

1 JULIE CARLSON

2 UNITED STATES PATENT AND TRADEMARK OFFICE

3 _____
4 BEFORE THE PATENT TRIAL AND APPEAL BOARD

5 _____
6 SAMSUNG ELECTRONICS CO., LTD., PETITIONER

7 V.

8 NETLIST, INC.,

9 PATENT OWNER

10 _____
11 CASE NO. IPR2022-00064 AND IPR2022-00062

12 U.S. PATENT NO. 10,474,595

13 _____
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16 DEPONENT: JULIE CARLSON

17
18 TAKEN: JULY 27, 2022

19
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21 REGISTERED DIPLOMATE REPORTER
22 CERTIFIED REALTIME REPORTER

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E X H I B I T S

NONE MARKED

JULIE CARLSON

THE DEPOSITION OF JULIE CARLSON, TAKEN PURSUANT
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*** **

APPEARANCES

VIA ZOOM VIDEOCONFERENCE

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1 JULIE CARLSON

2 JULIE CARLSON, AFTER BEING FIRST DULY
3 SWORN, WAS EXAMINED AND DEPOSED AS FOLLOWS:
4

5 MR. BUROKER: Good morning, Ms. Carlson.
6 My name is Brian Buroker. I'm here on behalf of Patent
7 Owner, Netlist, Inc.

8 For the record, Mr. Williams, do you want
9 to make an appearance as well?

10 MR. WILLIAMS: Sure. Eliot Williams of
11 Baker Botts for the petitioner.

12 MR. BUROKER: Okay.
13

14 EXAMINATION
15

16 BY MR. BUROKER:

17 Q. So, Ms. Carlson, have you ever been deposed
18 before?

19 A. No.

20 Q. Okay. So we'll give you a little bit of
21 guidance of how this will proceed so that we're on the
22 same page.

23 I will be asking questions initially, and then --
24 and Mr. Williams will have a chance to ask questions;
25 and then if I have any follow-up, I can ask another

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series of questions.

If you -- because of this format, we'll need to be careful not to talk over one another. So I will do my best to make it clear when my question is finished.

I'll wait for you to answer before I start asking a new question. And I just ask that you do the same: Wait for me to finish the question before you start to answer. And then that way we don't interrupt one another.

Do you understand that?

A. Yes.

Q. Okay.

If at any time you need to take a break, just let us know, and we're happy to do that. We just ask that you finish whatever answer that you're giving. So if we've asked you a question, answer that question, and then we can take a break.

A. Okay.

Q. Does that make sense?

A. Makes sense.

Q. Okay.

Is there any reason that you're not able to testify truthfully today, such as any medications you may be on or any other conditions?

1 JULIE CARLSON

2 A. No.

3 Q. Okay. Thank you.

4 Could you please state your full name for the
5 record?

6 A. Julie Drenning Carlson.

7 Q. And where are you currently testifying
8 from?

9 A. I'm testifying from my home in Naples,
10 Maine.

11 Q. Okay.

12 What is the address where you're located?

13 A. 28 Bayou Road, Naples, Maine 04055.

14 Q. And you understand that you're here in
15 connection with a patent dispute between Samsung and
16 Netlist; is that correct?

17 A. Yes.

18 Q. And you have offered a declaration in two
19 different proceedings involving those parties.

20 Do you understand that?

21 A. Yes.

22 Q. And do you have a copy of the declaration
23 that you offered in at least one of those proceedings?

24 A. I do.

25 Q. Which one do you have, just for the record?

1 JULIE CARLSON

2 What is the number of the inter partes review
3 number on that declaration?

4 A. IPR2022-0062.

5 Q. And you understand that the declaration in
6 the 0064 proceeding is the same; is that correct?

7 A. I do not have that one in front of me, so I
8 cannot say if they are the same or not.

9 Q. Okay.

10 Do you recall -- oh, sorry.

11 Do you recall offering more than one different
12 declaration?

13 A. I do not recall.

14 Q. Okay. So I will show you the 64.

15 Other than the cover page -- and maybe
16 Mr. Williams can confirm, just to -- the cover page is
17 different because it's a different proceeding, but the
18 actual declaration I believe is that same.

