

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

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

v.

GREENTHREAD, LLC.,
Patent Owner.

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

DECLARATION OF TERENCE NG

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

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

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

1. I, Terence Ng, declare as follows.
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 matters set forth herein.
3. GlobalFoundries U.S. Inc. ("GF") is a leading semiconductor foundry that specializes in manufacturing integrated circuits (ICs) designed by other companies. As a foundry, GF's primary role is to provide production capability and advanced manufacturing technologies to companies that design semiconductor products and need a third party to manufacture those products. By partnering with GF, these companies can bring their semiconductor designs to market efficiently without investing in costly manufacturing infrastructure.
4. I am a Sales Director at GlobalFoundries U.S. Inc. I started working at GF in 2016 as Application Engineering Manager. In 2019, I moved into Sales as Principal Sales Account Manager supporting different accounts. I was promoted to Sales Director in 2022. My job scope includes providing customers commercial support and working with customers to bring future business to GF.
5. Through my roles within the sales organization of GF, I became familiar with GF's sales of products to Intel and the types of agreements GF has had with Intel. In 2023, my responsibilities included managing GF's sales relationship with Intel.

6. I have been informed that GF is a real-party-in-interest in proceedings at the U.S. Patent and Trademark Office for *inter partes* review of certain U.S. patents owned by Greenthread, LLC (“Greenthread”).

7. I have reviewed PDF pages 2 and 5–9 of Ex. 2021 from IPR2024-00017.⁵ PDF page 2 of the Exhibit identifies it as “GREENTHREAD’S AMENDED PRELIMINARY INFRINGEMENT CONTENTIONS.” PDF pages 5–7 of the Exhibit list various Intel microprocessors. PDF pages 8–9 of the Exhibit refer to Intel flash memory products (those microprocessors and flash memories collectively, “Intel Accused Products”).

8. I can confirm that GF has never manufactured or sold any Intel Accused Products to Intel, and GF is unaware of having supplied any components of Intel Accused Products. As a result, GF has never entered into any sales agreements with Intel (or with any other party) regarding the Intel Accused Products or entered into any indemnification agreements with Intel (or with any other party) regarding the Intel Accused Products.

9. I am informed that Greenthread filed a complaint in the U.S. District Court for the Western District of Texas on January 27, 2022 against Intel alleging infringement of its patents by Intel (“Greenthread Intel Litigation”).

⁵ I understand the same document has been filed as an exhibit in IPR2024-00018 (Ex. 2021), IPR2024-00019 (Ex. 2021), IPR2024-00020 (Ex. 2021), and IPR2024-00021 (Ex. 2021).

10. I am informed that Greenthread filed a complaint in the Western District of Texas on March 31, 2023 against Cirrus Logic, Inc. alleging infringement of its patents by Cirrus Logic ("Greenthread Cirrus Logic Litigation"). I am informed that because some of the Cirrus Logic products accused of infringement by Greenthread are manufactured by GF, Cirrus Logic requested GF's assistance in the defense around May 8, 2023.

11. As part of my role in GF's sales organization, I would have been aware if Intel had requested indemnification from GF because of the Greenthread Intel Litigation. I have also conferred with the legal team at GF regarding the time by which GF became aware of the Greenthread Intel Litigation. I understand that GF became aware of the Greenthread Intel Litigation only around June 2023. GF was not aware of the Greenthread Intel Litigation before that.

12. Based on my knowledge and investigation, Intel never sought indemnification of Intel Accused Products from GF or submitted any request for indemnification of Intel Accused Products to GF. GF was never in a position to control, nor did it actually control Intel's defense in the Greenthread Intel Litigation. As I mentioned above, GF did not manufacture or supply any Intel Accused Products that were at issue in the Greenthread Intel Litigation.

13. I hereby declare that all the statements made herein of my own knowledge are true and that all the 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 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 proceeding. I declare under penalty of perjury that the foregoing is true and correct.

July 11, 2025
Date



Terence Ng