

Filed on behalf of Western Digital Technologies, Inc.

By: Michelle E. Armond

Douglas R. Wilson

Joseph Li

Monica Arnold

Yue Han

ARMOND WILSON LLP

4685 MacArthur Court, Suite 390

Newport Beach, CA 92660

Telephone: (949) 932-0778

Email: ipr@armondwilson.com

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

WESTERN DIGITAL TECHNOLOGIES, INC.,
Petitioner,

v.

GODO KAISHA IP BRIDGE 1,
Patent Owner.

Case No. IPR2024-01494
U.S. Patent No. 11,968,909

PETITIONER'S OPPOSITION TO MOTION TO EXCLUDE EVIDENCE

TABLE OF CONTENTS

I.	IPB’S LEGAL STANDARD IS INCORRECT.....	1
II.	DR. BOKOR’S CHALLENGED OPINIONS	3
III.	DR. BOKOR IS QUALIFIED TO EXPLAIN HOW SKILLED PRACTITIONERS UNDERSTOOD BUTLER’S FIGURES 3 AND 4.....	6
	A. Dr. Bokor Is A Qualified Expert.....	6
	B. Dr. Bokor Is Qualified To Render The Challenged Testimony	8
IV.	DR. BOKOR’S METHODOLOGY IS RELIABLE	13
V.	DR. BOKOR’S TESTIMONY IS NOT LAY OPINION TESTIMONY SUBJECT TO RULE 701	15
VI.	CONCLUSION	15

TABLE OF AUTHORITIES

<i>Icon Health & Fitness v. Strava</i> , 849 F.3d 1034 (Fed. Cir. 2017).....	2, 3
<i>Schering v. Geneva Pharms.</i> , 339 F.3d 1373 (Fed. Cir. 2003).....	8
<i>SEB v. Montgomery Ward</i> , 594 F.3d 1360 (Fed. Cir. 2010).....	9
<i>Siemens Mobility v. Metrom Rail</i> , IPR2023-00470, 2024 WL 3045506 (P.T.A.B. June 18, 2024)	2, 9
<i>Sundance v. DeMonte Fabricating</i> , 550 F.3d 1356 (Fed. Cir. 2008).....	9
<i>Unified Patents v. Ideahub</i> , IPR2020-01388, 2022 WL 443888 (P.T.A.B. Feb. 7, 2022)	1, 2, 9

OTHER AUTHORITIES

37 C.F.R. § 42.20	2, 8
37 C.F.R. § 42.65	2
Fed. R. Evid. 701	15
Fed. R. Evid. 702	1, 9

All emphasis is added in quoted materials unless otherwise indicated.

IPB's Motion to Exclude is little more than a desperate re-run of IPB's disagreements with Dr. Bokor's reply declaration testimony about Butler's disclosure of data leading one of skill to conclude that changing tunnel barrier height would change TMR. This Motion does not overcome the high bar of excluding expert testimony, which is "rarely called for in a proceeding before the Board." *Unified Patents v. Ideahub*, IPR2020-01338, 2022 WL 443888, at *4 (P.T.A.B. Feb. 7, 2022) (citation omitted). Citing no Board decision and incorrectly assigning the burden to non-movant WD, IPB's disagreement with the substance of Dr. Bokor's reply testimony utterly fails to address any of Dr. Bokor's qualifications or to even attempt to meet its burden to prove he is unqualified to offer such opinions under Federal Rule of Evidence 702. IPB also misrepresents Dr. Bokor's testimony and his relied-upon evidence in a transparent effort to impugn his overwhelming qualifications and the reliability of his methodology. IPB utterly fails to carry its burden to show that its arguments are anything other than merits disputes directed to weight of the testimony rather than admissibility. Given these fundamental errors, IPB's frivolous Motion should be entirely denied.