19 Do you remember that that's the case?

20 A. I do remember submitting it a couple of
21 times. I thought it was the same.

22 Q. Okay. That's fine.

23 And you also submitted a declaration in a
24 proceeding involving SK hynix and Netlist earlier in
25 2020.

1 JULIE CARLSON

2 Do you recall that?

3 A. I do recall doing a declaration that
4 involved SK hynix. Yes.

5 Q. Okay.

6 Who initially contacted you about providing a
7 declaration in the SK hynix matter?

8 A. All that information comes from our legal
9 department for me to do the research on.

10 Q. So do you recall who in your legal
11 department contacted you?

12 A. That would be John Kelly.

13 Q. Did you talk to the lawyers for SK hynix
14 directly at any point in time?

15 A. Not that I recall.

16 Q. Who drafted the text of the initial
17 declaration that you prepared in the SK hynix matter?

18 A. The actual text on the pages?

19 Q. Correct.

20 A. I would say it was a joint effort.

21 Q. Joint effort between you and who else?

22 A. What I -- what I received from our legal
23 department and what I edited and interpreted.

24 Q. And who from the legal department
25 collaborated with you on your declaration?

1 JULIE CARLSON

2 A. I apologize. We only have one person, and
3 that is John Kelly. So when I say "legal department,"
4 I mean John Kelly.

5 THE WITNESS: Do you -- can I have one
6 minute to shut my blinds?

7 MR. BUROKER: Sure.

8 THE WITNESS: Thank you. I'm so sorry.
9 I apologize. I was having a hard time
10 seeing.

11 BY MR. BUROKER:

12 Q. Do you know who contacted Mr. Kelly --

13 A. I do not know.

14 Q. Again, let's -- I'll start again.

15 A. I'm sorry.

16 Q. Do you know who contacted Mr. Kelly to
17 prepare the declaration in the SK hynix matter?

18 A. I do not know.

19 Q. Okay.

20 For this matter, in Samsung, who contacted you
21 about providing a declaration in this matter?

22 A. Mr. Kelly, as well as Ted Chandler. I'm
23 pretty sure that's his name.

24 Q. And is Mr. Chandler an attorney with Baker
25 Botts?

1 JULIE CARLSON

2 A. Yes.

3 Q. And how did they communicate with you: Was
4 it by email or telephone or both?

5 A. Via email.

6 Q. And did you communicate with Mr. Chandler
7 directly for this matter?

8 A. I did, via Mr. Kelly.

9 Q. Was it an email to Mr. Kelly and
10 Mr. Chandler both, or was it two -- let me -- I'll
11 rephrase my question.

12 When you say "via Mr. Kelly," what did you mean by
13 that?

14 A. Any time that Ted communicated to
15 Mr. Kelly, I was also copied on the email. So when I
16 responded, I replied to all.

17 Q. Okay.

18 And did you provide your authorization for Samsung
19 to reuse the declaration from the SK hynix matter in
20 the Samsung matter?

21 A. No. I do not have the authority to make
22 authorizations.

23 Q. Okay.

24 Who authorized Samsung to reuse the declaration
25 you provided in hynix in this Samsung matter?

1 JULIE CARLSON

2 A. I don't know if there was an authorization
3 for that. Mr. Kelly handles all legal matters.

4 Q. Are you being compensated for the time that
5 you spent preparing the declaration and offering
6 testimony here today?

7 A. No.

8 Q. So your declaration -- and do you -- I
9 think you said in the chat before we proceeded that you
10 have an electronic copy of the 64 declaration handy.
11 Is that correct?

