

UNITED STATES PATENT AND TRADEMARK OFFICE
PATENT TRIAL AND APPEAL BOARD

_____ GREENTHREAD, LLC,	)	
	)	
Petitioner,	)	
	)	IPR Numbers:
vs.	)	
	)	IPR2024-00017
CIRRUS LOGIC INCORPORATED,	)	IPR2024-00018
OMNIVISION TECHNOLOGIES	)	IPR2024-00019
INCORPORATED, TEXAS	)	IPR2024-00020
INSTRUMENTS INCORPORATED,	)	IPR2024-00021
	)	
Patent Owners.	)	
_____	)	

* C O N F I D E N T I A L *

Deposition of TERENCE NG, taken remotely via
Zoom, before Rachel F. Gard, CSR, CCR, RPR, CRR,
Notary Public, commencing at the hour of
2:30 p.m. Central on Monday, July 28, 2025.

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1 I N D E X

2 WITNESS PAGE

3 TERENCE NG

4 Cross-Examination by Mr. Hejny 4

5

6 E X H I B I T S

7 EXHIBIT PAGE

8 Number 2021 (First referred to) 9

9

10 (Not attached)

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1 (Witness sworn.)

2 WHEREUPON:

3 TERENCE NG,

4 called as a witness herein, having been first duly

5 sworn, was examined and testified as follows:

6 CROSS-EXAMINATION

7 BY MR. HEJNY:

8 Q Good afternoon, Mr. Ng. How are you
9 today?

10 A Okay, Scott.

11 Q Have you ever been deposed before?

12 A One time.

13 Q When was that deposition taken?

14 A About 2020 time frame, I think, or 2021.

15 Q Was it in connection with a patent case?

16 A No, it was not.

17 Q Okay. So you understand the basic
18 groundwork for the deposition. I'll ask you some
19 questions, and I'll try to give you plenty of time
20 to answer and try not to talk over you. If I do,
21 I apologize in advance, but I want to give you
22 plenty of time to answer so the court reporter

1 gets your answers down fully.

2 If you don't understand any of my
3 questions, please don't hesitate to ask for
4 clarification.

5 But, otherwise, you know, we'll probably
6 take a break about once every hour, unless you
7 need a break sooner, in which case just let me
8 know. We'll try to keep things moving. Unless
9 there's a question that's currently pending, I'll
10 ask you to answer that question before we take a
11 break.

12 But other than that, let me know if you
13 have any questions up front, but we can move
14 forward.

15 A I'm okay. Thank you.

16 Q Is there any reason that you can't give
17 true and accurate testimony here today?

18 A No.

19 Q Where are you located today?

20 A I am in Palo Alto, California, in
21 Covington's office.

22 Q Okay. And counsel for Covington is with

1 you in the room today?

2 A That is correct.

3 Q Do you have any documents with you for
4 this deposition?

5 A Yes. I have the declaration with me, the
6 declaration.

7 Q Okay. No other documents in front of you?

8 A No.

9 Q And the declaration you're referring to,
10 that is the Declaration of Terrence Ng, which is
11 signed on the last page on July 11th, 2025?

12 A That is correct.

13 Q And right before your signature, there's a
14 line that says: I declare under penalty of
15 perjury that the foregoing is true and correct.

16 Do you see that?

17 A Yes, I do.

18 Q And you understand that you're testifying
19 here today as if you were before a Court under
20 penalty of perjury as well, correct?

21 A Yes.

22 Q When were you first contacted about

1 preparing this declaration in the case?

2 A About early July time frame.

3 Q Had you been -- strike that.

4 On the front page of your declaration,
5 there are a number of proceedings listed, and the
6 first three letters of each of them are IPR.

7 Do you see that?

8 A Yes.

9 Q When did you first become aware of any of
10 these IPRs?

11 A When I had my review with the GF legal
12 counsel.

13 Q And was that in the early July time frame
14 as well?

15 A Yeah, about early to mid July time frame.

16 Q Okay. Did you do anything to prepare for
17 your deposition today?

18 A I had a preparation review with the GF
19 legal counsel, as well as the outside counsel.

20 Q Was that a single meeting, or were there
21 multiple meetings?

22 A I had a -- I think with GF counsel and

1 legal and outside counsel last Thursday and also
2 last Friday.

