

From: [Fulghum, Roger](#)
To: [Nicholas T. Matich](#)
Cc: [DL Greenthread, LLC v. onsemi](#); [Speegle, Mark](#); [Greenthread-OnSemi-MS](#)
Subject: RE: District Court Documents and IPR2023-01242, IPR2023-01243, IPR2023-01244
Date: Monday, October 16, 2023 4:51:37 PM
Attachments: [image001.png](#)
[image002.png](#)

Nick,

onsemi is reviewing the reviewing discovery requests served in the Delaware lawsuit, and we will respond as required by the Federal Rules. We also expect to receive your request for additional discovery today and will respond to that motion as required by the Board's instruction from Friday of last week.

Thanks, Roger.

From: Nicholas T. Matich <nmatich@McKoolSmith.com>
Sent: Saturday, October 14, 2023 1:35 PM
To: Fulghum, Roger <Roger.Fulghum@BakerBotts.com>
Cc: DL Greenthread, LLC v. onsemi <dlgreenthreadvonsemi@BakerBotts.com>; Speegle, Mark <mark.speegle@bakerbotts.com>; Greenthread-OnSemi-MS <Greenthread-OnSemi-MS@mckoolsmith.com>
Subject: District Court Documents and IPR2023-01242, IPR2023-01243, IPR2023-01244

[EXTERNAL EMAIL]

Roger,

The documents and information we have requested at the PTAB are also responsive to our discovery requests in the district court. Specifically, Common Interrogatory 2 and RFP Nos. 40, 41, 42 call for (among other things) On Semi to provide its agreements with Intel and [REDACTED]. Further, Common Interrogatory Nos. 4 and 6 require On Semi to state (among other things) whether it contends that sales to Intel and Sony are licensed. RFP No. 21 requires On Semi to produce (among other things) documents relevant to that contention.

We assume based on OnSemi's refusal to produce the information we requested in connection with the PTAB proceeding that it will also refuse to produce the information in district court. If On Semi is taking a different position with respect to the district court, please let us know and explain the difference in OnSemi's position.

Given the timeline for our POPR and motion at the PTAB, please respond by 4PM ET on Monday October 16.

Sincerely,
Nick Matich

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