12 A. I gave you -- the number was 62.

13 Q. Oh, I'm sorry. I did it wrong. So the '62
14 matter you have handy. Okay.

15 A. Yeah.

16 Q. If you could look at the -- not the cover
17 page, but the first page that has text on it, and
18 then --

19 A. Okay.

20 Q. -- in Paragraph 3, it says -- in the second
21 sentence, it says, "I was the manager of standards and
22 publications at JEDEC from February 1997 through June
23 2005."

24 Do you see that?

25 A. Yes.

JULIE CARLSON

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Q. And that's correct; is that right?

A. That's correct. Yes.

Q. And then it says, "Since June 2005, I have continued to work for JEDEC as a consultant, where my responsibilities include the maintenance and publication of JEDEC documents and standards."

Do you see that?

A. Yes.

Q. Why did your relationship with JEDEC change to a consulting relationship in 2005?

A. Because I moved from Virginia to Maine.

Q. Is your -- are you a full time consultant for JEDEC?

A. Yes. And JEDEC only.

Q. And they -- they pay you based on the number of hours that you work; is that correct?

A. I am contracted with a monthly salary.

Q. And when you say that your responsibilities include the maintenance and publication of JEDEC documents and standards, what types of JEDEC documents and standards are you responsible for maintaining?

A. All documents that are approved for publication.

Q. So your area of responsibility does not

1 JULIE CARLSON

2 include draft standards; is that correct?

3 MR. WILLIAMS: Objection to form.

4 Sorry, Julie, you can answer.

5 Maybe you should cover that, Brian.

6 MR. BUROKER: Yeah.

7 BY MR. BUROKER:

8 Q. So when Mr. Williams objects or if he's
9 asking questions and I object, you still have to answer
10 the question to the best of your ability to answer the
11 question, unless somebody instructs you not to answer
12 based on attorney-client privilege.

13 So in this case I asked a question, Mr. Williams
14 posed an objection; but to the extent you understand
15 the question, you still have to answer it.

16 So let me see if I can remember my question.

17 Oh. So in your role as a consultant for JEDEC,
18 you are not involved in the maintenance and publication
19 of draft standard materials; is that correct?

20 MR. WILLIAMS: Same objection.

21 THE WITNESS: No.

22 BY MR. BUROKER:

23 Q. Well, let me ask it -- you are not involved
24 in draft standards; is that correct?

25 A. I receive the documents in draft form to

1 JULIE CARLSON

2 prepare them for publication.

3 Your question is not clear based on our process.

4 Q. So a document that has not actually been
5 voted as being approved by JEDEC, are you involved in
6 the maintenance or distribution of those -- those kinds
7 of documents that are not finally approved documents?

8 A. Thank you.

9 No, I am not.

10 Q. So are you involved in maintaining and
11 overseeing the voting machine process at JEDEC?

12 A. No. I am not.

13 Q. When -- the next sentence down in your
14 declaration says you're "familiar with JEDEC's
15 historical recordkeeping and publication practices
16 since at least 1992, based on my review of JEDEC's
17 business records since that time and my regular
18 discussions with JEDEC employees and members."

19 Do you see that sentence?

20 A. Yes.

21 Q. So you didn't start until 1997; is that
22 correct?

23 A. Correct.

24 Q. And so in this sentence are you saying that
25 you have reviewed the practices going back to 1992?

1 JULIE CARLSON

2 A. Yes.

3 Q. Okay.

4 But you weren't there in 1992?

5 A. I was not.

6 Q. So in 19 -- excuse me.

7 In the 2009/2010 timeframe, you were, at that
8 point, a consultant for JEDEC; is that right?

9 A. Correct.

10 Q. And you were not involved in overseeing the
11 voting machine processes in place in 2009/2010,
12 correct?

13 A. Correct.

14 Q. So you didn't -- you were not involved in
15 the balloting process in the 2009 to 2010 timeframe; is
16 that right?