I. IPB'S LEGAL STANDARD IS INCORRECT

IPB's Motion (Paper 43, "Mot.") is legally defective. It erroneously places the burden on WD to "demonstrate admissibility of Dr. Bokor's testimony." Mot., 8. Rather, it is *IPB's burden* as the "moving party... to establish that it is entitled to

the requested relief” of having certain of Dr. Bokor’s written testimony excluded. 37 C.F.R. § 42.20(c); *Siemens Mobility v. Metrom Rail*, IPR2023-00470, 2024 WL 3045506, at *32 (P.T.A.B. June 18, 2024) (same). And in bench proceedings such as this, exclusion of expert testimony is an extraordinary remedy rarely granted. *Unified Patents*, 2022 WL 443888, at *4.

IPB’s Motion is also silent as to *why* the gatekeeping function is necessary here in view of the Board’s discretion to weigh an expert’s testimony under 37 C.F.R. § 42.65(a). *See* Mot., 8. Indeed, IPB’s Motion does not cite a single Board opinion at all, completely ignoring and misrepresenting the applicable standard before the Board. *See generally* Mot., 8.

Contrary to IPB’s mischaracterization, “[t]he Board has broad discretion to assign weight to be accorded expert testimony.” Consolidated Trial Practice Guide (“CTPG”), 35. Indeed, “the policy considerations for excluding expert testimony, such as those implemented by the gatekeeping framework established by the Supreme Court in *Daubert* ... are less compelling in bench proceedings such as *inter partes* reviews than in jury trials.” *Unified Patents*, 2022 WL 443888, at *4 (citation omitted). The “PTAB is permitted to weigh expert testimony and other record evidence and, in so doing, rely on certain portions of an expert’s declaration while disregarding others.” *Icon Health & Fitness v. Strava*, 849 F.3d 1034, 1041 (Fed.

Cir. 2017). IPB offers no justification for the exclusion of Dr. Bokor’s testimony in view of the Board’s ability to weigh expert testimony.

II. DR. BOKOR’S CHALLENGED OPINIONS

By way of background, Dr. Bokor previously opined that “[t]o increase TMR of an MgO barrier, skilled artisans would have been motivated to explore lower barrier heights to facilitate tunneling of parallel electrons.” EX1024 (Bokor Decl.) ¶171. In response to statements by IPB’s declarant Dr. Ross that the Butler prior art (EX1044) does not support such a motivation to combine, EX1105 (Bokor Reply Decl.) ¶7, Dr. Bokor opined as follows, which IPB now moves to exclude:

- EX1105 ¶8; *see also id.* ¶12: Butler provides data motivating skilled practitioners “to explore lower barrier heights to improve TMR.”
- *Id.* ¶10: The density of states (DOS) data in Butler’s Figures 3 and 4 demonstrate “that a change in barrier height was expected to affect majority and minority channel tunneling” / “conductance.” Such a change in DOS and conductance could be effected by “changing the Fermi energy.”
- *Id.* ¶11: Again, “moving the level of the Fermi energy ... will have a significant impact on the densities of states of majority and minority electrons.”

Dr. Bokor illustrates that altering Fermi energy will result in a change in DOS/conductance (and hence TMR) by drawing a red line at different Fermi

energies in Butler’s Figures 3 and 4, which report energy on their X-axis and DOS on their Y-axis. EX1105 ¶¶10 (reproduced below).

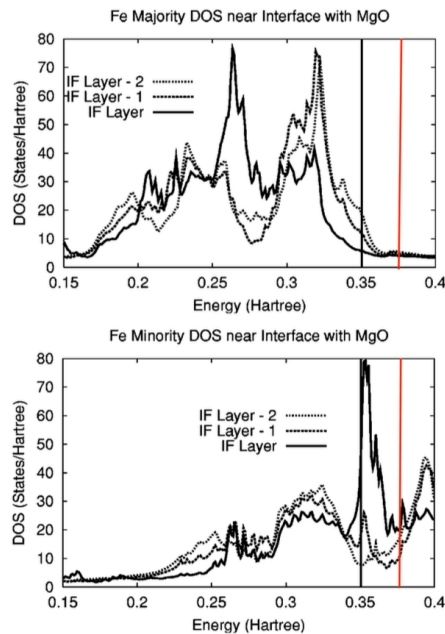


FIG. 3. Density of states for each atomic layer of Fe(100) near an interface with MgO. One hartree equals 27.2 eV.

