

PUBLIC VERSION

From: Nicholas T. Matich
Sent: Tuesday, November 7, 2023 6:39 PM
To: Fulghum, Roger; Tanya Wood; Speegle, Mark; Daniel.Anderson@andersonpatents.com; DL Greenthread, LLC v. onsemi
Cc: Greenthread-OnSemi-MS
Subject: RE: Semiconductor v. Greenthread IPR2023-01242, -01243 and -01244

Roger,

We are still confused about what you are seeking to make public and/or share with in-house counsel. Are you trying to make the license public? Are you trying to share the version of the license that was attached to our briefing with in house counsel? Please let me know if it would be helpful to meet and confer regarding OnSemi's requests.

Finally, RPX provided the following:

[REDACTED]

Best,
Nick

McKool Smith | Nicholas T. Matich
Principal | Washington | Tel: (202) 370-8301 | Mobile: (703) 863-7922

From: Fulghum, Roger <Roger.Fulghum@BakerBotts.com>
Sent: Tuesday, November 7, 2023 5:36 PM
To: Nicholas T. Matich <nmatich@McKoolSmith.com>; Tanya Wood <twood@McKoolSmith.com>; Speegle, Mark <mark.speegle@bakerbotts.com>; Daniel.Anderson@andersonpatents.com; DL Greenthread, LLC v. onsemi <dlgreenthreadvonsemi@BakerBotts.com>
Cc: Greenthread-OnSemi-MS <Greenthread-OnSemi-MS@mckoolsmith.com>
Subject: RE: Semiconductor v. Greenthread IPR2023-01242, -01243 and -01244

Nick,

onsemi will not withdraw its request to unseal the briefing. As we explained in our note to the Board, sealing the entirety of the motion, the response, and the reply, including all exhibits to each, is not appropriate and is contrary to practice before the PTAB and public policy. We are not aware of anything in the briefs themselves that is legitimately confidential.

With regard to my e-mail below concerning sharing the Reply with Mr. Tuttle and Mr. Engel, I was referring to the Reply and all exhibits to the Reply.

Thanks, Roger.

From: Nicholas T. Matich <nmatich@McKoolSmith.com>
Sent: Tuesday, November 7, 2023 11:27 AM

To: Fulghum, Roger <Roger.Fulghum@BakerBotts.com>; Tanya Wood <twood@McKoolSmith.com>; Speegle, Mark <mark.speegle@bakerbotts.com>; Daniel.Anderson@andersonpatents.com; DL Greenthread, LLC v. onsemi <dlgreenthreadvonsemi@BakerBotts.com>
Cc: Greenthread-OnSemi-MS <Greenthread-OnSemi-MS@mckoolsmith.com>
Subject: RE: Semiconductor v. Greenthread IPR2023-01242, -01243 and -01244

[EXTERNAL EMAIL]

Thank you. I also expect that they would want you to withdraw your request to unseal the briefing. Greenthread also has its own interest in protecting the confidentiality of the RPX agreements and, regardless of what RPX does, Greenthread will oppose any effort to make those public. May I tell RPX that OnSemi will withdraw its request to unseal the briefing if the below counsel can see the entirety of the reply?

Also, by exhibits, I assume you are not including the unredacted RPX license, because in house counsel can already see the substance of that, but please confirm.

McKool Smith | Nicholas T. Matich
Principal | Washington, DC | Tel: (202) 370-8301 | Mobile: (703) 863-7922

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From: Fulghum, Roger <Roger.Fulghum@BakerBotts.com>
Sent: Tuesday, November 7, 2023 12:16 PM
To: Nicholas T. Matich <nmatich@McKoolSmith.com>; Tanya Wood <twood@McKoolSmith.com>; Speegle, Mark <mark.speegle@bakerbotts.com>; Daniel.Anderson@andersonpatents.com; DL Greenthread, LLC v. onsemi <dlgreenthreadvonsemi@BakerBotts.com>
Cc: Greenthread-OnSemi-MS <Greenthread-OnSemi-MS@mckoolsmith.com>
Subject: RE: Semiconductor v. Greenthread IPR2023-01242, -01243 and -01244

Nick,

We would propose that the entirety of the Reply, including all exhibits, be shared with Rob Tuttle and Josh Engel of onsemi.

Thanks, Roger.