3 Q About how long did you meet?

4 A About 2 hours per session.

5 Q So about 4 hours total spread over 2 days?

6 A About that, uh-huh, yeah.

7 Q Where did the meeting take place?

8 A One was remote. The other one was in GF
9 office, Santa Clara.

10 Q Were you shown any documents during
11 deposition preparation?

12 MR. BYUN: Objection. Privilege. And I
13 caution the witness not to reveal any of the
14 communication with counsel. You may answer yes or
15 no.

16 A Yes.

17 Q Did any of the documents that you reviewed
18 refresh your recollection as to the substance of
19 your declaration or the testimony that you're
20 going to provide today?

21 MR. BYUN: Again, I caution the witness
22 not to reveal any of the communication with

1 counsel. You may answer yes or no.

2 A Yes.

3 Q And which documents did you see that
4 refreshed your recollection regarding your
5 declaration or the testimony that you're going to
6 be giving today?

7 A I have seen the declaration paper in front
8 of me and also the said PDF file in the
9 declaration.

10 Q And when you say the PDF file in the
11 declaration, are you referring to Exhibit 2021?

12 A I would assume -- I do not recall the
13 number on that, but that's the one that identified
14 the microprocessor and the NAND flash.

15 Q Okay. So that was the document that
16 identified --

17 A Right.

18 Q -- certain Intel products, correct?

19 A Yes.

20 Q Did you review or were you provided with
21 any other documents that refreshed your
22 recollection during your deposition preparation?

1 A No.

2 Q Have you reviewed or seen any deposition
3 transcripts as part of your deposition
4 preparation?

5 A No.

6 Q Outside of your conversation with
7 GlobalFoundries' legal counsel or outside counsel
8 at Covington, have you spoken to any other parties
9 or their attorneys?

10 A No.

11 Q And you understand that GlobalFoundries is
12 listed as a real party at interest in some of the
13 IPR petitions that are listed on the cover page of
14 your declaration, correct?

15 A Yes.

16 Q And the entities that filed the petitions
17 identifying GlobalFoundries as a real
18 party-in-interest are Cirrus Logic and OmniVision.

19 Do you understand that?

20 A Yes.

21 Q Do you have any communications with any
22 personnel at Cirrus Logic or OmniVision?

1 A No.

2 Q Did you have any communications with
3 outside legal counsel for Cirrus Logic or
4 Omnivision?

5 A No.

6 Q Did you write the Declaration of Terrence
7 Ng that you have in front of you?

8 MR. BYUN: Objection. Form. You may
9 answer.

10 A Oh, okay. I -- it was prepared with help
11 of the GF legal counsel.

12 Q And what was your role in preparing the
13 declaration?

14 A I provided my experience in Section 4 in
15 it, and also reviewed with the GF legal counsel
16 the document as a whole together.

17 Q And did you take any actions to confirm
18 that the statements made in the declaration are
19 true and accurate?

20 A Yes, I reviewed with the GF legal counsel,
21 uh-huh.

22 Q If you'll turn to page 2 of your

1 declaration, and I'm looking at paragraph 8, let
2 me know when you're there.

3 A Yeah.

4 Q Okay. The first sentence in that
5 declaration in paragraph 8 states that: I can
6 confirm that GF has never manufactured or sold any
7 Intel accused products to Intel.

8 Do you see that?

9 A Yes.

10 Q What did you do to confirm that GF has
11 never manufactured or sold any Intel accused
12 products to Intel?

13 A I was the Intel account manager between
14 2022 to 2024. And based on my knowledge, I ran
15 the account. So if any product or purchases had
16 gone through Intel, I would know.

17 Q And when you refer to Intel accused
18 products, are you referring to the Intel
19 processors that are mentioned in paragraph 7 as
20 being on pages 5 through 9 of Exhibit 2021?

21 A Yes.

22 Q And in your declaration, when it says GF

1 that's GlobalFoundries, correct?

2 A Yes.

3 Q So that statement, the first portion of
4 the first sentence of paragraph 8 of your
5 declaration just confirms that GlobalFoundries
6 doesn't sell Intel processors, correct?

7 A We don't sell nor make Intel processors.

8 Q And the latter part of that sentence
9 states: And GF is unaware of having supplied any
10 components of Intel accused products.

11 Do you see that?

12 A Yes.

13 Q What do you mean by "unaware"?

14 A GF doesn't make or sell any of these
15 components.

16 Q And what do you mean when you're saying
17 "any of these components"?

18 A These processors or the NAND flash of
19 accused product, I guess, yeah, uh-huh.

20 Q Did you perform any investigation to
21 confirm that GF doesn't sell any of the components
22 of the Intel accused products?