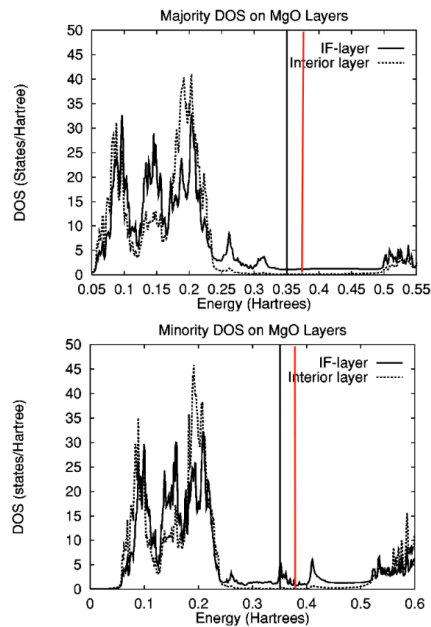


FIG. 4. Density of states for each of the atomic layers of MgO near an interface with Fe(100).

In its Motion, repeating arguments made in its Sur-reply, IPB attacks Dr. Bokor’s foregoing opinions as “meaningless.” Mot., 5; Paper 31 (IPB Sur-reply), 15; EX2087 (Ross Sur-reply Decl.) ¶¶8, 12, 28 (not “meaningful”). However, ***IPB’s declarant, Dr. Ross, largely agrees with these opinions:***

- Dr. Ross acknowledges that conductance is related to DOS. EX2053 (Ross Decl.) ¶¶36 (DOS “describes the number of electron states per interval of energy... available to be occupied by electrons”), 90 (“[T]he ***largest conductance***... is predicted to be via $\Delta 1$ state tunneling... ***due to the large DOS*** of majority $\Delta 1$ states...”); EX1107 (Ross Dep. Tr.), 24:16-25:18 (“Q. Okay. Why does the large

density of states of majority Delta 1 states in iron (100) indicate that the largest conductance... should be via Delta 1 state tunneling? A. Well, the conductance occurs by electrons tunneling, and that's where electrons are in that Delta 1 state.”).

- Dr. Ross acknowledges that DOS will change with Fermi energy level. EX2087 ¶¶25 (“The ‘effect’ that Dr. Bokor observes by drawing a line at an energy above the Fermi energy *can be seen* because Butler’s majority and minority density of states are different....”), 26 (“The exchange interaction in ferromagnetic [materials] results in a difference in the majority density of states... and the minority density of states... at the Fermi energy ..., and above and below the Fermi energy.”).
- And Dr. Ross acknowledges that changing Fermi energy level will alter the barrier height. EX2053 ¶¶45, 65 (barrier height depends on the Fermi level).

IPB’s Dr. Ross purports to disagree with Dr. Bokor’s ultimate conclusion that Butler’s Figures 3 and 4 therefore provide data that motivated skilled practitioners to change barrier height to alter DOS/conductance and improve TMR. However, Dr. Ross does so not because Butler failed to disclose such a relationship, but because this relationship already was known in the art even before Butler. EX2087 ¶¶24 (“Dr. Bokor does not allege that Butler’s Figure 3 DOS plots reveal a *new* relationship...”), 27 (“Butler’s Figure 3 density of states plots do not teach a *new*

relationship...”), 28 (“Dr. Bokor does not allege that there is any teaching in Butler that would have inspired a POSA to perform this exercise *for the first time* on Butler’s DOS plots...”), 29 (“Dr. Bokor’s explanation as to why the observed change in the density of states would change TMR also does not come from Butler but *from the decades-old* Julliere formula.”). Of course, IPB and Dr. Ross proffer no rationale why Butler’s re-iteration of known principles would no longer be motivational to skilled practitioners—nor is there any legal authority to support such a proposition.

