

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

MONOLITHIC POWER SYSTEMS, INC.

Petitioner

v.

GREENTHREAD, LLC,

Patent Owner

IPR2024-00468 (Patent No. 8,421,195)

IPR2024-00469 (Patent No. 9,192,502)

IPR2024-00470 (Patent No. 11,121,222)

IPR2024-00550 (Patent No. 10,510,842)

IPR2024-00551 (Patent No. 10,734,481)

IPR2024-00552 (Patent No. 11,121,222)

IPR2024-00553 (Patent No. 11,316,014)

DEPOSITION OF CARLY SUMMERS

APPEARING REMOTELY

July 29, 2025

4:00 p.m.

Reported by: Eileen Mulvenna, CSR/RMR/CRR/RDR

DIGITAL EVIDENCE GROUP

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1 REMOTE DEPOSITION of CARLY SUMMERS, a
2 witness on behalf of the Petitioner in the
3 above-titled action, held on July 29, 2025,
4 commencing at approximately 4:00 p.m., before Eileen
5 Mulvenna, CSR/RMR/CRR/RDR, Certified Shorthand
6 Reporter, Registered Merit Reporter, Certified
7 Realtime Reporter, Registered Diplomat Reporter,
8 and Notary Public of the State of New York.

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1 A P P E A R A N C E S:

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I N D E X

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WITNESS

EXAMINATION BY

PAGE

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CARLY SUMMERS

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MR. HEJNY

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1 THE REPORTER: Before I swear in the
2 witness, do all counsel stipulate to the
3 witness being sworn in remotely?

4 MR. HEJNY: Yes.

5 MR. ESTERHAY: Yes.

6 THE REPORTER: Counsel, please state
7 your appearance and whom you represent for
8 the record.

9 MR. HEJNY: This is Scott Hejny,
10 McKool Smith, on behalf of Greenthread. And
11 with me is my colleague Brandon Merrill.

12 MR. ESTERHAY: This is John Esterhay
13 of Perkins Coie. I represent the petitioner,
14 Monolithic Power Systems, Incorporated, as
15 well as the witness, Ms. Carly Summers.

16 CARLY SUMMERS,
17 having been duly sworn by Eileen Mulvenna,
18 a Notary Public of the State of New York,
19 was examined and testified as follows:

20 EXAMINATION

21 BY MR. HEJNY:

22 Q. Good afternoon, Ms. Summers. Have you

1 been deposed before?

2 A. Yes.

3 Q. How many times?

4 A. Twice.

5 Q. And when did those depositions take
6 place?

7 A. One maybe 20 years ago. The other,
8 maybe ten.

9 Q. Did any -- either of those depositions
10 involve patent disputes?

11 A. No.

12 Q. But you understand the roadmap for
13 depositions. I'll ask you some questions. And if
14 you don't understand them, you can ask for
15 clarification. And unless your counsel instructs
16 you not to answer, you agree to answer those
17 questions?

18 A. Yes.

19 Q. And we'll try to take a break about
20 every hour. If you need a break before then, just
21 let me know. And unless there's a question pending
22 on the table, we will be happy to take a break at

1 your convenience. Okay?

2 A. Okay.

3 Q. Where are you located today?

4 A. Kirkland, Washington.

5 Q. Are you in Monolithic Power Systems'
6 office, or are you with counsel?

7 A. I am in the Monolithic Power Systems
8 offices.

9 Q. Is there anyone in the room with you
10 today?

11 A. Yes.

12 Q. Do you have any documents in front of
13 you today as part of the deposition process?

14 A. No.

15 Q. You don't have a copy of your
16 declaration with you?

17 A. I do not.

18 Q. Okay. And do you have any other
19 documents open on the computer screen on which
20 you're being videoed for the deposition?

21 A. No.

22 Q. What did you do to prepare for your

1 deposition?

2 A. I reviewed my declaration. And I
3 reviewed the -- the product list for the accused
4 products, as instructed by the PTAB. And I talked
5 with Mr. Esterhay in preparation for, you know, the
6 topics that we were going to cover today for my
7 declaration.

