

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

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**BEFORE THE PATENT TRIAL AND APPEAL BOARD**

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CIRRUS LOGIC, INC.,  
OMNIVISION TECHNOLOGIES, INC., and  
TEXAS INSTRUMENTS INCORPORATED,  
Petitioner,

v.

GREENTHREAD, LLC.,  
Patent Owner.

IPR2024-00017 (Patent 8,421,195)<sup>1</sup>  
IPR2024-00018 (Patent 9,190,502)<sup>2</sup>  
IPR2024-00019 (Patent 11,316,014)<sup>3</sup>  
IPR2024-00020 (Patent 11,121,222)  
IPR2024-00021 (Patent 11,121,222 B2)

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**DECLARATION OF ELIZABETH LEACH**

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<sup>1</sup> Texas Instruments Incorporated, which filed a petition in IPR2024-00771, has been joined as a party to this proceeding.

<sup>2</sup> Texas Instruments Incorporated, which filed a petition in IPR2024-00773, has been joined as a party to this proceeding.

<sup>3</sup> Texas Instruments Incorporated, which filed a petition in IPR2024-00774, has been joined as a party to this proceeding.

I, Elizabeth Leach, declare as follows:

1. 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.

2. I am currently the Manager, Sales Administration for Cirrus Logic, Inc. ("Cirrus Logic"). I have held this position for approximately the last two years. Overall, I have been employed by Cirrus Logic in various positions for more than 14 years, and I have held various sales roles during that period.

3. Through my work for Cirrus Logic, I am familiar with Cirrus Logic's product sales and customers, including whether any Cirrus Logic products have been sold to Intel Corporation ("Intel").

4. I have been informed that Cirrus Logic is involved in proceedings at the U.S. Patent and Trademark Office and that the proceedings are known as *Inter Partes* Review proceedings ("IPRs").

5. I have reviewed pages 4-8 of a document labeled "Greenthread Ex. 2021." I have been informed that this document is Exhibit 2021 in the IPRs. In particular, I reviewed the portion of Exhibit 2021 under the heading "Intel Accused Products."

6. Cirrus Logic does not currently and has never sold any of the Intel Accused Products on pages 4-8 of Exhibit 2021. Moreover, Cirrus Logic has never sold any component of the Intel Accused Products to Intel. Cirrus Logic has never signed, created, or received any sales agreements or indemnification agreements relating to the Intel Accused Products.

7. 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 any patent infringement indemnification request to Cirrus Logic regarding the Intel Accused Products. I have also consulted with Cirrus Logic's legal department, and representatives of Cirrus Logic's legal department have confirmed to me that Cirrus Logic's legal department has never received an indemnification request from Intel regarding the Intel Accused Products.

8. I have consulted with Cirrus Logic's legal department, and representatives of Cirrus Logic's legal department have confirmed to me that Cirrus Logic did not become aware of any litigation involving Greenthread, LLC ("Greenthread") and Intel until after Cirrus Logic itself was sued by Greenthread on March 31, 2023.

9. I have consulted with Cirrus Logic's legal department, and representatives of Cirrus Logic's legal department have confirmed to me that Cirrus Logic never had any communications or correspondence with Intel regarding the

litigation involving Greenthread and Intel; Cirrus Logic was never in a position to control, and never did control, Intel's defense of any litigation involving Greenthread and Intel.

10. I reserve the right to supplement my representations herein to the extent it is deemed necessary.

11. 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.

Executed on July 9, 2025

Respectfully submitted,

A handwritten signature in blue ink that reads "Elizabeth M. Leach". The signature is written in a cursive style with a horizontal line underneath the name.

Elizabeth Leach