

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

RADIAN MEMORY SYSTEMS LLC,

Plaintiff,

v.

SAMSUNG ELECTRONICS CO., LTD.,
SAMSUNG ELECTRONICS AMERICA, INC.,

Defendants.

Case No. 2:24-cv-01073-JRG

JURY TRIAL DEMANDED

DECLARATION OF RICH DEGLIN

I, Rich Deglin, declare as follows:

1. I am an employee of Samsung Semiconductor, Inc. (“Samsung”) and have been since 2012. I am currently a Principal Engineer at Samsung.

2. I have personal knowledge of the facts recited in this declaration and all statements are correct to the best of my knowledge, information, and belief. If called to testify, I could and would testify as to the truth of the statements herein.

3. “T10 Working Drafts”, T10, <http://www.t10.org/drafts.htm> (last visited Jul. 17, 2025) (“2025 T10 Working Drafts Webpage”) lists all current working drafts and when those working drafts were published. The 2025 T10 Working Drafts Webpage is attached to this declaration as EX1101.

4. On the 2025 T10 Working Drafts Webpage, certain documents are listed as “Only T10 members are permitted to access this document.” Other documents do not have this limitation.

5. For instance, the 2025 T10 Working Drafts Webpage lists a working draft for “SCSI Block Commands – 5 (SBC-5)” “Rev[ision]: 08” (“SBC-5”), further reciting publication

on “Date: 2024/09/11”. The 2025 T10 Working Drafts Webpage also lists a hyperlink to download SBC labeled as “PDF File: sbc5r08.pdf”. There is no “members only” limitation on this document, and clicking on the URL redirects to a website that allows the file to be downloaded either with “Guest Access” or “T10 Member Access.” EX1102. The guest access form for SBC-5—“File Access Monitor”, T10, <https://www.t10.org/cgi-bin/ac.pl?t=f&f=sbc5r08.pdf> (last visited Jul. 17, 2025)—is attached to this declaration as EX1102. I personally verified that entering my personal information into the Guest Access fields allowed me to download sbc5r08.pdf.

6. The “T10 Working Drafts” website appears to have been archived regularly by archive.org, including in July 2014. “T10 Working Drafts”, T10 (archived Jul. 15, 2014), <https://web.archive.org/web/20140715124727/http://www.t10.org/drafts.htm> (last visited Jul. 17, 2025) (“2014 T10 Working Drafts Webpage”). The 2014 T10 Working Drafts Webpage is attached to this declaration as EX1103. The 2014 T10 Working Drafts Webpage appears to list all working drafts as of July 15, 2014 and when those working drafts were published.

7. The 2014 T10 Working Drafts Webpage explains that “Once a working draft is sent to INCITS for final approval, the link will be deactivated for guest access.” It also explains that “[i]n most cases, the link to the final T10 committee working draft revision for a project is retained here for T10 Member access only.” This indicates that until a standard is “sent to INCITS for final approval,” it is available for guest access.

8. The 2014 T10 Working Drafts Webpage lists a working draft for “SCSI Primary Commands – 4 (SPC-4)” “Rev[ision]: 37” (“SPC-4”), further reciting publication on “Date: 2014/05/17”. The 2014 T10 Working Drafts Webpage also lists a hyperlink to download SPC-4 labeled as “PDF File: spc4r37.pdf”. The document is not listed as allowing access for “members only.” The link redirects to the same guest access form as the SBC-5 form on the 2025 T10 Working Drafts Webpage. *Compare* Ex. EX1104 *with* Ex. EX1102. The guest access form for SPC-4—“File Access Monitor”, T10 (archived May 19, 2014), <https://web.archive.org/web/20140519064154/http://www.t10.org/cgi-bin/ac.pl?t=f&f=spc4r37.pdf> (last visited Jul. 17, 2025)—is attached to this declaration as

EX1104. Because the website is archived, I was unable to download spc4r37.pdf using the guest access form.

9. The 2014 T10 Working Drafts Webpage lists a working draft for “SCSI Block Commands – 4 (SBC-4)” “Rev[ision]: 02” (“SBC-4”), further reciting publication on “Date: 2014/05/20”. The 2014 T10 Working Drafts Webpage also lists a hyperlink to download SBC-4 labeled as “PDF File: sbc4r02.pdf”. The document is not listed as allowing access for “members only.” The link redirects to the same guest access form as the SBC-5 form on the 2025 T10 Working Drafts Webpage. *Compare* Ex. EX1105 *with* Ex. EX1102. The guest access form for SBC-4—“File Access Monitor”, T10 (archived April 16, 2015), <https://web.archive.org/web/20150416184431/http://www.t10.org/cgi-bin/ac.pl?t=f&f=sbc4r02.pdf> (last visited Jul. 17, 2025)—is attached to this declaration as EX1105. Because the website is archived, I was unable to download sbc4r02.pdf using the guest access form.