8 Q. About how long did you spend preparing
9 for your deposition?

10 A. A couple of hours.

11 Q. And you mentioned that you met with
12 counsel. Did you meet with counsel yesterday?

13 A. Yes.

14 Q. Was that your only meeting to prepare
15 for your deposition?

16 A. Yes.

17 Q. Were you shown any documents during
18 your -- strike that.

19 Were you shown any documents during
20 your deposition preparation that refreshed your
21 recollection?

22 A. Yes, the -- again, the PTAB, the --

1 what I was directed to look at for the accused parts
2 and, of course, my declaration.

3 Q. Did you see any other documents in
4 your meeting yesterday that refreshed your
5 recollection?

6 A. No.

7 Q. I'm going to upload a copy of your
8 declaration. Give me just a moment.

9 Okay. I've uploaded a copy of your
10 declaration into the chat. If you could, download
11 it and open that document.

12 A. Okay.

13 Q. Take a second to review that document
14 and let me know if that is the declaration that you
15 submitted in this case.

16 (Document review.)

17 THE WITNESS: Yes, it appears to be.

18 BY MR. HEJNY:

19 Q. Did you draft this declaration in its
20 entirety?

21 A. Yes, with the assistance of counsel.

22 Q. Did you choose the wording for each

1 and every paragraph of this declaration?

2 A. Yes, with the assistance of counsel.

3 Q. How much time did you spend in
4 preparing your declaration?

5 A. Maybe a couple of hours.

6 Q. Roughly two hours?

7 A. Uh-huh.

8 Q. When did you first learn that you're
9 going to be a witness on behalf of Monolithic Power
10 Systems, submitting this declaration?

11 A. A few weeks ago, I guess.

12 Q. So sometime in late June 2025?

13 A. Uh-huh.

14 THE REPORTER: Is that yes?

15 THE WITNESS: Yes. I'm sorry. Yes.

16 BY MR. HEJNY:

17 Q. And on the front page of your
18 declaration, there are a number of proceedings
19 listed, beginning with IPR2024.

20 When did you first become aware of
21 these IPR proceedings?

22 A. Hmm, I guess the list -- the full

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1 listing, when we drafted the declaration, but do you
2 mean the suits themselves?

3 Q. Yes. When did you first become aware
4 of the IPR petitions themselves?

5 A. That would have been when they were
6 filed.

7 Q. Have you been involved in the IPR
8 process between Greenthread and Monolithic Power
9 Systems?

10 A. Not directly.

11 Q. Have you reviewed any of the briefs
12 submitted by Greenthread in connection with these
13 IPR proceedings?

14 A. No.

15 Q. Have you reviewed any briefs submitted
16 by Monolithic Power Systems in connection with these
17 IPR proceedings?

18 A. Maybe one.

19 Q. Which brief was that?

20 A. I can't recall. I believe it was a
21 reply brief of some kind, but I'm not sure.

22 Q. Did you review the PTAB board's order

1 that ordered additional discovery in these IPR
2 proceedings?

3 A. Yes.

4 Q. And as part of preparing this
5 declaration, did you conduct an investigation so
6 that you could provide responses in this
7 declaration?

8 A. Yes.

9 Q. And what did you do as part of that
10 investigation?

11 A. So as part of that investigation,
12 there were two areas of inquiry that the PTAB
13 requested. One was to search for certain types of
14 agreements. The other was to confirm when we had
15 knowledge -- both me as well as the company had
16 knowledge of the under- -- prior Intel lawsuit. So
17 I undertook those -- those two investigations.

18 Q. About how long did you spend searching
19 for agreements between Monolithic Power Systems and
20 Intel?

21 A. Maybe -- probably, I would say, about
22 an hour and a half.

1 Q. How long did you spend investigating
2 Monolithic Power Systems' knowledge of the Intel
3 litigation?

4 A. Around the same. So I spent about
5 half of a day total.

6 Q. And did you spend time reviewing the
7 products listed in Exhibit 2005 as part of your
8 investigation?

9 A. Yes.

10 Q. About how long did you spend
11 investigating the products listed in Exhibit 2005?

12 A. I reviewed the list, as requested by
13 the PTAB.

14 Q. And how long did you spend in that
15 process?

16 A. Maybe 20 minutes, 30 minutes.

17 Q. I'm going to go ahead and upload that
18 exhibit just so that we're not discussing it without
19 showing it to you.

20 A. Sure.

21 Q. Okay. The document is showing that it
22 was uploaded. If you could, when you have it,

1 double-click it and open it.