Given Dr. Ross’ acquiescence to the logic leading to Dr. Bokor’s ultimate conclusion that Butler’s Figures 3 and 4 provide data that motivated skilled practitioners to change barrier height, IPB’s attempts to dismiss Dr. Bokor’s opinions in EX1105 ¶¶8, 10-12 as “meaningless,” Mot., 5, fail. And IPB’s failed argument cannot justify the rarely granted relief of excluding Dr. Bokor’s opinions.

III. DR. BOKOR IS QUALIFIED TO EXPLAIN HOW SKILLED PRACTITIONERS UNDERSTOOD BUTLER’S FIGURES 3 AND 4

A. Dr. Bokor Is A Qualified Expert

Dr. Bokor has extensive experience in the field of spintronics and magnetic tunnel junctions as well as nanoscale manufacturing. *See generally* EX1025 (Dr. Bokor’s CV). Prior to his university work, from 1980 to 1993 he was employed by AT&T Bell Laboratories where he “worked on semiconductor surface and interface physics, CMOS device physics, advanced lithography for integrated circuit manufacturing, and integrated circuit process technology.” EX1024 ¶5. He then

became a “Professor of Electrical Engineering and Computer Sciences (‘EECS’) at the University of California (UC), Berkeley, with a joint appointment as a Faculty Scientist in the Materials Science Division at the Lawrence Berkeley National Laboratory (‘LBNL’)” from 1993 until July 1, 2024. *Id.* ¶6. As he also explained and is not disputed, “I led the Nanoelectronics and Nanostructures research group at UC Berkeley, which focused on a wide range of topics, including magnetic tunnel junctions, voltage control of magnetism, spintronics, spin-based quantum computing, and ultrafast magnetism.” *Id.* ¶7. Dr. Bokor “demonstrated spin transfer torque switching in sub-10 nm size magnetic tunnel junctions and ultrafast spin-orbit torque based magnetic switching....” *Id.* He has published “at least 90 papers relating to magnetic and/or spin-based devices dating back to 2002” and has “12 patents in the areas of electronic devices, nanofabrication technologies, including 5 patents on magnetic memory and magnetic/spin-based devices.” *Id.* ¶8. Dr. Bokor has also supervised graduate students who were fabricating magnetic tunnel junctions. EX2013, 31:24-32:6. Dr. Bokor is more than qualified to testify regarding basic principles of magnetic tunnel junctions, such as the impact of changing Fermi level on tunnel barrier height.

IPB makes no effort to show any reason why Dr. Bokor’s professional and academic experience are insufficient to permit him to testify regarding the basic

principles of magnetic tunnel junctions, as was its burden under 37 C.F.R. § 42.20(c).

See generally Mot. Thus, its Motion should be denied.

B. Dr. Bokor Is Qualified To Render The Challenged Testimony

As discussed, Dr. Bokor’s opinions that IPB seeks to exclude interpret the teachings of Figures 3 and 4 in the Butler prior art from the viewpoint of skilled practitioners, which is the only legally relevant interpretation of Butler. Mot., 1 (citing EX1105 ¶¶8, 10-12); EX2086 (Bokor Dep. Tr.) 47:23-48:2 (“I give opinions on how a person of ordinary skill in the art would understand the high level teachings of this reference.”); *see also Schering v. Geneva Pharms.*, 339 F.3d 1373, 1377-78 (Fed. Cir. 2003) (interpreting reference “through the eyes of a person of ordinary skill in the art”).

