products accused of patent infringement in the Intel Litigation. I have been informed that this document is Exhibit 2048 in the IPRs.

7. I reviewed the portion of Exhibit 2048 under the heading “Intel Accused Products.” I can confirm that onsemi does not currently and has never sold any of the Intel Accused Products on pages 4-8 of Exhibit 2048. I can also confirm that onsemi does not currently and has never sold any component of the Intel Accused Products on pages 4-8 of Exhibit 2048. I can also confirm that onsemi has never sold any of the Intel Accused Products or any component of the Intel Accused Products to Intel. Because onsemi has never sold any of the Intel Accused Products or any component of any of the Intel Accused Products to Intel (or to anyone else), I can confirm that onsemi has never signed and does not possess any customer agreements, sales agreements, indemnification agreements, or any other documents concerning the sale of the Intel Accused Products.

8. From time to time, my team and I communicate with employees of Intel regarding issues related to onsemi products. If a third party accused Intel of patent

infringement based on a product supplied by onsemi, I would expect that Intel would raise that with issue with me, and Intel has never done so. Intel has never submitted to me or my team an indemnification request regarding the Intel Accused Products; in fact, to my knowledge, Intel has never tendered a patent infringement indemnification request to onsemi. I have also consulted with onsemi's legal department, and onsemi's legal department has confirmed to me that onsemi's legal department has never received an indemnification request from Intel regarding any issue, including for anything related to the Intel Accused Products.

9. I understand that onsemi has been ordered to provide documents or a declaration identifying the time by which onsemi became aware of the Intel Litigation. I have also been informed that Greenthread filed its lawsuit against onsemi on April 21, 2023. I was not personally aware of the Intel Litigation before April 21, 2023, and to the best of my personal knowledge and understanding, no one at onsemi was aware of the Intel Litigation before April 21, 2023. To confirm my understanding, I consulted with onsemi's legal department, and onsemi's legal department confirmed to me that the earliest that onsemi became aware of the Intel Litigation was on April 21, 2023, when Greenthread sued onsemi.

10. I also understand that onsemi has been ordered to provide documents or a declaration concerning whether onsemi was in a position to control or actually controlled Intel's defense of the Intel Litigation. I have been informed that the Intel

Litigation was dismissed on April 24, 2023. Because Intel never submitted an indemnification request or otherwise requested onsemi's assistance with the Intel Litigation, and because onsemi only became aware of the Intel Litigation a few days before the Intel Litigation was dismissed, to the best of my personal knowledge and understanding, onsemi was not in a position to control and did not actually control any aspect of Intel's defense of the Intel Litigation. To confirm my understanding, I consulted with onsemi's legal department, and onsemi's legal department confirmed to me that onsemi was not in a position to control and did not actually control any aspect of Intel's defense of the Intel Litigation.

11. I reserve the right to supplement my opinions to the extent it is deemed necessary.

12. I hereby declare that all statements made herein of my own knowledge are true and that all statements made on information and belief are believed to be true; and further that these statements were made with the knowledge that willful false statements and the like so made are punishable by fine or imprisonment, or both, under Section 1001 of Title 18 of the United States Code and that such willful false statements may jeopardize the results of the proceedings. I declare under penalty of perjury that the foregoing is true and correct.

Date: July 10, 2025

Respectfully submitted,

A handwritten signature in black ink, appearing to be 'Matthew Murphy', written over a horizontal line.

Matthew Murphy