2 A. Okay.

3 Q. And is this the exhibit that we've
4 been discussing, Exhibit 2005, in which you reviewed
5 a list of Intel products?

6 (Document review.)

7 THE WITNESS: Yes.

8 BY MR. HEJNY:

9 Q. When you were searching for agreements
10 as part of your investigation, did you speak with
11 anyone else at Monolithic Power Systems?

12 A. Yes. I mentioned the request.

13 Q. What do you mean, you mentioned the
14 request?

15 A. We have a small internal legal team.
16 So I mentioned what I was doing, to others in the
17 legal department.

18 Q. Did you perform the search for
19 agreements, or did someone else perform that search
20 at your direction?

21 A. The search for agreements, I
22 personally conducted.

1 Q. And when it comes to knowledge of the
2 Intel litigation, you had to engage IT for some of
3 that process; correct?

4 A. That's correct.

5 Q. So you performed that search with
6 assistance of others at MPS?

7 A. Yes.

8 Q. Is it okay -- is it okay if I refer to
9 Monolithic Power Systems as MPS in this deposition?
10 You'll know what I'm talking about?

11 A. Of course, yes.

12 Q. Otherwise, at some point, I'm going to
13 get tongue-tied and get it wrong.

14 Now, what did you do as part of your
15 investigation regarding the Intel products listed on
16 pages 5, 6 and 7 of Exhibit 2005?

17 A. I reviewed the listing closely. I
18 referred to the order to ensure that I was doing
19 what I had been asked to do to review the list.

20 Q. What did you do to confirm your
21 statement that petitioner did not sell to Intel or
22 supply Intel with any of the Intel accused products?

1 A. I guess the main confirmation of that
2 statement was to confirm that I did not have record
3 of any sales agreements with Intel for those
4 products.

5 Q. Does MPS sell products directly to
6 entities like Intel?

7 A. Entities like Intel. We do have some
8 direct sale relationships with customers; but for
9 the most part, no. That would be the exception for
10 our business model. For the most part, we have
11 indirect sales model.

12 Q. Does MPS sell any products directly to
13 Intel?

14 A. No, not that I found.

15 Q. And what did you do to confirm that
16 there were no direct sales between MPS and Intel?

17 A. Again, I checked our records to
18 confirm whether I had sales agreements in place with
19 Intel, to confirm whether they were a direct
20 customer, and found none.

21 Q. Does MPS sell products indirectly to
22 Intel?

1 MR. ESTERHAY: Objection, vague.

2 THE WITNESS: I don't know.

3 BY MR. HEJNY:

4 Q. Does Intel use MPS or MPS products in
5 its systems?

6 MR. ESTERHAY: Objection, vague.

7 THE WITNESS: Maybe.

8 BY MR. HEJNY:

9 Q. Did you do any investigation to
10 determine which MPS products are used in Intel
11 systems?

12 A. The premise assumes they do. I don't
13 have knowledge of that. So no, I did not.

14 Q. Referring to your declaration at
15 paragraph 8, the second sentence of paragraph 8
16 says, "Consequently, petitioner was not the supplier
17 to Intel of any product or component of a product
18 accused of infringement in the Intel litigation."

19 Do you see that?

20 A. Yes.

21 Q. What did you do to confirm that no MPS
22 component -- strike that.

1 What did you do to determine that no
2 MPS product or MPS component is used in the Intel
3 processors listed in Exhibit 2005?

4 A. The statement says petitioner was not
5 the supplier to Intel of any product. I wouldn't
6 have knowledge or the ability to confirm whether our
7 product was used, but we were not the supplier to
8 Intel of any of the accused products, certainly.

9 Q. Did you do any investigation to
10 determine whether any MPS products or components are
11 used in the Intel accused products?

12 A. Yes. As I mentioned, I confirmed that
13 there were no sales agreements between MPS and
14 Intel. And there were none.

15 Q. Did you do any further investigation
16 beyond examining whether there were any sales
17 agreements between MPS and Intel?

18 A. No.

19 Q. Did you contact Intel and ask them if
20 there were any MPS parts in the products listed on
21 pages 5 through 7 of Exhibit 2005?