■ ■ [REDACTED]

■ [REDACTED]

■ [REDACTED] [REDACTED]

■ [REDACTED]

5 Q When you say any components of Intel
6 accused products, do you mean a part of the
7 physical processor?

8 A Can you clarify what you're -- "part of
9 the processor," what do you mean by that?

10 Q One more time, give me your definition of
11 what is your definition of a component of an Intel
12 accused processor?

13 A My definition of the Intel processor would
14 be wafer, that's what we make, with Intel design
15 on it. And the processor will be part of that
16 design, which we don't make.

17 Q Did you do any investigation to determine
18 whether any of the Intel accused processors listed
19 in Exhibit 2021 include any parts or components
20 manufactured and sold by GlobalFoundries?

■ ■ ■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

10 And, second, these are custom processors
11 that GF do not have of Intel, so ...

12 Q And what do you mean that "GF did not have
13 of Intel"?

14 A We don't have a process that can
15 manufacture their processors.

16 Q Do you have a process that can manufacture
17 parts for use in the Intel processor?

18 A No. As far as I know, the processor is
19 just a processor. So there's no different
20 components available. There's no subsystem.
21 That's what I'm trying to answer.

22 Q What do you mean there's no subsystem?

1 A Processor is one piece. So either you
2 make it or you don't, so there are no different
3 parts of it.

4 Q Have you ever seen a parts list for any of
5 the processors that are listed on pages 5 through
6 9 of Exhibit 2021?

7 A I see the microprocessor list on that
8 exhibit.

9 Q Have you seen any parts list for the
10 microprocessors?

11 MR. BYUN: Objection. Form.

12 A No, I have not seen the microprocessor
13 list, but they are made out of primarily the
14 microprocessor design and which we don't have that
15 process to make.

16 Q Well, you said you were Intel contact or
17 relationship manager with Intel in the past,
18 correct?

19 A Yes.

20 Q And do you still have a relationship with
21 contacts at Intel?

22 A Yes.

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1 Q Did you reach out to anyone at Intel to
2 determine whether or not any of those processors
3 listed on pages 5 through 9 of Exhibit 2021
4 include any part or component made and sold by
5 GlobalFoundries?

6 A No.

7 Q Is there someone else on your team that is
8 currently the relationship manager for Intel?

9 A Yes.

10 Q And who is that?

11 A It's a gentleman named Sean Chen.

12 Q Did you reach out to him to determine
13 whether or not he had a parts list for any of the
14 processors listed on pages 5 through 9 of
15 Exhibit 2021?

16 A No because Sean -- Sean -- I passed the
17 account to Sean, and I know the parts list where
18 we were at, and he maintained those part lists
19 that we have today. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

■ [REDACTED]

2 Q And Mr. -- Sean's last name is it Chan,

3 C H A N?

4 A C H E N.

5 Q Chen, thank you.

6 Did you ask Mr. Chen to reach out to Intel
7 regarding any of the products listed on pages 5
8 through 9 of Exhibit 2021?

9 A No.

10 Q And you mentioned that Intel is still a
11 customer of GlobalFoundries, correct?

12 A Yes.

13 Q What types of products does
14 GlobalFoundries make for Intel?

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

6 Q And is GlobalFoundries a custom
7 manufacturer?

8 A Yes, we are custom, yeah, uh-huh. Build
9 to order.

10 Q Does GlobalFoundries sell to any
11 third-party resellers that might turn around and
12 then sell those parts to Intel?

13 A The part -- can you clarify the part? You
14 mean the four parts that I mentioned just now?

15 Q Well, any part. Is there anyone that
16 GlobalFoundries sells products to that could then
17 turn around and sell those products to Intel?

18 ■ [REDACTED]

19 [REDACTED] The
20 purchase order has to come from Intel to order.

21 Q Are there any other parts that
22 GlobalFoundries sells to resellers or distributors

1 that could be purchased by Intel on the market?

2 MR. BYUN: Objection. Form.

3 A Are there any other parts ... if we're
4 talking different customer, customer at times they
5 will say I want other reseller to purchase on
6 behalf of me. So in that scenario, then the
7 purchase order will come from a different company
8 but if they are doing it directly in authorization
9 of the company that's asking, the reseller.