IPB’s own declarant admits, with respect to Dr. Bokor’s logic interpreting Butler’s Figures 3 and 4 discussed above, that “*POSA could have performed this exercise*” even “without Butler.” EX2087 ¶28. IPB proffers no argument why, if a skilled practitioner could have performed this exercise, Dr. Bokor was unqualified to do so given his extensive and prestigious credentials in the field as outlined above. *Compare* EX2053 ¶¶29-30 (level of ordinary skill), *with* EX1025 (Bokor C.V.) at 1-2 (Ph.D. in electrical engineering and magnetic/spintronic device expertise), 6 (fellow of American Physical Society), and 8-36 *in passim* (publications in, *inter*

alia, Applied Physics Letters, Applied Physics Reviews, Physics Review B, Physical Review Materials, Physical Review Letters, and Journal of Applied Physics).

Indeed, Dr. Bokor’s foregoing expertise exceeds the undisputed qualifications of a skilled practitioner, thus supporting his qualification as an expert, as IPB’s own case recognizes. *Sundance v. DeMonte Fabricating*, 550 F.3d 1356, 1363 (Fed. Cir. 2008) (“[O]ur opinion should not be read as suggesting that Rule 702 requires a witness to possess something more than ordinary skill in the art to testify as an expert. A witness possessing merely ordinary skill will often be qualified to present expert testimony....”); *see also Unified Patents*, 2022 WL 443888, at *6 (“To be qualified to offer expert testimony on issues from the vantage point of an ordinarily skilled artisan in a patent case, an expert must at a minimum possess ordinary skill in the art.” (citation omitted)); *Siemens Mobility*, 2024 WL 3045506, at *32 (“[T]here is no requirement of a perfect match between the expert’s personal knowledge... and the opinions being provided in litigation; all that is needed is ‘an adequate relationship between his experience and the claimed invention.’” (citation omitted)); *SEB v. Montgomery Ward*, 594 F.3d 1360, 1372-73 (Fed. Cir. 2010) (not an abuse of discretion to permit expert in polymer materials to opine about deep fryer designs).

Nevertheless, IPB repeatedly challenges Dr. Bokor’s qualifications on the basis of his frank acknowledgement that he does “not have the level of expertise

required to analyze and evaluate [Butler's] gory details," as IPB already argued in its Sur-reply. Mot., 9 & Paper 31, 13-14 (both citing EX2086, 48:3-16); *see also* Mot., 2, 3, 9, 11. "Gory details" refers to "every little number that [Butler] put in his model," such as an empty sphere of radius 0.9476 Å. EX2086, 46:18-48:16. IPB offers no reason why expertise in "every little number" *input* to Butler's mathematical model is required to opine on skilled practitioners' understanding of Figures 3 and 4 *output* by that model. Mot., 5 ("Figs. 3-4 [] show the *result* of Butler's model-based calculations."); EX1044, 2-3 ("The electronic density of states (DOS) was calculated...").

IPB next challenges Dr. Bokor's qualifications based on his acknowledgment that he is "not an expert in *this*," as IPB again repeats from its Sur-reply. Mot., 9 & Paper 31, 16 (both citing EX2086, 56:4-15; *see also* Mot., 4, 6, 11. "This" refers to generating "a different physical model than Butler used"—namely, a model with oxygen vacancies in the MgO barrier layer. EX2086, 56:4-15. IPB repeatedly argues that skilled practitioners needed to replicate Butler's calculations but at different Fermi energies and whilst accounting for the presence of oxygen defects to *know* whether lowering barrier height by introducing oxygen defects would increase TMR before they would be motivated to do so. Mot., 6, 11 ("To understand what (if any) impact a 'lower' barrier height resulting from MgO defects would have had on TMR, POSAs would have needed to develop a *different model* than Butler's."

(emphasis in original)); Paper 31, 16 (same); *see also* Mot., 4. IPB similarly contends that to “predict” or “calculate” TMR, a reliable physical model such as that used by Butler is needed. Mot., 3, 5. IPB concludes that because Dr. Bokor does not have expertise sufficient to revise Butler’s model to account for oxygen defects, he is unqualified to opine concerning skilled practitioners’ understanding of what Butler’s Figures 3 and 4 would show if oxygen defects were present. Mot., 11 (“Developing a more complicated model to address MgO defects was beyond Bokor’s capabilities.”); *see also* Mot., 4, 6.