22 A. No.

1 Q. Did you, in your capacity as in-house
2 counsel, communicate with Intel?

3 A. I have not.

4 Q. Are there engineers at MPS that
5 communicate with Intel?

6 MR. ESTERHAY: Objection, calls for
7 speculation.

8 THE WITNESS: I don't know.

9 BY MR. HEJNY:

10 Q. Did you contact anyone in sales or
11 engineering at MPS and ask them, "Do we provide any
12 components that are used in certain Intel
13 processors, such as the ones listed on pages 5
14 through 7 of Exhibit 2005"?

15 A. No. By "provide," I guess, what do
16 you mean? I confirmed that MPS does not sell
17 products to Intel.

18 Q. Do you know whether or not MPS
19 components are included in Intel devices?

20 A. No.

21 Q. Did you reach out to anyone in sales
22 or engineering at MPS to find out whether or not MPS

1 components are included in Intel devices?

2 A. No.

3 Q. You have a statement in parentheses at
4 the bottom of paragraph 8 where you state, "By way
5 of background, petitioner's principal customers are
6 contract manufacturers located in Asia rather than
7 downstream branded companies such as Intel."

8 Do you see that?

9 A. Yes.

10 Q. What are contract manufacturers?

11 A. Contract manufacturers produce
12 components using -- when they are customers of MPS,
13 using our products. And those -- their products are
14 then sold to downstream customers of the -- of the
15 CM, of the contract manufacturers.

16 Q. Is MPS a fabless manufacturer?

17 A. Yes.

18 Q. And are the contract manufacturers
19 you're referring to fab shops in Asia?

20 A. They can be, yes.

21 Q. And you mentioned contract
22 manufacturers located in Asia.

1 Are there contract manufacturers
2 located anywhere else?

3 A. They can be.

4 Q. Where?

5 A. I would be guessing their locations.

6 Q. So you don't know as you sit here
7 today?

8 A. No.

9 Q. So does MPS send certain designs to
10 fab shops in Asia where MPS products are
11 manufactured?

12 A. It depends on the specific
13 relationship. They could -- we could.

14 Q. Well, just explain to me, you know,
15 generally how MPS translates designs into physical
16 components.

17 A. Sure. It seems beyond -- but okay.

18 So as a general matter, it can happen
19 in a number of ways. But we're a component part,
20 obviously. So we would work with contract
21 manufacturers to design into parts that they are
22 selling. And they become our customer.

1 So yes, we provide our technology to
2 the CM. And then they have their own customers, and
3 they sell those products to them. So that's how
4 this would work, in the most basic terms.

5 Q. So the contract manufacturer would
6 sell to downstream branded companies such as Intel?

7 A. They might.

8 Q. Does MPS track sales from contract
9 manufacturers to companies like Intel?

10 A. I don't know.

11 Q. Did you look into that as part of your
12 investigation?

13 A. No.

14 Q. Are there any contract manufacturers
15 located in the United States?

16 A. I'm sure there are contract
17 manufacturers located in the United States.

18 Q. But you're not aware of any by name as
19 we sit here today?

20 A. Correct.

21 Q. You state that petitioner's principal
22 customers are contract manufacturers located in Asia

1 rather than downstream branded companies such as
2 Intel.

3 So you're obviously aware of the
4 contract manufacturers in Asia; correct?

5 A. Yes.

6 Q. Did you do anything to investigate
7 sales from any of those contract manufacturers to
8 other entities, including Intel?

9 A. No.

10 Q. Do you know whether Sony is a
11 customer -- downstream customer of MPS?

12 A. No.

13 Q. Do you know whether Dell is a
14 downstream customer of MPS?

15 A. No.

16 Q. Does MPS ever design products
17 specifically for use with Intel processors?

18 MR. ESTERHAY: Objection, vague.

19 THE WITNESS: I don't know.

20 BY MR. HEJNY:

21 Q. So outside of researching whether
22 there were sales agreements between MPS and Intel,

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1 did you do any investigation at all as to how MPS
2 products are integrated with Intel processors?

3 A. No.

4 Q. Do you know whether certain elements
5 of MPS processors are included in Intel processors?

6 MR. ESTERHAY: Objection, vague.

7 THE WITNESS: I don't know.

8 BY MR. HEJNY:

9 Q. And looking at Exhibit 2005, if you
10 could turn to page 5.

11 Let me know when you're there.

12 A. Okay.

13 Q. And under the left-hand column,
14 there's a section titled 12th Generation, open
15 quote --

16 (The reporter seeks clarification.)