10 Q Did you do any investigation to determine
11 whether any reseller is selling GlobalFoundries
12 parts to Intel?

13 MR. BYUN: Objection. Form. Outside the
14 scope.

15 THE WITNESS: Okay to answer?

16 MR. BYUN: Yes, please.

■ ■ [REDACTED]

■ [REDACTED]

■ ■ [REDACTED]

■ [REDACTED]

■ ■ [REDACTED]

■ [REDACTED]

[illegible]

1 Q But neither you nor Mr. Chen reached out
2 directly to Intel, correct?

3 MR. BYUN: Objection. Form.

4 A No, we did not reach out to Intel because
5 we have little business with Intel to speak of,
6 unfortunately, so ...

7 MR. BYUN: I designate the transcript
8 confidential under the protective order.

9 MR. HEJNY: No objection.

10 Q Does GlobalFoundries sell to customers
11 other than Intel?

12 A Yes.

13 Q And are these custom product orders?

14 A They are -- yeah, they're all custom
15 products.

16 Q And when we say "custom products," does
17 that mean that the entity such as Intel that
18 GlobalFoundries is supplying the product to
19 provides specifications to GlobalFoundries for
20 that product?

21 MR. BYUN: Objection. Form. Outside the
22 scope.

[illegible]

■ ■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ ■ [REDACTED]

■ [REDACTED]

■ ■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ ■ [REDACTED]

10 Q Were you asked to provide any of those
11 documents in connection with the preparation of
12 your declaration in this case?

13 A Can you ...

14 MR. BYUN: Objection. Privilege. I
15 instruct the witness not to answer.

16 Q That's a yes-or-no question.

17 Were you asked to provide any purchase
18 orders with Intel in connection with the
19 preparation of your declaration in this case?

20 MR. BYUN: Well, same objection. Counsel,
21 can you rephrase your question?

22 Q Did you provide any of these Intel

1 purchase orders in connection with your
2 preparation of your declaration in this case?

3 MR. BYUN: The witness may answer yes or
4 no.

5 A No.

■ ■ [REDACTED]

■ [REDACTED]

■ [REDACTED] [REDACTED] [REDACTED]

■ ■ [REDACTED]

■ [REDACTED] [REDACTED]

11 Q Do you have access to that GF database?

12 A No.

13 Q Who has access to that GF database?

14 A It would be a different team called
15 customer service rep team.

■ ■ [REDACTED]

■ [REDACTED]

■ ■ [REDACTED]

■ ■ [REDACTED]

■ [REDACTED]

21 A No.

22 Q Does GlobalFoundries have any subsidiaries

1 or affiliates?

2 A Yes.

3 Q And who are GlobalFoundries' subsidiaries
4 and affiliates?

5 A Let's see. We have GF Singapore, GFS,
6 which is short. And GF U.S. 2.

7 Q So GF Singapore, correct?

8 A Yes.

9 Q And GF U.S.?

10 A 2, number 2.

11 Q What's the significance of the number 2?

12 A I don't know.

13 Q I was just curious.

14 A Yeah.

15 Q Did you do any investigation to determine
16 whether GF Singapore or GF U.S. 2 make or sell any
17 products to Intel?

18 A No.

19 Q Were you asked to perform that
20 investigation?

21 MR. BYUN: Objection. Calls for
22 privilege. I instruct the witness not to answer.

1 Counsel, if you can rephrase your question.

[illegible]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

4 Q So as part of your role at
5 GlobalFoundries, you'd be able to see a purchase
6 order if it came through and was satisfied by GF
7 Singapore or GF U.S. 2?

8 A Yes, if I need to see the PO.

9 Q Did you check to see if there were any POs
10 for GF Singapore or GF U.S. 2?

11 A Check the PO for what? Could you clarify?

12 Q Sure. As part of -- strike that. Let's
13 start over.

14 As part of your investigation, did you
15 check the system to see if there had been any
16 purchase orders that had satisfied by GF Singapore
17 or GF U.S. 2?

18 MR. BYUN: Objection. Form.

19 A Part of the invest- -- are you asking if I
20 investigated if we have the microprocessor PO in
21 the system? Sorry. Can you be more clear?

22 Q As part of your investigation, did you

1 examine purchase orders that would have let you
2 know whether any product made or sold by GF
3 Singapore or GF U.S. 2 were being provided to
4 Intel?