17 A. I was --

18 MR. WILLIAMS: Objection to form.

19 THE WITNESS: I was involved in the
20 balloting process.

21 BY MR. BUROKER:

22 Q. In what way were you involved in the
23 balloting process?

24 A. I'm a representative for another committee.

25 Q. What other committee are you a

1 JULIE CARLSON

2 representative for?

3 A. It's JC-11.

4 Q. So were you involved in the balloting
5 process for JC-40 during the 2009/2010 timeframe?

6 A. No. I was not.

7 Q. Your declaration attaches a number of
8 exhibits to it, and I want to start with Exhibit A.

9 Where did you get the document that is attached as
10 Exhibit A to your declaration?

11 A. JEDEC maintains all the documents on its
12 server.

13 Q. And did you personally go to the server and
14 retrieve and download Exhibit A?

15 A. Yes.

16 Q. And were you asked to do that by Mr. Kelly?

17 A. I was.

18 Q. Do you have administrative-level access to
19 the documents?

20 A. Yes. I do.

21 Q. So you have -- you as a JEDEC consultant
22 have access to all documents in JEDEC; is that correct?

23 A. That's correct.

24 Q. But Exhibit A, because it is related to --
25 according to the document -- JC-40.4, that document

1 JULIE CARLSON

2 would not be available to all JEDEC members unless they
3 were a member of the JC-40 committee; is that correct?

4 A. That's correct.

5 Q. Only JC-40 members would have access to
6 that document on JEDEC's servers; is that right?

7 A. That's correct.

8 Q. At some point in time during your tenure
9 with JEDEC, has it changed the system it uses to
10 maintain its documents?

11 A. No.

12 Q. Did Mr. -- so Exhibit A, did Mr. Kelly
13 provide you a list of which materials to retrieve and
14 download?

15 A. There was a list requested. Yes.

16 Q. Do you know who provided him with that
17 list?

18 A. I do not.

19 Q. When you retrieved Exhibit A, was that
20 through a browser-accessible system?

21 Strike that. Let me start over.

22 What computer system did you use to retrieve what
23 has now been provided as Exhibit A?

24 A. As a JEDEC consultant, I accessed the
25 system through VPN.

1 JULIE CARLSON

2 Q. And which actual application did you use;
3 was it a web browser or some other application on your
4 computer?

5 A. Another application on my computer.

6 Q. And what is the name of that application?

7 A. I would think it's VPN.

8 Q. So -- but when you're in your computer,
9 were you using Internet Explorer, or what other
10 software application would you use to get to the actual
11 document?

12 A. I'll tell you.

13 It's called Cisco.

14 Q. Do you know what documents JEDEC members
15 use to access the documents on the JEDEC server?

16 A. No. I do not. They cannot access
17 documents, only via our website.

18 Q. So you used a different tool to access
19 Exhibit A than what a JEDEC member would have been
20 required to use in the 2009/2010 timeframe; is that
21 right?

22 A. Correct.

23 Q. So then Exhibit B, which is on page 21 of
24 the document, did you also retrieve Exhibit B from the
25 JEDEC system?

JULIE CARLSON

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A. Yes.

Q. There's a little icon that is at the top and sort of three-quarters of the way that says "Voting Machine," and it's got a little graphic.

Do you know what that means?

A. That's the symbol to get back to the voting machine. That's our system where members access ballots.

Q. Okay.

In your declaration, on -- in Paragraph 7, you indicate that Exhibit A -- which we just looked at -- is a proposal to the JC-40-4 committee for ballot approval in the first sentence.

Do you see that?

A. Yes.

Q. And you refer to it as Item Number 142.35, correct?

A. Correct.

Q. And then you say Exhibit B is a committee letter ballot, JC-40.4-03-320 [sic].

Do you see that?

A. Yes.

Q. Okay.

Then it says -- you say that -- hold on. My Siri

1 JULIE CARLSON

2 for some reason is on. Let me start again.