IPB overlooks that Dr. Bokor relied on Giordano for the knowledge one of skill would bring to Butler’s Figures 3 and 4: “Giordano is representative of one of skill’s knowledge in 2004 that introducing oxygen vacancy defects in the MgO(001) barrier layer would, among other things, increase the height of the Fermi energy in the adjoining electrode, thus decreasing the barrier height, which depends on the Fermi energy.” EX1105 ¶9. (IPB does not move to exclude this affirmative testimony.) As Dr. Bokor explained, application of this principle to Butler’s Figures 3 and 4 did not provide a definitive quantification of TMR but would predict a change in TMR:

Although Butler’s calculations would need to be repeated to see what would happen to the densities of states in Figures 3 and 4 with the change in Fermi level, one of skill in the art would understand the Fermi energy level shift depicted in red would result in a significant change in

the densities of states available in the majority and minority channels, even if it is not quite as simple as moving the energy level on the static Figures 3 and 4. TMR directly results from the difference in spin polarizations (majority versus minority) of the two electrodes, which in turn directly results from the difference in densities of states....

EX1105 ¶11.

Dr. Bokor’s opinion relies on neither teachings from a hypothetical oxygen defect model nor calculations that lowering barrier height would decrease TMR. Rather, Dr. Bokor opined and testified on the basis of Butler’s Figures 3 and 4 that skilled practitioners knew that shifting the Fermi energy would change the densities of states and were motivated to explore whether that change would increase TMR. EX1105 ¶11; EX2014, 216:15-17 (“[I]f I think that there’s a 50/50 chance I’m going to get the improvement that I’m looking for, boy, oh, boy, I’m going to try that.”). Mathematical calculations by a different model adapted to account for oxygen defects are not necessary to extend in this way the teachings Butler already provided. EX2014, 213:3-214:7 (“So you would explore lowering the barrier height to see what effect it would have on tunneling of parallel electrons. I think that’s the motivation of a person of ordinary skill. I’m not sure the person of ordinary skill would sit back and start *calculating* probabilities.”). No further “complicated,” Mot., 2, 4, 6, 10, 11, or “very advanced level of theory,” Mot., 2, 10, is needed, as

IPB's argument would require, given the disclosure already provided in Butler's Figures 3 and 4.

In sum, IPB argues that Dr. Bokor's inability to evaluate all of Butler's "details" or replicate Butler's calculations prevents him from opining on Butler at all. Mot., 12. Under this standard, even IPB's own declarant Dr. Ross would be disqualified from opining on Butler, as Butler relies heavily on the layer Korringa-Kohn-Rostoker computational technique with which she has no expertise. EX1044, 2 (LKKR); EX1107, 32:18-33:10 ("I personally haven't coded with that technique. ... I haven't studied it particularly...."). IPB offers no valid rationale that Dr. Bokor was unqualified to opine (at EX1105 ¶¶ 8, 10-12) that skilled practitioners understood Butler's Figures 3 and 4 as teaching different densities of state at different energies and changing densities of states and thus TMR by altering the Fermi energy.

IV. DR. BOKOR'S METHODOLOGY IS RELIABLE

IPB repeats its foregoing argument about replicating Butler's calculations to further contend that Dr. Bokor's opinions at EX1105 ¶¶ 8, 10-12 are not the result of "reliable application of reliable principles." Mot., 12-15. IPB attacks the substance of Dr. Bokor's opinions regarding moving the Fermi level in Butler's Figures 3 and 4, asserting that according to IPB's declarant doing so is insufficient "for determining the impact of barrier height on TMR." Mot., 13 (citing EX2087). IPB

also repeats its contention that Dr. Bokor instead needed to replicate Butler’s mathematical calculations using a model altered to account for defects in the MgO layer, which Dr. Bokor lacked expertise to do. Mot., 13-14. Again, IPB briefed this argument previously in its Sur-reply. Paper 31, 12-17.