17 BY MR. HEJNY:

18 Q. On the left-hand side of the page,
19 there is a column heading that reads "12th
20 Generation 'Alder Lake' Intel Products."

21 Do you see that column?

22 A. Yes.

1 Q. And the first item listed in that
2 column, Number 1, is Intel Core i5-12400.

3 Do you see that?

4 A. Yes.

5 Q. Do you know whether the Intel Core
6 i5-12400 processor includes any elements designed or
7 manufactured by Monolithic Power Systems?

8 MR. ESTERHAY: Objection, vague.

9 THE WITNESS: No, I don't know.

10 BY MR. HEJNY:

11 Q. The second item listed is Intel Core
12 i5-12400F.

13 Do you see that?

14 A. Yes.

15 Q. Do you know whether the Intel Core
16 i5-12400F processor includes any components designed
17 or manufactured by Monolithic Power Systems?

18 MR. ESTERHAY: Objection, vague.

19 THE WITNESS: No, I don't know.

20 BY MR. HEJNY:

21 Q. And would your answer be the same for
22 the rest of the processors listed on pages 5 through

1 7 of Exhibit 2005?

2 A. Yes.

3 Q. Did you contact Intel and ask them if
4 any of these processors listed in Exhibit 2005
5 include any components or elements designed or
6 manufactured by MPS?

7 A. No.

8 Q. Have you ever seen a parts list for
9 any of these processors?

10 A. No.

11 Q. Do you know if anyone in-house at MPS
12 has a parts list for any of these processors?

13 A. I don't know.

14 Q. Does MPS ever do custom design work
15 for Intel?

16 MR. ESTERHAY: Objection, vague.

17 THE WITNESS: I don't know. I'm not
18 sure how answer that. I don't know.

19 BY MR. HEJNY:

20 Q. Well, MPS manufactures elements like
21 multiphase controllers to control power supply to
22 microprocessors; is that correct?

1 A. Yes.

2 Q. Does MPS work with Intel to ensure
3 that its products are compatible with the Intel
4 processors?

5 MR. ESTERHAY: Objection, vague.

6 THE WITNESS: Not that I know of.

7 BY MR. HEJNY:

8 Q. Is there someone at MPS that would
9 know the answer to that question?

10 A. I don't know. The question doesn't
11 clarify whether this relates to the accused parts or
12 any parts. So I'm not sure. I don't know.

13 Q. Yes. I'm asking a very general
14 question.

15 MPS manufactures parts to be used in
16 conjunction with Intel processors; right?

17 MR. ESTERHAY: Objection, vague.

18 THE WITNESS: I don't know.

19 BY MR. HEJNY:

20 Q. Did you ask that question of anyone at
21 MPS when you were preparing your declaration?

22 A. No.

1 Q. Does MPS have any subsidiaries or
2 affiliates?

3 A. Yes.

4 MR. ESTERHAY: Objection, vague.

5 THE WITNESS: Yes.

6 BY MR. HEJNY:

7 Q. And who are MPS's subsidiaries?

8 MR. ESTERHAY: Objection, vague.

9 THE WITNESS: We are a large
10 multinational company, so we have a corporate
11 structure with affiliates and subsidiaries.

12 BY MR. HEJNY:

13 Q. Does MPS consider contract
14 manufacturers to be subsidiaries?

15 A. No.

16 Q. Does MPS consider contract
17 manufacturers to be affiliates?

18 A. No.

19 Q. Did you do any investigation to
20 determine whether any MPS subsidiaries or affiliates
21 sell products to Intel?

22 A. Yes. My inquiries include all records

1 for any of the corporate entities under our parent
2 corporation, Monolithic Power Systems, Inc.

3 Q. So when you did your search for direct
4 sales agreements between MPS and Intel, that would
5 have encompassed any direct sales agreements between
6 MPS subsidiaries and affiliates with Intel?

7 A. Yes.

8 Q. Do any MPS subsidiaries or affiliates
9 sell products indirectly to Intel?

10 A. I don't know.

11 Q. Do MPS subsidiaries or affiliates also
12 use contract manufacturers when manufacturing MPS
13 parts?

14 A. Yes.

15 Q. Are those the same contract
16 manufacturers that we discussed before, or are they
17 different?

18 A. The same, to my knowledge.

19 Q. To the best of your knowledge, are
20 there any MPS subsidiaries or affiliates that you
21 didn't investigate when it comes to direct sales
22 from MPS to Intel?