3 You say that Exhibit B was distributed
4 November 11, 2009. Is that based upon the contents of
5 this document, or is that based on your personal
6 knowledge?

7 A. Based on the contents of this document.

8 Q. So you personally don't know whether
9 committee letter ballot JC-40.4-09-320 was actually
10 distributed on November -- November 11th, 2009?

11 A. I do know that that is the date. It's
12 automatically filled in by our voting machine.

13 Q. Okay.

14 And isn't it true that the way in which the
15 materials are, quote/unquote, distributed, is only via
16 the website?

17 MR. WILLIAMS: Objection to form.

18 THE WITNESS: It is via the website. Yes.

19 BY MR. BUROKER:

20 Q. There is no email of the ballot to the
21 members; is that correct?

22 A. There is an email. Yes.

23 Q. But the email just directs the members to
24 go to the website, it doesn't actually attach the
25 ballot; is that correct?

1 JULIE CARLSON

2 A. Correct.

3 Q. So if a member wants to go see a ballot,
4 he -- or an individual from the member would need to go
5 to the website to see what you see here as Exhibit B --

6 A. Correct.

7 Q. -- correct?

8 A. Correct.

9 Q. And then Exhibit A, in your declaration you
10 say that it would also have been distributed in the
11 link labeled "Download NB09320-.PDF."

12 Do you see that?

13 A. Yes.

14 Q. There's nothing in Exhibit A that says it
15 is the document one would get if you clicked on the
16 link in Exhibit B, is there?

17 A. Not that I see.

18 Q. In the Exhibit B, the electronic version
19 that we have, the underlying portion is not an active
20 link, correct; in other words, you can't click on that
21 underlying portion and get any document, right?

22 A. Not from this declaration; but from the
23 voting machine, yes.

24 Q. Did you do that to determine whether if you
25 clicked on the link that says "Attachment: Download

1 JULIE CARLSON

2 NB09320-.PDF," if you would get the document that is
3 attached as Exhibit A?

4 A. Yes.

5 Q. You did that in 2020 when you were
6 preparing your declaration?

7 A. Correct.

8 Q. Okay.

9 Do you know if that link works today?

10 A. According to our process, it -- yes, it
11 should.

12 Q. But since you signed your declaration in
13 2020, you have not double-checked to see that that link
14 is still operative?

15 A. No.

16 Q. And do you have any way within the system
17 to determine whether that link would have been
18 operative back in the 2009/2010 timeframe when this
19 letter ballot was being voted on?

20 A. Yes, at the time.

21 Q. There's no way today to go back to
22 determine what would have been available to members in
23 2009/2010, though, is there?

24 A. Yes.

25 Q. And what are you thinking of?

1 JULIE CARLSON

2 A. If the ballot is still available on the
3 voting machine and you click that link, it directly
4 goes to the file. They are maintained on our system.

5 Q. Okay.

6 So you printed out Exhibit B. Did you also print
7 out Exhibit C?

8 A. When you say "print out," as in a paper --

9 Q. Well, let me start -- when you generate --
10 to generate the exhibit you download them as a PDF, I
11 assume. Is that correct?

12 A. That's correct.

13 Q. Okay.

14 And did you generate Exhibit C based upon
15 Mr. Kelly's request?

16 A. Yes.

17 Q. And I think you refer in your declaration
18 to the relevant -- the relevant portion being on
19 page 21, but I think that corresponds to page 45 of the
20 document too, which would be the letter ballot for
21 143.25.