From: Nicholas T. Matich <nmatich@McKoolSmith.com>
Sent: Monday, November 6, 2023 7:01 PM
To: Fulghum, Roger <Roger.Fulghum@BakerBotts.com>; Tanya Wood <twood@McKoolSmith.com>; Speegle, Mark <mark.speegle@bakerbotts.com>; Daniel.Anderson@andersonpatents.com; DL Greenthread, LLC v. onsemi <dlgreenthreadvonsemi@BakerBotts.com>
Cc: Greenthread-OnSemi-MS <Greenthread-OnSemi-MS@mckoolsmith.com>
Subject: Re: Semiconductor v. Greenthread IPR2023-01242, -01243 and -01244

[EXTERNAL EMAIL]

Roger

[REDACTED]
[REDACTED]
me who at OnSemi would see it?

Can you tell

McKool Smith | Nicholas T. Matich

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From: Nicholas T. Matich <nmatich@McKoolSmith.com>

Sent: Friday, November 3, 2023 4:21:32 PM

To: Fulghum, Roger <Roger.Fulghum@BakerBotts.com>; Tanya Wood <twood@McKoolSmith.com>; Speegle, Mark <mark.speegle@bakerbotts.com>; Daniel.Anderson@andersonpatents.com <Daniel.Anderson@andersonpatents.com>; DL Greenthread, LLC v. onsemi <dlgreenthreadvonsemi@BakerBotts.com>

Cc: Greenthread-OnSemi-MS <Greenthread-OnSemi-MS@mckoolsmith.com>

Subject: RE: Semiconductor v. Greenthread IPR2023-01242, -01243 and -01244

[REDACTED] However, if you propose some redactions that exclude the material from the RPX declaration (and the declaration itself) we might be able to consent to that.

McKool Smith | Nicholas T. Matich

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From: Fulghum, Roger <Roger.Fulghum@BakerBotts.com>

Sent: Friday, November 3, 2023 3:29 PM

To: Nicholas T. Matich <nmatich@McKoolSmith.com>; Tanya Wood <twood@McKoolSmith.com>; Speegle, Mark <mark.speegle@bakerbotts.com>; Daniel.Anderson@andersonpatents.com; DL Greenthread, LLC v. onsemi <dlgreenthreadvonsemi@BakerBotts.com>

Cc: Greenthread-OnSemi-MS <Greenthread-OnSemi-MS@mckoolsmith.com>

Subject: RE: Semiconductor v. Greenthread IPR2023-01242, -01243 and -01244

Nick, any answer on this?

From: Nicholas T. Matich <nmatich@McKoolSmith.com>

Sent: Thursday, November 2, 2023 7:24 PM

To: Fulghum, Roger <Roger.Fulghum@BakerBotts.com>; Tanya Wood <twood@McKoolSmith.com>; Speegle, Mark <mark.speegle@bakerbotts.com>; Daniel.Anderson@andersonpatents.com; DL Greenthread, LLC v. onsemi <dlgreenthreadvonsemi@BakerBotts.com>

Cc: Greenthread-OnSemi-MS <Greenthread-OnSemi-MS@mckoolsmith.com>

Subject: RE: Semiconductor v. Greenthread IPR2023-01242, -01243 and -01244

[EXTERNAL EMAIL]

I expect that should not be a problem, but allow me to confirm with RPX.

McKool Smith | Nicholas T. Matich

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From: Fulghum, Roger <Roger.Fulghum@BakerBotts.com>
Sent: Thursday, November 2, 2023 7:52 PM
To: Tanya Wood <twood@McKoolSmith.com>; Speegle, Mark <mark.speegle@bakerbotts.com>;
Daniel.Anderson@andersonpatents.com; DL Greenthread, LLC v. onsemi <dlgreenthreadvonsemi@BakerBotts.com>
Cc: Greenthread-OnSemi-MS <Greenthread-OnSemi-MS@mckoolsmith.com>
Subject: RE: Semiconductor v. Greenthread IPR2023-01242, -01243 and -01244

Nick,

Let me know if any of these materials I cannot be shared with onsemi's in-house counsel.

Thanks, Roger.

From: Fulghum, Roger
Sent: Thursday, November 2, 2023 6:46 PM
To: Tanya Wood <twood@McKoolSmith.com>; Speegle, Mark <mark.speegle@bakerbotts.com>;
Daniel.Anderson@andersonpatents.com; DL Greenthread, LLC v. onsemi <dlgreenthreadvonsemi@BakerBotts.com>
Cc: Greenthread-OnSemi-MS <Greenthread-OnSemi-MS@mckoolsmith.com>
Subject: RE: Semiconductor v. Greenthread IPR2023-01242, -01243 and -01244

Thanks Tanya. Downloaded without issue.