5 MR. BYUN: Objection. Form.

6 A No. Again, I did not have to. We don't
7 have the process nor the forecast nor the revenue
8 for those particular part shipment. So PO just
9 one avenue. But, again, there's the forecast,
10 revenue, and also, we don't have the process.

11 Q So you in your position today have access
12 to forecasts and revenue for GF Singapore and GF
13 U.S. 2?

14 A Yes.

15 Q Did you investigate why GlobalFoundries
16 was named as a real party-in-interest in these IPR
17 petitions by Cirrus Logic and OmniVision?

18 MR. BYUN: Objection. Form. I caution
19 the witness not to reveal any of your
20 communications with your counsel. But otherwise,
21 you may answer.

22 A I was briefed on the reason.

1 Q And without revealing privileged
2 communication, can you tell me the reason or your
3 understanding of the reason as to why
4 GlobalFoundries was named as a real
5 party-in-interest in the IPR petitions filed by
6 Cirrus Logic and OmniVision?

7 MR. BYUN: Objection. Calls for
8 privilege. I instruct the witness not to answer.

9 Q Can you answer that question without
10 revealing privileged communications?

11 MR. BYUN: The witness may answer yes or
12 no.

13 A That would be no.

14 Q Who briefed you on the reason why
15 GlobalFoundries was named as a real
16 party-in-interest?

17 A Outside counsel with me.

18 Q So the Covington firm briefed you as to
19 why GlobalFoundries was named as a real
20 party-in-interest?

21 A Yes.

22 Q But you can't answer any further questions

1 on that topic without revealing privileged
2 communications?

3 MR. BYUN: Objection. Asked and answered.

4 A Yes.

5 Q Do you understand why you were asked to
6 prepare this declaration, the declaration of
7 Terrence Ng?

8 MR. BYUN: Objection. Privilege. I
9 caution the witness not to reveal any of your
10 communications with counsel. Without revealing
11 your discussion with your counsel, you may answer,
12 if you can.

13 A Yes.

14 Q And what is your understanding as to why
15 you were asked to prepare this declaration?

16 MR. BYUN: Same objection. Same caution.
17 Go ahead and answer.

18 A I was the account manager supporting
19 Intel, and Intel is part of this. The
20 microprocessor and NAND flash is part of this, so
21 I'm being asked to bring the history up.

22 Q Were you -- did you review any of the

1 briefing that's been filed in these IPR
2 proceedings?

3 A I have seen the declaration, and I've seen
4 the said Exhibit 2021.

5 Q Did you see any other documents that have
6 been filed as part of the IPR proceeding that were
7 submitted by Greenthreads?

8 A No, I do not.

9 Q Did you see any other documents or
10 briefing that were filed as part of these IPR
11 proceedings on behalf of GlobalFoundries, Cirrus
12 Logic, or OmniVision?

13 A No.

14 Q Did you review the Board order authorizing
15 additional discovery in these IPR proceedings?

16 A No.

17 Q And this is a yes-or-no question. Were
18 you informed that the crux of the dispute about
19 which you're being deposed here today relates to
20 real parties-in-interest to these IPR proceedings?

21 MR. BYUN: Objection. Calls for
22 privilege. I instruct the witness not to answer.

1 Q Are you going to follow your counsel's
2 advice?

3 A Yes.

4 Q Have you discussed the contents of your
5 declaration or your investigation with anyone
6 other than GlobalFoundries' in-house counsel or
7 outside counsel?

8 A Only the GlobalFoundries and outside
9 counsel. No one else.

10 Q If you could turn to the first page of
11 your declaration?

12 A Okay.

13 Q And in paragraph 2, the second sentence
14 says: I make this declaration based on facts and
15 matters within my own knowledge and on information
16 provided to me by others.

17 Do you see that?

18 A Yes.

19 Q What others provided you information?

20 A GF legal counsel and outside counsel.

21 Q And what information did they provide to
22 you?

1 A This declaration and also the
2 Exhibit 2021.

3 Q No additional information?

4 A No.

5 Q Turning to paragraph 10 on page 3 of your
6 declaration, the last sentence in paragraph 10
7 states: I am informed that because some of the
8 Cirrus Logic products accused of infringement by
9 Greenthread are manufactured by GF, Cirrus Logic
10 requested GF's assistance in the defense around
11 May 8th, 2023.