22 I'm sorry. It's not -- it's page 43.

23 A. Exhibit C?

24 Q. Yeah. Page 43 of the document, but, you
25 know, part of Exhibit C.

1 JULIE CARLSON

2 Do you see that?

3 A. Yes.

4 Q. On the top, it says "Committee Letter
5 Ballot JC-40.4-09-320 Item 142.35."

6 Do you see that? Do you see that?

7 A. On the top of page 43?

8 Q. Yes.

9 A. No.

10 Q. So I'm looking at the page numbers on the
11 bottom right that say "Exhibit 1050, p. 43."

12 Is that where you're looking?

13 A. Okay. I see now. My apologies.

14 Q. Okay. I just wanted to make -- yeah.

15 A. Yeah.

16 Q. There's a lot of page numbers on these
17 documents, making sure you're on the same page I am.

18 A. I was following the PDF page number. My
19 apologies.

20 Q. Oh, okay. Yeah. So we're looking at the
21 "Exhibit 1050, p. 43," that page.

22 And I think in your declaration you said that this
23 records the votes for 20 companies that voted on the
24 letter ballot.

25 Do you recall that?

1 JULIE CARLSON

2 A. Yes.

3 Q. And so there -- it also records that there
4 were 15 companies that voted yes; is that right?

5 A. Yes.

6 Q. And five companies that abstained, right?

7 A. Yes.

8 Q. And then one that indicated P, which means
9 patent; is that right?

10 A. No -- oh, yes.

11 Q. And that was Netlist, right?

12 A. Correct.

13 Q. Do you know what -- under the column for
14 Intel or the row for Intel, there's -- under C, there's
15 an X; and then PC, that says N/A.

16 Do you know what that means?

17 A. Yes.

18 Q. What does that mean?

19 A. C stands for comment. And P stands for
20 postcard, which means whether a response was made to
21 the comment.

22 Q. Okay.

23 And who would make a response to a comment?

24 A. The sponsor of the ballot.

25 Q. And would it actually be a physical

1 JULIE CARLSON

2 postcard, or is that a carryover from an old
3 terminology?

4 A. A carryover.

5 Q. So how would one respond to a comment;
6 would that be on the system somewhere or by email, or
7 how would that be done?

8 A. In most cases it should be on the system,
9 but in some cases they have been via email.

10 Q. Okay.

11 And just to be clear, the Exhibits A through J,
12 you were not involved in creating those documents, you
13 were involved in downloading them for exhibits to your
14 declaration; is that right?

15 A. It's correct for Exhibits A through H.

16 Q. And why is it not correct for I and J?

17 A. Because those are manuals of operation and
18 procedure, and as the staff person that's involved, I
19 do all the editing and help write the document.

20 Q. Okay.

21 So you were -- you were involved in helping to
22 create the manuals, which are two different versions
23 typed as I and J, correct?

24 A. Yes. Yeah. Correct.

25 Q. And going back to Paragraph 5 of your

1 JULIE CARLSON

2 declaration, I just want to understand part of -- of
3 this. It says, "JEDEC membership is open to any
4 company, organization, or one of its related entities,
5 that manufacturers electronic equipment or
6 electronic-related products or related services."

7 Do you see that?

8 A. Yes.

9 Q. Was that true in 2009/2010 as well?

10 A. Yes, I believe it was.

11 Q. So individuals are not permitted to join
12 JEDEC; is that right?

13 A. That I cannot answer. You would have to
14 refer to Mr. Kelly.

15 Q. Do you know if university professors can
16 join JEDEC?

17 A. No, I do not know. I believe -- no.

18 Q. So the next sentence says, "Anyone
19 interested can join JEDEC online at JEDEC.org."

20 You're referring there to anyone who is an
21 eligible member, correct?

22 A. Correct.

23 Q. So not just anyone can join, you have to be
24 in a company that meets the requirements in the first
25 sentence of Paragraph 5, right?

1 JULIE CARLSON

2 A. Correct.

3 Q. And then to gain access to individual
4 documents of a committee or subcommittee, the company
5 then also has to join that committee or subcommittee,
6 correct?