1 A. No.

2 Q. And what is your current role at MPS?

3 A. Senior corporate counsel.

4 Q. Are you responsible for negotiating
5 contracts with vendors?

6 A. Yes, some. Yes.

7 Q. Are you responsible for negotiating
8 sales contracts to companies that MPS supplies?

9 A. Yes.

10 Q. Are you responsible for negotiating
11 any contracts between contract manufacturers and
12 downstream purchasers?

13 A. No.

14 Q. Do you know the terms and conditions
15 of the purchase agreements between contract
16 manufacturers and downstream purchasers?

17 A. No.

18 Q. Give me an example of a company to
19 which MPS sells directly.

20 A. I couldn't do that without looking at
21 the specific agreements because most of them contain
22 a clause that does not allow me to disclose that.

1 Q. So you can't answer my question today?

2 A. No, not without seeing the specific
3 agreement to ensure that I'm allowed to disclose
4 that information under the agreement itself.

5 Q. For direct sale agreements, does MPS
6 include an indemnity clause against patent
7 infringement?

8 A. In every case? Is that your question?

9 Q. Yes.

10 A. No.

11 Q. Are there some instances in which MPS
12 sells product to a direct purchaser in which the
13 contract includes an indemnity clause against patent
14 infringement?

15 A. Yes.

16 Q. How long have you been at MPS?

17 A. Four years.

18 Q. Have you ever seen a direct purchaser
19 seek indemnity from MPS for a claim of patent
20 infringement?

21 A. I'm sorry. Ask me that again.

22 Q. Sure.

1 Have you ever seen an instance in
2 which a direct purchaser from MPS has sought
3 indemnity from MPS for a claim of patent
4 infringement?

5 A. No.

6 Q. Does MPS have any control over the
7 sales contracts between contract manufacturers and
8 downstream purchasers like Intel?

9 A. No.

10 Q. Do the contract manufacturers handle
11 those sales agreements?

12 A. Yes.

13 Q. Can you give me the name of any of the
14 contract manufacturers that are located in Asia?

15 A. No, not off the top of my head.

16 Q. So as you're sitting here today, you
17 just don't know whether any of MPS's contract
18 manufacturers have sold MPS products to Intel?

19 A. Correct. I don't know.

20 Q. Now, when MPS sends product designs to
21 contract manufacturers, does MPS own the
22 intellectual property in that product design?

1 MR. ESTERHAY: Objection, calls for a
2 legal conclusion.

3 THE WITNESS: It would depend.

4 BY MR. HEJNY:

5 Q. What would it depend on?

6 A. The specific product.

7 Q. Can you give me an example of a
8 specific MPS product that when MPS sends the designs
9 to the contract manufacturer for production, that
10 MPS owns the intellectual property rights?

11 A. No, I can't give a specific product
12 number.

13 Q. Any specific category of products?

14 A. No.

15 Q. Can you give me an example of an MPS
16 product or product line that when MPS sends the
17 designs to the contract manufacturer for production,
18 that MPS does not own the intellectual property
19 rights?

20 A. No.

21 Q. What specific products does MPS
22 manufacture?

1 MR. ESTERHAY: Objection, vague.

2 THE WITNESS: I -- I'm not sure how to
3 answer -- what specific products do we
4 manufacture?

5 BY MR. HEJNY:

6 Q. Sure. What -- just in general, what
7 types of products does MPS sell?

8 MR. ESTERHAY: Objection, vague.

9 THE WITNESS: Semiconductor products.

10 BY MR. HEJNY:

11 Q. Are all MPS products custom designs,
12 or are there some off-the-shelf products sold by
13 MPS?

14 MR. ESTERHAY: Objection, vague.

15 THE WITNESS: MPS sells some custom
16 products, some catalog or off-the-shelf
17 products.

18 BY MR. HEJNY:

19 Q. Are you aware of any instances in
20 which Intel came to MPS and asked them to design a
21 product for use with an Intel processor?