From: Tanya Wood <twood@McKoolSmith.com>
Sent: Thursday, November 2, 2023 6:37 PM
To: Fulghum, Roger <Roger.Fulghum@BakerBotts.com>; Speegle, Mark <mark.speegle@bakerbotts.com>;
Daniel.Anderson@andersonpatents.com; DL Greenthread, LLC v. onsemi <dlgreenthreadvonsemi@BakerBotts.com>
Cc: Greenthread-OnSemi-MS <Greenthread-OnSemi-MS@mckoolsmith.com>
Subject: RE: Semiconductor v. Greenthread IPR2023-01242, -01243 and -01244

[EXTERNAL EMAIL]

Now attached without encryption.

Please confirm you may access the files.

Thank you.

Tanya

McKool Smith | Tanya Wood
Senior Paralegal | Washington, D.C. | Tel: (202) 370-8331

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From: Fulghum, Roger <Roger.Fulghum@BakerBotts.com>
Sent: Thursday, November 2, 2023 7:31 PM
To: Tanya Wood <twood@McKoolSmith.com>; Speegle, Mark <mark.speegle@bakerbotts.com>;
Daniel.Anderson@andersonpatents.com; DL Greenthread, LLC v. onsemi <dlgreenthreadvonsemi@BakerBotts.com>
Cc: Greenthread-OnSemi-MS <Greenthread-OnSemi-MS@mckoolsmith.com>
Subject: RE: Semiconductor v. Greenthread IPR2023-01242, -01243 and -01244

Tanya,

I get to an error before I get a chance to enter the password. It is the same error as last time.

Thanks, Roger.

From: Tanya Wood <twood@McKoolSmith.com>
Sent: Thursday, November 2, 2023 6:29 PM
To: Fulghum, Roger <Roger.Fulghum@BakerBotts.com>; Speegle, Mark <mark.speegle@bakerbotts.com>;
Daniel.Anderson@andersonpatents.com; DL Greenthread, LLC v. onsemi <dlgreenthreadvonsemi@BakerBotts.com>
Cc: Greenthread-OnSemi-MS <Greenthread-OnSemi-MS@mckoolsmith.com>
Subject: RE: Semiconductor v. Greenthread IPR2023-01242, -01243 and -01244

[EXTERNAL EMAIL]

Hello Roger,

Will you please try this password to extract: [REDACTED]

I will upload as well should this not work.

Thank you and please let me know.

Tanya

McKool Smith | Tanya Wood
Senior Paralegal | Washington, D.C. | Tel: (202) 370-8331

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From: Fulghum, Roger <Roger.Fulghum@BakerBotts.com>
Sent: Thursday, November 2, 2023 7:25 PM
To: Tanya Wood <twood@McKoolSmith.com>; Speegle, Mark <mark.speegle@bakerbotts.com>;
Daniel.Anderson@andersonpatents.com; DL Greenthread, LLC v. onsemi <dlgreenthreadvonsemi@BakerBotts.com>
Cc: Greenthread-OnSemi-MS <Greenthread-OnSemi-MS@mckoolsmith.com>
Subject: RE: Semiconductor v. Greenthread IPR2023-01242, -01243 and -01244

Tanya,

We are having the same zip extraction error as last time. Can you post an unencrypted version to your FTP site and send me a link so that we can download it?

Thanks, Roger

From: Tanya Wood <twood@McKoolSmith.com>

Sent: Thursday, November 2, 2023 6:07 PM

To: Fulghum, Roger <Roger.Fulghum@BakerBotts.com>; Speegle, Mark <mark.speegle@bakerbotts.com>;
Daniel.Anderson@andersonpatents.com; DL Greenthread, LLC v. onsemi <dlgreenthreadvonsemi@BakerBotts.com>

Cc: Greenthread-OnSemi-MS <Greenthread-OnSemi-MS@mckoolsmith.com>

Subject: Semiconductor v. Greenthread IPR2023-01242, -01243 and -01244

[EXTERNAL EMAIL]

Counsel,

Courtesy copies of today's filings in the above-captioned *inter partes* review matters are attached herewith.

The password will follow separately.

Please let me know if you have any difficulties accessing these documents.

Thank you.

Tanya

McKool SMITH

Tanya Wood
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Washington, D.C.
Tel: (202) 370-8331
www.mckoolsmith.com

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