7 A. Correct.

8 Q. Do you recall approximately how much it
9 cost to join JEDEC back in 2009/2010?

10 A. No. That's our membership department.

11 Q. But there was a fee associated with
12 joining, correct?

13 A. Yes.

14 Q. And only companies that had paid the fees
15 and were members would then have access to the
16 committee documents, right?

17 A. Correct.

18 Q. So on Exhibit B to your declaration, the
19 first page of Exhibit B -- so Exhibit B there's a cover
20 page, and then the next page is the -- is the one I'm
21 referring to, and it's also page 21 of the -- of the
22 material, so it says "Ex. 1050, p. 21" at the bottom
23 right.

24 Do you see that?

25 A. Yes.

1 JULIE CARLSON

2 Q. So above there there's a printout date of
3 6/3/2020 at 10:21 a.m.

4 Do you see that?

5 So on the bottom right, where it says "Exhibit
6 1050, p. 21," and then above that it says "Samsung
7 Electronics, LTD." --

8 A. I do see that.

9 Q. Yeah.

10 So do you see that date and time?

11 A. Yes.

12 Q. Is that the date and time that you printed
13 or downloaded a copy of Exhibit B?

14 A. Yes.

15 Q. Did you -- is that about the date and time
16 that you downloaded Exhibits A through H as well?

17 A. I would say yes.

18 Q. And also --

19 A. But it's possible that I was working -- it
20 may have taken me more than a week to do it.

21 Q. So your declaration was signed on June 3rd,
22 2020, correct?

23 A. Correct.

24 Q. So by June 3rd, 2020, you had downloaded
25 all of Exhibits A through J; is that fair?

1 JULIE CARLSON

2 A. That's fair.

3 Q. Give me a minute here.

4 MR. BUROKER: Okay. I don't think I have
5 any other questions for you, Ms. Carlson. I really
6 appreciate it.

7 I'll pass the witness to Mr. Williams.

8 MR. WILLIAMS: I need to look over my
9 notes, but I first need to take a bio break, so can we
10 take five minutes here?

11 MR. BUROKER: Sure.

12 MR. WILLIAMS: Off the record.

13 (RECESS TAKEN.)

14
15 EXAMINATION

16
17 BY MR. WILLIAMS:

18 Q. Ms. Carlson, you mentioned JC-11 in one of
19 your answers.

20 Can you explain what that is?

21 A. That is our committee that does
22 microelectronic standardizations for packages.

23 Q. And what were your responsibilities with
24 respect to JC-11?

25 A. I'm the secretary for that committee.

1 JULIE CARLSON

2 Q. And does that mean you attend committee
3 meetings?

4 A. Yes. It does.

5 Q. Okay.

6 Have you had those responsibilities since you
7 first joined JEDEC as an employee?

8 MR. BUROKER: Objection, form.

9 THE WITNESS: I originally had JC-10
10 committee, when I first started with JEDEC. JC-11
11 committee did not come until two years after that time.
12 BY MR. WILLIAMS:

13 Q. Are you still -- are you still acting as
14 the secretary for JC-11?

15 A. Yes. I am.

16 Q. How often do you attend meetings for that
17 committee?

18 A. In 2020 -- in 2022, it's four times a year.

19 Q. You -- one of your answers you mentioned
20 that only committee members would have access to the
21 committee documents on the JEDEC website; is that
22 right?

23 A. That is correct.

24 Q. How would a JEDEC member learn of the
25 existence of a committee?

1 JULIE CARLSON

2 MR. BUROKER: Objection, scope and
3 foundation.

4 THE WITNESS: All of the JEDEC committees
5 are listed on our website.

6 BY MR. WILLIAMS:

7 Q. And where they're listed, is there some
8 explanation given of their subject matter?

9 A. Yes.

10 Q. And what about subcommittees; how would a
11 JEDEC member learn of the existence of the JEDEC
12 subcommittees?

13 MR. BUROKER: Same objection.

14 THE WITNESS: The same way.

15 BY MR. WILLIAMS:

16 Q. And are there -- is there a listing of the
17 subject matter of the JEDEC subcommittees on the
18 website available to all JEDEC members?