12 Do you see that?

13 A Yes.

14 Q Did Cirrus Logic request that
15 GlobalFoundries indemnify them as part of that
16 litigation?

17 A I don't know. I assume that is -- that's
18 what this paragraph states, and yeah. I would
19 assume so, you know.

20 Q But you don't know as you sit here today?

21 A No, because I do not manage Cirrus Logic.

22 Q Who informed you that Cirrus Logic

1 requested GlobalFoundries' assistance in the
2 defense around May 8th, 2023?

3 A I prepared a document with my GF legal
4 counsel, so this is part of that.

5 Q So you received that information from GF
6 legal counsel?

7 A Yes.

8 Q Inside counsel or outside counsel?

9 A GF counsel and also Covington as well.

10 Q So --

11 A Yeah.

12 Q Are you familiar with the concept of
13 indemnity?

14 A Not to the full extent of legal term, but
15 yeah.

16 Q Have you ever reviewed GlobalFoundries'
17 terms and conditions of sales of its products?

18 MR. BYUN: Objection. Form.

19 A I don't usually, unless there's issues
20 that come up.

21 Q Were you asked to review the terms and
22 conditions of GlobalFoundries' sales contracts

■ [REDACTED]

■ ■ [REDACTED]

■ [REDACTED] [REDACTED]

4 Q So you did not review the Intel
5 indemnification clause in connection with the
6 preparation of your declaration; is that correct?

7 A That's correct.

■ ■ [REDACTED]

■ [REDACTED] [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ ■ [REDACTED]

■ ■ [REDACTED]

■ ■ [REDACTED]

■ [REDACTED] [REDACTED]

■ [REDACTED]

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■ [REDACTED] [REDACTED]

■ [REDACTED]

■ ■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ ■ [REDACTED]

6 Q Does GlobalFoundries have design
7 agreements with Intel?

8 A Sorry. What, design agreement?

9 Q Yes.

10 A I am not familiar with that agreement.

■ ■ [REDACTED]

■ [REDACTED]

■ ■ [REDACTED]

■ ■ [REDACTED]

■ [REDACTED]

■ ■ [REDACTED]

■ ■ [REDACTED]

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■ ■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ ■ [REDACTED]

■ ■ [REDACTED]

■ [REDACTED]

■ ■ [REDACTED]

13 Q You don't have a copy of Exhibit 2021 in
14 front of you, do you?

15 A No, I don't.

16 Q Okay. I'm going to endeavor to upload a
17 portion of one of those documents. Okay. I've
18 uploaded an excerpt from Exhibit 2021 to the chat,
19 and I'm going to ask you to download that and let
20 me know when you have it.

21 MR. HEJNY: And for the record, Counsel, I
22 only uploaded pages 1 through 9 of Exhibit 2021

1 because it's 27-megabyte file, but I will attest
2 to you that it's a true and accurate copy of pages
3 1 through 9 of Exhibit 2021.

4 MR. BYUN: One second.

5 MR. HEJNY: Sure.

6 Q Take one second and download it and flip
7 through the pages and see if it looks familiar.

8 A Technical difficulty. Hold on.

9 Q No, take your time.

10 A Adobe keep closing.

11 MR. BYUN: Can we take a quick break to
12 resolve the technical issue?

13 MR. HEJNY: Sure. Let's go off the
14 record. Let's come back in 10 minutes and see if
15 we can resolve this. And if not, I'll find a way
16 to email it. Off the record.

17 (A short break was taken.)

18 Q Mr. Ng, over the break, were you able to
19 download the portion of Exhibit 2021 that I
20 uploaded in the chat?

21 A Yes.

22 Q And if you look at the first page of the

1 PDF, that begins at the bottom right-hand corner,
2 there's page 1 or 371.

3 Do you see that?

4 A Yes.

5 Q And the last page of the document says
6 page 10 of 371.

7 Do you see that?

8 A Yes. Page 9 of 371.

9 Q Okay. So you got through page 9 of 371?

10 A Yeah.

11 Q Great. And does this document look
12 familiar? Is this what you reviewed in
13 preparation for your deposition?

14 A Yes.

15 Q Now, turning back to paragraph 8 of your
16 declaration --

17 A Okay.

18 Q -- okay, and in the first sentence you
19 state: I can confirm that GF has never
20 manufactured or sold any Intel accused product to
21 Intel.

