UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

MICRON TECHNOLOGY, INC., and MICRON SEMICONDUCTOR PRODUCTS, INC.,

Petitioners,

v.

PALISADE TECHNOLOGIES, LLP,

Patent Owner.

Case IPR2025-01559

Patent No. 9,524,974

PATENT OWNER'S REQUEST FOR DISCRETIONARY DENIAL OF INSTITUTION

EXHIBIT 2005: DECLARATION OF T. WILLIAM KENNEDY JR.

I, T. William Kennedy Jr., hereby declare as follows:

1. I am an attorney with the law firm of Nelson Bumgardner Conroy, P.C. and represent Palisade Technologies, LLP, ("Palisade") in the currently pending patent litigation between Patent Owner Palisade and Petitioners Micron Technology, Inc. and Micron Semiconductor Products, Inc. (collectively, "Petitioner" or "Micron") in the United States District for the Western District of Texas, Case No. 7:24-cv-00262 (the "Litigation").

2. In the Litigation, Palisade alleges infringement of United States Patent Nos. 8,148,962 ("'962 patent"); 8,996,838 ("'838 patent"); 8,327,051 ("'051 patent"); 9,281,314 ("'314 patent"); and 9,524,974 ("'974 patent") (collectively, the "Asserted Patents").

3. Discovery opened in the Litigation on October 2, 2025, and substantial discovery has already taken place.

4. Micron and Patent Owner each served initial disclosures on October 2, 2025.

5. Micron and Patent Owner collectively served 109 requests for production on October 2, 2025, and both parties served objections and responses to those requests on November 3, 2025.

6. Micron served thirteen interrogatories on October 2, 2025, and Patent Owner provided its responses on November 3, 2025. Patent Owner served seventeen interrogatories on October 2, 2025, and Micron provided its responses on November 3, 2025.

7. In addition, the parties served and answered nine venue interrogatories and nineteen requests for production on venue in May and June 2025. And Micron presented four 30(b)(6) witnesses related to its venue motion in June and July 2025.

8. Micron issued four third party subpoenas on November 5, 2025. And the parties have produced over 21,639 pages of documents related to venue, prior art, and technical documentation.

9. Patent Owner also has conducted substantial review of Micron's source code, design files and related information, having sent two subject-matter experts to review materials Micron made available on a secure terminal at its headquarters on two different occasions.

Dated: December 22, 2025

Bill Kennedy

T. William Kennedy Jr.