IPB is wrong that “[i]t is undisputed that to understand what (if any) impact a ‘lower’ barrier height resulting from MgO defects would have had on TMR, POSAs would have needed to develop a *different model*” and repeat Butler’s calculations. Mot., 14 (emphasis in original). In fact, Dr. Bokor opined and testified that if MgO defects were introduced to lower the barrier height, skilled practitioners knew on the basis of Butler’s Figures 3 and 4 that the densities of states would change “significant[ly],” EX1105 ¶11; “[c]hanging the density of states will unquestionably change TMR,” EX2086 114:13-14, 122:19-21; “TMR had to change,” EX2013, 154:1-8; and “some change in the TMR, not just zero” would occur, EX2014, 215:3-4. Dr. Bokor further testified that skilled practitioners would “find [a] teaching” to change barrier height in Butler even if it is not stated explicitly, EX2086, 65:20-24, and skilled practitioners “expect a change in TMR with barrier height” in view of Butler, *id.* 10:21-11:5. Dr. Bokor’s foregoing opinions squarely contradict IPB’s argument that a different model was needed to know merely whether TMR would change with barrier height. According to Dr. Bokor, all that was needed was Butler’s Figures 3 and 4. (And according to IPB’s Dr. Ross, skilled practitioners knew this

even absent Butler. EX2087 ¶¶24-29.). IPB’s disagreement with Dr. Bokor’s opinion does not render it unreliable or inadmissible.

V. DR. BOKOR’S TESTIMONY IS NOT LAY OPINION TESTIMONY SUBJECT TO RULE 701

Because Dr. Bokor’s testimony is not lay opinion testimony, the application of Rule 701 is irrelevant to its admissibility. *See* Mot., 15.

VI. CONCLUSION

“A motion to exclude... may not be used to challenge the *sufficiency* of the evidence....” CTPG, 79. IPB improperly does just that in its Motion by repeating arguments already presented in its Sur-reply under the guise of attacking Dr. Bokor’s qualifications as an expert and the reliability of his opinions. *See, e.g.*, Mot., 5-8. But as shown, IPB’s Motion fails both to successfully challenge Dr. Bokor’s expertise and the substance of his opinions. Its Motion should be denied.

ARMOND WILSON LLP

Dated: January 5, 2026

By: /Michelle E. Armond/
Michelle E. Armond (Reg. No. 53,954)
Douglas R. Wilson (Reg. No. 54,542)
Joseph Li (Reg. No. 74,998)
Monica Arnold (Reg. No. 77,262)
Yue Han (Reg. No. 80,950)
Attorneys for Western Digital Technologies, Inc

CERTIFICATE OF SERVICE

The undersigned certifies that pursuant to 37 C.F.R. § 42.6(e), a true copy of the foregoing **PETITIONER’S OPPOSITION TO MOTION TO EXCLUDE EVIDENCE** is being served electronically on January 5, 2026 to the following counsel for Patent Owner to the following email addresses:

Gerald B. Hrycyszyn
GHrycyszyn-PTAB@wolfgreenfield.com

Jie Xiang
JXiang-PTAB@wolfgreenfield.com

Thomas A. Franklin
TFranklin-PTAB@wolfgreenfield.com

Richard F. Giunta
RGiunta-PTAB@wolfgreenfield.com

Adam R. Wichman
AWichman-PTAB@wolfgreenfield.com

Scott A. McKeown
SMcKeown-PTAB@wolfgreenfield.com

Jason W. Balich
JBalich-PTAB@wolfgreenfield.com

ARMOND WILSON LLP

Dated: January 5, 2026

By: /Michelle E. Armond/

Michelle E. Armond (Reg. No. 53,954)

Douglas R. Wilson (Reg. No. 54,542)

Joseph Li (Reg. No. 74,998)

Monica Arnold (Reg. No. 77,262)

Yue Han (Reg. No. 80,950)

Attorneys for Western Digital Technologies, Inc.