22 Do you see that?

1 A Yes.

2 Q And the next clause says: GF is unaware
3 of having supplied any components of Intel accused
4 products.

5 Do you see that?

6 A Yes.

7 Q Why did you choose to use the word
8 "unaware" as opposed to "has never" in connection
9 with components of Intel accused products?

10 MR. BYUN: Objection. Form.

11 A Well, we don't have the process
12 technology. So in terms of -- yeah, I'm not aware
13 of how we can even supply any of the components,
14 so that's the intent of that word.

15 Q Did you choose that word for inclusion of
16 your declaration, the word "unaware"?

17 MR. BYUN: Objection. Form.

18 A This one was in preparation, support with
19 GF legal counsel.

20 Q But did you personally choose the word
21 "unaware" in the second clause of the first
22 paragraph in paragraph 8?

1 A No.

2 Q Did you choose the words "has never" in
3 connection with the first clause of the first
4 sentence of paragraph 8?

5 A I did not choose the words "has never,"
6 but I'm pretty certain we never made it.

7 Q And is there -- "unaware" is a much more
8 vague term than "has never." Can we agree on
9 that?

10 MR. BYUN: Objection. Form.

11 A I am not vocabulary expert, so okay.
12 But ...

13 Q When you examined the product list in
14 Exhibit 2021, what did you do as part of your
15 investigation to determine whether or not any part
16 or any component manufactured by GlobalFoundries
17 was included in any of the Intel processors listed
18 in that exhibit?

19 MR. BYUN: Objection. Form.

20 A I read the exhibit to see what kind of
21 parts are being listed here, and I recognized
22 publicly these are Intel's CPU and NAND flash.

1 And basically to me, it's case closed because we
2 don't make processor for Intel, nor NAND flash.

3 Q We can agree that an Intel processor is
4 composed of many subcomponents, correct?

5 MR. BYUN: Objection. Form.

6 A Can you define "many"?

7 Q Let's turn to page 5 of 371 in
8 Exhibit 2021.

9 A Okay. Yeah, uh-huh.

10 Q And the first processor listed under Intel
11 Atom processors is Intel Atom C2308.

12 Do you see that?

13 A Yes.

14 Q And can we agree that the Intel Atom C2308
15 processor include many parts that are assembled to
16 form that processor assembly?

17 MR. BYUN: Objection. Form.

18 A Again, as far as I know, there should be
19 just a CPU in it. That's it. It's Intel-designed
20 CPU.

21 Q Does the Intel Atom C2308 include a
22 substrate on which the processor is installed?

1 MR. BYUN: Objection. Form.

2 A Sure, you have substrate, uh-huh, yeah.

3 You have substrate, you may have DRAM, you may
4 have capacitor.

5 Q So presumably the Intel Atom C2308
6 processor has a parts list that's managed
7 internally at Intel, correct?

8 MR. BYUN: Objection. Form. Outside the
9 scope.

10 A Maybe. I don't know. We don't make the
11 processor, so I wouldn't know the details.

12 Q Did you contact anyone at Intel to get
13 access to the parts list for an Intel Atom C2308
14 processor?

15 A No.

16 Q Did you contact Intel in-house to
17 determine whether or not you could get access to a
18 parts list for the Intel Atom C2316 processor?

19 MR. BYUN: Objection. Form.

20 A No.

21 Q Did you contact anyone at Intel to find
22 out whether you could get access to a parts list

1 for any of the Intel processors listed on pages 5
2 through 7 of Exhibit 2021?

3 MR. BYUN: Objection. Form.

4 A No.

5 Q Did you contact Intel to find out if you
6 could have access to a parts list for any of the
7 NAND flash memory products identified on page 8 of
8 Exhibit 2021?

9 MR. BYUN: Objection. Form.

10 A No. We don't make any of them, so ...

11 Q When you say you don't make any of them,
12 what do you mean by that?

13 A In order to manufacture these components,
14 there needs to be a process technology that can
15 service the parts that we are looking at. We
16 don't have the processor technologies nor the NAND
17 flash technology at GlobalFoundries.

18 Q But did you ask Intel if there were any
19 GlobalFoundries' parts or subcomponents on a part
20 list for the Intel Atom C2308 processor?

21 MR. BYUN: Objection. Form.

22 A No.

1 Q Did you ask Intel if there were any
2 GlobalFoundries parts or subcomponents on a parts
3 list for any of the processors listed on pages 5
4 through 7 of Exhibit 2021?

