

I, Hiroshi Iwatsubo, declare under penalty of perjury as follows:

1. I am currently the Representative Director and Executive Deputy President of Murata Manufacturing Co., Ltd. (“MMC”); in April 2007, I served as General Manager of the Corporate Planning Department for MMC. I make this declaration based upon my personal knowledge, information, and belief.

2. I have read George White’s declaration (Ex-2001, IPR2025-00383 & 00384). I understand he has made statements regarding meetings between MMC and Jacket Micro Devices (“JMD”) including a meeting that took place in April 2007 between JMD and MMC, referred to here as “the April 2007 meeting”.

3. In his declaration, George White states that JMD presented the then-pending U.S. Patent Application 2005/0248418 (“’418 Patent Publication”) during “the April 2007 meeting”, and that MMC expressed an interest in manufacturing and selling the technology disclosed therein as part of a proposed commercial arrangement. My recollection differs from George White’s account.

4. First, my recollection is that the purpose of “the April 2007 meeting”, and the communication between MMC and JMD during the 2006-2008 timeframe generally, was to consider and evaluate JMD’s substrate technology. It is my recollection that the question MMC was evaluating was whether JMD could demonstrate the specific substrate technology it purported to be offering.

5. Second, I do not recall discussing, reviewing, or receiving any document from George White or his colleagues labeled as the ’418 Patent Publication during the April 2007 meeting. I understand now from George White’s declaration that a title associated with the ’418 Patent Publication was specified in one line of PowerPoint that George White alleges he co-presented in the April, 2007 meeting. I do not recall any discussion of this title or any associated publication.

6. Third, I am certain that I would not have expressed a specific request to manufacture or sell technology disclosed in the '418 Patent Publication at “the April 2007 meeting” or otherwise. In my experience, deciding to enter a new commercial endeavor is not something I would or could represent unilaterally on behalf of MMC at a single meeting. This is also true of other MMC representatives involved in communications with JMD.

7. This certainty is based in large part on MMC’s standard “Ringi” decision-making process. In many Japanese companies, including MMC, managers must build consensus among numerous stakeholders before reaching any final decision. This can be a lengthy process, often taking several weeks or even months. In April 2007, if I wished to commit MMC to any commercial arrangement with JMD (particularly one involving patented technology), I would have needed to initiate the Ringi process within our organization. This would require me to prepare internal proposals, distribute them to relevant departments for review, gather feedback, and secure the internal approvals necessary to undertake a formal collaboration. In April 2007, with my role in MMC at that time, I would not have had personal authority to commit MMC—especially with respect to manufacturing or selling patent-protected methods or technologies—without completing that essential corporate procedure. I do not recall any Ringi process relating to any alleged Murata interest in manufacturing and selling the technology disclosed in '418 Patent Publication as part of a proposed commercial arrangement being initiated or completed.

8. Accordingly, at “the April 2007 meeting”, I could not and did not express that MMC wanted to manufacture or sell the technology of the '418 Patent Publication. I respectfully disagree with George White’s statement on that point.

9. I also understand that JMD provided samples of its technology to MMC for evaluation. MMC evaluated these samples in 2007. In December of 2007, MMC's engineering staff produced an evaluation report regarding these samples. A copy of this evaluation report titled "Evaluation Report To JMD" is provided as EX1044. It is my belief and understanding that a final copy of this report was presented to JMD in approximately May 2008. The "Evaluation Report To JMD" illustrates problems with the sample JMD substrate technology including issues with delamination, voids, and manufacturing.

10. As discussed in the report, MMC determined that the substrate technology being offered by JMD was not useable by MMC, and this was conveyed to JMD. This is consistent with my experience, as conveying evaluation results would be standard practice when MMC evaluates possible technologies. It was my understanding that if JMD, George White, or his colleagues were to provide a substrate technology that did not exhibit the issues that were identified in the "Evaluation Report to JMD," they would contact MMC again.

11. To my knowledge, after 2008 and up until August 22, 2024, none of JMD, George White, the other named inventors of U.S. Patent No. 7,489,914 Patent, or Georgia Tech Research Corporation (GTRC) contacted MMC to discuss U.S. Patent No. 7,489,914 Patent or any JMD specific substrate technology.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 11 day of July, 2025.



Signature:

Name: Mr. Hiroshi Iwatsubo

Title: Representative Director and Executive Deputy President, MMC
Manufacturing Co., Ltd.