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

IPR2023-01244[1]
U.S. Patent No. 11,121,222

DECLARATION OF MATTHEW MURPHY

[1] Texas Instruments Incorporated, which filed a petition in IPR2024-00674, has been joined as a petitioner in this proceeding.

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").

6. I have reviewed pages 4-8 of a document labeled "Greenthread Ex. 2048." I have been informed that this document is Exhibit 2048 in the IPRs. In particular, 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. More particularly, I can confirm that onsemi has never sold any of the Intel Accused Products to Intel. Moreover, because onsemi does not sell any of the Intel Accused Products to Intel (or to anyone else), I can confirm that onsemi has never signed any customer, sales, indemnification, or any other documents for the sale of the Intel Accused Products by onsemi.

7. From time to time, my team and I communicate with employees of Intel regarding issues related to onsemi products. 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 representatives of onsemi's legal department have 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.

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

9. 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: May 27, 2025

Respectfully submitted,

Matthew Murphy