5 A No.

6 Q Has Intel ever requested indemnity from
7 GlobalFoundries in the past?

8 A Not -- no.

9 Q Do you know that definitively, or did you
10 ask anyone or anyone in the legal department at
11 GlobalFoundries as to whether or not Intel had
12 ever requested indemnity from GlobalFoundries in
13 the past?

14 A I didn't have to ask. Usually if such
15 things happen, legal will come to me. But no
16 legal ever come to me.

17 Q Did you ask Mr. Chen if he was aware of
18 Intel ever coming to GlobalFoundries and
19 requesting indemnity?

20 A No, did not have to. He reports to me.
21 He would be crying to me if there was.

22 Q Who was your predecessor when it comes to

1 the product relationship person with Intel?

2 A His name was Venkat Ramasubramanian. He's
3 left GF.

4 Q Did you ask in-house counsel at
5 GlobalFoundries whether Intel had ever made an
6 indemnity demand to GlobalFoundries?

7 A No.

8 MR. HEJNY: Sorry, guys. I'm having some
9 technical difficulties. Can we go off the record?

10 MR. BYUN: Yes.

11 MR. HEJNY: Give me 10 minutes. Something
12 is going on with my camera.

13 (A short break was taken.)

14 MR. HEJNY: I have no further questions,
15 and I pass the witness.

16 MR. BYUN: No further questions from me.
17 Actually, can we take a break?

18 MR. HEJNY: Sure. Just let me know how
19 long. I'm good with it. 10 minutes?

20 MR. BYUN: Sure.

21 MR. HEJNY: Great. See you in a minute.

22 (A short break was taken.)

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1 MR. BYUN: I have no further questions.

2 (Witness excused, 3:56 p.m. Central.)

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C E R T I F I C A T E

I, RACHEL F. GARD, RPR, CCR, CRR, CSR No. 084-3324, No. 9315, No. 1010, a Certified Shorthand Reporter in and for the States of Illinois, Michigan, Nevada at large, do hereby certify that TERENCE NG, the deponent herein, was previously duly sworn to tell the truth, the whole truth, and nothing but the truth in the aforementioned matter;

That the foregoing deposition was taken on behalf of Petitioner on the 28th day of July, 2025, at 2:30 p.m. Central, pursuant to the applicable rules;

That said deposition was taken down in stenograph notes and afterwards reduced to typewriting under my direction, and that the typewritten transcript is a true record of the testimony given by the said deponent; and that signature was requested by the deponent and all parties present;

That the parties were represented by their counsel as aforementioned.

I do further certify that I am a disinterested person in this cause of action, that I am not a relative or attorney of either party or otherwise interested in the event of this action, and that I am not in the employ of the attorneys for any party.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my seal on this 28th day of July, 2025.



COURT REPORTER

1 Terence Ng c/o

2 Covington & Burling LLP

3 3000 El Camino Real, 5 Palo Alto Square

4 Palo Alto, California 94306

5 Case: Greenthread, LLC v. Cirrus Logic Inc., et al.

Date of deposition: 7/28/25

6 Deponent: Terence Ng

7 Please be advised that the transcript in the
above-referenced matter is now complete and ready
8 for signature.

The deponent may come to this office to sign
9 the transcript, a copy may be purchased for the
10 witness to review and sign, or the deponent and/or
counsel may waive the option of signing.

11 Please advise us of the option selected.

Please forward the errata sheet and the original
12 signed signature page to counsel noticing the
13 deposition, noting the applicable time allowed for
14 such by the governing Rules of Procedure.

15 If you have any questions, please do not
16 hesitate to call our office at (202) 232-0646.

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Witness Name: Terence Ng

7 Deposition Date: 7/28/25

8 I do hereby acknowledge that I have read and
examined the foregoing pages of the transcript of
9 my deposition and that:

(Check appropriate box):

10 () The same is a true, correct and
11 complete transcription of the answers given by me
to the questions therein recorded.

12 () Except for the changes noted in the attached
13 Errata Sheet, the same is a true, correct, and
14 complete transcription of the answers given by me
15 to the questions therein recorded.

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6 ERRATA SHEET

7

8 Case Name: Greenthread, LLC v. Cirrus Logic Inc., et al.

9 Witness Name: Terence Ng

10 Deposition Date: 7/28/25

11 Page No. Line No. Change

12

13

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15

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17

18

19

20

21 Signature

Date

22

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