10. The 2014 T10 Working Drafts Webpage lists a working draft for “Zoned Block Commands (ZBC)” “Rev[ision]: 01a” (“ZBC”), further reciting publication on “Date: 2014/05/15”. The 2014 T10 Working Drafts Webpage also lists a hyperlink to download ZBC labeled as “PDF File: zbc-r01a.pdf”. The document is not listed as allowing access for “members only.” The link redirects to the same guest access form as the SBC-5 form on the 2025 T10 Working Drafts Webpage. *Compare* Ex. EX1106 *with* Ex. EX1102. The guest access form for SBC-4—“File Access Monitor”, T10 (archived May 19, 2014), <https://web.archive.org/web/20140519063435/http://www.t10.org/cgi-bin/ac.pl?t=f&f=zbc-r01a.pdf> (last visited Jul. 17, 2025)—is attached to this declaration as EX1106. Because the website is archived, I was unable to download zbc-r01a.pdf using the guest access form.

11. I have not used guest access to download SBC-4, SPC-4, or ZBC. However, I have no reason to believe that the process for accessing documents through guest access has ever changed. In fact, the form is exactly the same for documents accessed using the 2014 T10 Working Drafts Webpage and the 2025 T10 Working Drafts Webpage. *See* EX1102; EX1104; EX1105;

EX1106.

12. T10 also sent weekly emails listing new publications. In 2014, I received and acted on these weekly emails. I have attached to this declaration, as EX1107, a May 17, 2014 email from “owner-t10@t10.org on behalf of T10 Document Administrator <lohmeyer@t10.org>.” This email lists SPC-4 (spc4r37.pdf) and ZBC (zbc-r01a.pdf) as available for download. EX1107. I have attached to this declaration, as EX1108, a May 24, 2014 email from “owner-t10@t10.org on behalf of T10 Document Administrator <lohmeyer@t10.org>.” This email lists SBC-4 (sbc4r02.pdf) as available for download. EX1108.

13. My practice at the time was to download all new working drafts when I received these emails. I personally downloaded SBC-4, SPC-4, and ZBC at the time I received these emails, and have kept those copies in my personal files. EX1006; EX1007; EX1008.

14. Attached as EX1007 to this declaration is the copy of sbc4r02.pdf that I downloaded in 2014. According to the “date modified” metadata for this file, I downloaded sbc4r02.pdf on May 25, 2014, just a few days after the May 20, 2014 publication date listed on the 2014 T10 Working Drafts Webpage. The file is listed as being 2885166 bytes in size, which is the same size listed on the 2014 T10 Working Drafts Webpage for sbc4r02.pdf.

15. Attached as EX1008 to this declaration is the copy of spc4r37.pdf that I downloaded in 2014. According to the “date modified” metadata for this file, I downloaded spc4r37.pdf on May 18, 2014, just one day after the May 17, 2014 publication date listed on the 2014 T10 Working Drafts Webpage. The file is listed as being 4269360 bytes in size, which is the same size listed on the 2014 T10 Working Drafts Webpage for spc4r37.pdf.

16. Attached as EX1006 to this declaration is the copy of zbc-r01a.pdf that I downloaded in 2014. According to the “date modified” metadata for this file, I downloaded zbc-r01a.pdf on May 18, 2014, just a few days after the May 15, 2014 publication date listed on the 2014 T10 Working Drafts Webpage. The file is listed as being 233808 bytes in size, which is the same size listed on the 2014 T10 Working Drafts Webpage for zbc-r01a.pdf.

17. Attached as EX1109 to this declaration is a copy of zbc-r01.pdf that I downloaded

in 2014. This file is an earlier version of zbc-r01a. According to the “date modified” metadata for this file, I downloaded zbc-r01.pdf on May 11, 2014, just 1 day after the May 10, 2014 publication date listed on the 2014 T10 Working Drafts Webpage. The file is listed as being 232054 bytes in size, which is the same size listed on the 2014 T10 Working Drafts Webpage for zbc-r01.pdf.

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

Executed on August 1, 2025, at San Jose, California.

/s/ Richard N. Deglin