22 A. No.

1 Q. Is Intel a customer of MPS?

2 MR. ESTERHAY: Objection, vague.

3 THE WITNESS: I -- I don't know. Not
4 to my knowledge, based on my investigation.

5 MR. HEJNY: Let's take a quick break.
6 Let's go off the record.

7 THE REPORTER: We're off the record.
8 (Recess from the record.)

9 THE REPORTER: We're back on the
10 record.

11 BY MR. HEJNY:

12 Q. MPS -- strike that.

13 MPS provides power management
14 solutions for use with computer systems; correct?

15 MR. ESTERHAY: Objection, vague.

16 THE WITNESS: We -- we can.

17 BY MR. HEJNY:

18 Q. Are you aware of the specific elements
19 of MPS systems that interact -- interact with
20 microprocessors?

21 MR. ESTERHAY: Objection, vague.

22 THE WITNESS: No. It would be, I

1 guess, product dependent. I don't think

2 that's a question for me. No.

3 BY MR. HEJNY:

4 Q. Did you contact anyone at MPS in the
5 sales or engineering group in connection with your
6 investigation of the products listed on pages 5
7 through 7 of Exhibit 2005?

8 A. No.

9 MR. HEJNY: I have no further
10 questions. I'll pass the witness.

11 MR. ESTERHAY: Nothing further from
12 me. Thank you.

13 THE REPORTER: Okay. We're off the
14 record.

15 (The examination concluded. The time
16 is 5:00 p.m.)

17

18

19

20

21

22

1 STATE OF NEW YORK)
2 ss:
3 COUNTY OF WESTCHESTER)
4

5 I, EILEEN MULVENNA, CSR/RMR/CRR/RDR, a
6 Certified Court Reporter, Registered Merit Reporter,
7 Certified Realtime Reporter, Registered Diplomate
8 Reporter, and Notary Public in and for the State of
9 New York, do hereby certify:

10 That I reported the taking of the
11 deposition of the witness, CARLY SUMMERS,
12 commencing on the 29th day of July, 2025, at the
13 hour of 4:00 p.m.

14 That prior to being examined, the witness
15 was duly sworn by me to testify to the truth, the
16 whole truth, and nothing but the truth.

17 That I thereafter transcribed my said
18 shorthand notes into typewriting and that the
19 typewritten transcript of said deposition is a
20 complete, true and accurate transcription of my
21 said shorthand notes taken down at said time, and
22 that a request has been made to review the
23 transcript.

24 I further certify that I am not a relative
25 or employee of an attorney or counsel of any of the
26 parties, nor a relative or employee of any attorney
27 or counsel involved in said action, nor a person
28 financially interested in the action.

29 IN WITNESS WHEREOF, I have hereunto
30 set my signature this 29th day of July, 2025.

31
32
33
34
35
36
37


EILEEN MULVENNA, CSR/RMR/CRR/RDR

1 Carly Summers, c/o
2 Perkins Coie LLP
3 11452 El Camino Real, Suite 300
4 San Diego, California 92130-2080
5

6 Case: Monolithic Power Systems, Inc. v. Greenthread, LLC
7 Date of deposition: July 29, 2025
8 Deponent: Carly Summers
9

10

11 Please be advised that the transcript in the
12 above-referenced matter is now complete and
13 ready for signature.

14 The deponent may come to this office to sign the
15 transcript, a copy may be purchased for the
16 witness to review and sign, or the deponent
17 and/or counsel may waive the option of
18 signing. Please advise us of the option
19 selected.

20 Please forward the errata sheet and the original
21 signed signature page to counsel noticing the
22 deposition, noting the applicable time period
allowed for such by the governing Rules of
Procedure. If you have any questions, please do
not hesitate to call our office at 202.232.0646.

23 Sincerely,

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Witness Name: Carly Summers

6 Deposition Date: July 29, 2025

7 I do hereby acknowledge that I have read

8 and examined the foregoing pages of the

9 transcript of my deposition and that:

10 (Check appropriate box):

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

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

19 _____

20 DATE WITNESS SIGNATURE

21 _____

22 DATE NOTARY

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7 Case: Monolithic Power Systems, Inc. v. Greenthread, LLC

8 Witness Name: Carly Summers

9 Deposition Date: July 29, 2025

10 Page No. Line No. Change

11

12

13

14

15

16

17

18

19

20

21

22

Signature

Date

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