19 A. That information is public.

20 Q. When you say "public," how is it made
21 public?

22 A. Via the website.

23 Q. Was that true in 2009 as well?

24 MR. BUROKER: Objection, form and scope.

25 THE WITNESS: That I cannot answer; but our

JULIE CARLSON

committee scope manual has been made public since our website has been created.

BY MR. WILLIAMS:

Q. Let me ask you about your role as a secretary for JC-11.

Were you provided with training on your responsibilities for that role?

A. Yes.

MR. BUROKER: Objection, scope.

Just pause for a second --

THE WITNESS: Yes.

MR. BUROKER: -- so I can get my objection.

Thank you, Ms. Carlson.

Scope.

THE WITNESS: Yes.

BY MR. WILLIAMS:

Q. Can you just briefly explain to us how you were trained for that --

MR. BUROKER: Same objection.

BY MR. WILLIAMS:

Q. -- for those responsibilities?

MR. BUROKER: Oh, sorry.

Same objection.

THE WITNESS: I was trained by JEDEC staff.

1 JULIE CARLSON

2 BY MR. WILLIAMS:

3 Q. And did your training involve reviewing the
4 manuals that were attached as Exhibits J and I to your
5 declaration?

6 A. Yes.

7 MR. WILLIAMS: Okay. I have no further
8 questions.

9 MR. BUROKER: I don't have any re-cross
10 either, so I think we thank you very much for your
11 time.

12 (CONCLUDED AT 9:44 A.M.)
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JULIE CARLSON

REPORTER'S CERTIFICATE

I, DANNIELLE COPELAND, RDR, CRR, DO HEREBY CERTIFY THAT THE FOREGOING DEPOSITION OF JULIE CARLSON WAS TAKEN BEFORE ME AT THE TIME AND PLACE AND FOR THE PURPOSE IN THE CAPTION STATED; THAT THE WITNESS WAS FIRST DULY SWORN TO TELL THE TRUTH, THE WHOLE TRUTH, AND NOTHING BUT THE TRUTH; THAT THE DEPOSITION WAS TAKEN BEFORE ME STENOGRAPHICALLY AND AFTERWARDS TRANSCRIBED UNDER MY DIRECTION; THAT THE FOREGOING IS A FULL, TRUE, AND CORRECT TRANSCRIPT OF THE SAID DEPOSITION SO GIVEN; THAT THERE WAS NO REQUEST THAT THE WITNESS READ AND SIGN THE TRANSCRIPT; THAT THE APPEARANCES WERE AS STATED IN THE CAPTION.

I FURTHER CERTIFY THAT I AM NEITHER OF COUNSEL NOR OF KIN TO ANY OF THE PARTIES TO THIS ACTION, AND AM IN NO WAY INTERESTED IN THE OUTCOME OF SAID ACTION.

WITNESS MY SIGNATURE ON AUGUST 3, 2022. MY COMMISSION EXPIRES SEPTEMBER 28, 2023.


DANNIELLE COPELAND, RDR, CRR

J U R A T

I, _____, do hereby certify under penalty of perjury that I have read the foregoing transcript of my deposition taken on _____; that I have made such corrections as appear noted herein in ink, initialed by me; that my testimony as contained herein, as corrected, is true and correct.

DATED this ____ day of _____, 2022,
at _____, _____.

SIGNATURE OF WITNESS

ERRATA SHEET

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2 Case Name:

3 Deposition Date:

4 Deponent:

5 Pg. No. Now Reads Should Read Reason

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21 Signature of Deponent

22 SUBSCRIBED AND SWORN BEFORE ME

23 THIS ____ DAY OF _____, 2022.

24 _____

25 (Notary Public) MY COMMISSION EXPIRES: _____