

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAMSUNG ELECTRONICS CO., LTD.,

Petitioner,

v.

NETLIST, INC.,

Patent Owner

PGR2025-00071

Patent 12,308,087

**PETITIONER'S OBJECTIONS TO PATENT OWNER'S EVIDENCE
SUBMITTED WITH PATENT OWNER'S RESPONSE AND PATENT
OWNER'S MOTION FOR ADDITIONAL DISCOVERY**

Pursuant to 37 C.F.R. § 42.64(b)(1), Petitioner Samsung Electronics Co., Ltd. (“Samsung”) objects to the following exhibits filed by Patent Owner Netlist, Inc. (“Netlist”) with its Response (Paper No. 31) and its motion for additional discovery (Paper No. 30).

<u>Exhibit</u>	<u>Objection(s)</u>
EX2001 – Joint Development and License Agreement, November 12, 2015	401-403: EX2001 is irrelevant, cumulative, misleading, or confusing, and its probative value, if any, is outweighed by prejudice. The JDLA is the subject of a final judgment in district court and it is improper for Netlist to try to relitigate and collaterally attack that final judgment. Netlist cites this exhibit in connection with its argument that Samsung failed to address secondary considerations, Paper No. 31, 78–79 81, 83, but the mere fact that Samsung had a portfolio license agreement with Netlist is an insubstantial secondary consideration here (to the extent it is a secondary consideration and a large portfolio can establish nexus) given that Netlist contends it terminated the agreement and given the lack of any evidence that the 087 patent was a significant part of the portfolio license, especially in light of the impact of the JEDEC standards. Moreover, the Director rejected Netlist’s argument by instituting the 087 PGR. 801/802/901: Samsung further objects to EX2001 for lacking foundation and containing hearsay. <i>See</i> 37 C.F.R. § 42.62(a); Fed. R. Evid. 801–04. For example, Netlist has neither authenticated this exhibit, nor laid the foundation for any hearsay exception.

<u>Exhibit</u>	<u>Objection(s)</u>
EX2002 – Stock Purchase Warrant, November 18, 2015	401-403: EX2002 is irrelevant, cumulative, misleading, or confusing, and its probative value, if any, is outweighed by prejudice. Netlist cites this exhibit in connection with its argument that Samsung failed to address secondary considerations with respect to the JDLA, Paper No. 31, 78, 83, but the JDLA is the subject of a final judgment in district court and it is improper for Netlist to try to relitigate and collaterally attack that final judgment, and the mere fact that Samsung had a portfolio license agreement with Netlist is an insubstantial secondary consideration here (to the extent it is a secondary consideration and a large portfolio can establish nexus) given that Netlist contends it terminated the agreement and given the lack of any evidence that the 087 Patent was a significant part of the portfolio license, especially in light of the impact of the JEDEC standards. Moreover, the Director rejected Netlist’s argument by instituting the 087 PGR. 801/802/901: Samsung further objects to EX2002 for lacking foundation and containing hearsay. <i>See</i> 37 C.F.R. § 42.62(a); Fed. R. Evid. 801–04. For example, Netlist has neither authenticated this exhibit, nor laid the foundation for any hearsay exception.

<u>Exhibit</u>	<u>Objection(s)</u>
EX2003 – Senior Secured Convertible Promissory Note, November 18, 2015	401-403: EX2003 is irrelevant, cumulative, misleading, or confusing, and its probative value, if any, is outweighed by prejudice. Netlist cites this exhibit in connection with its argument that Samsung failed to address secondary considerations with respect to the JDLA, Paper No. 31, 78–79, but the JDLA is the subject of a final judgment in district court and it is improper for Netlist to try to relitigate and collaterally attack that final judgment, and the mere fact that Samsung had a portfolio license agreement with Netlist is an insubstantial secondary consideration here (to the extent it is a secondary consideration and a large portfolio can establish nexus) given that Netlist contends it terminated the agreement and given the lack of any evidence that the 087 Patent was a significant part of the portfolio license, especially in light of the impact of the JEDEC standards. Moreover, the Director rejected Netlist’s argument by instituting the 087 PGR. 801/802/901: Samsung further objects to EX2003 for lacking foundation and containing hearsay. <i>See</i> 37 C.F.R. § 42.62(a); Fed. R. Evid. 801–04. For example, Netlist has neither authenticated this exhibit, nor laid the foundation for any hearsay exception.

<u>Exhibit</u>	<u>Objection(s)</u>
EX2004 – Security Agreement by and between Netlist, Inc. and SVIC No. 28 New Technology Business Investment L.L.P., November 18, 2025	401-403: EX2004 is irrelevant, cumulative, misleading, or confusing, and its probative value, if any, is outweighed by prejudice. Netlist again cites this exhibit in connection with its argument that Samsung failed to address secondary considerations with respect to the JDLA, Paper No. 31, 78–79, 82–83, but the JDLA is the subject of a final judgment in district court and it is improper for Netlist to try to relitigate and collaterally attack that final judgment, and the mere fact that Samsung had a portfolio license agreement with Netlist is an insubstantial secondary consideration here (to the extent it is a secondary consideration and a large portfolio can establish nexus) given that Netlist contends it terminated the agreement and given the lack of any evidence that the 087 Patent was a significant part of the portfolio license, especially in light of the impact of the JEDEC standards. Moreover, the Director rejected Netlist’s argument by instituting the 087 PGR. 801/802/901: Samsung further objects to EX2004 for lacking foundation and containing hearsay. <i>See</i> 37 C.F.R. § 42.62(a); Fed. R. Evid. 801–04. For example, Netlist has neither authenticated this exhibit, nor laid the foundation for any hearsay exception.

<u>Exhibit</u>	<u>Objection(s)</u>
EX2005 – Samsung Venture Investment Corporation website, available at https://www.samsungventure.co.kr/english/jsp/company/company.jsp (last accessed October 12, 2025)	401-403: EX2005 is irrelevant, cumulative, misleading, or confusing, and its probative value, if any, is outweighed by prejudice. Netlist cites this exhibit in connection with its argument that Samsung failed to address secondary considerations with respect to the JDLA, Paper No. 31, 78, but the JDLA is the subject of a final judgment in district court and it is improper for Netlist to try to relitigate and collaterally attack that final judgment, and the mere fact that Samsung had a portfolio license agreement with Netlist is an insubstantial secondary consideration here (to the extent it is a secondary consideration and a large portfolio can establish nexus) given that Netlist contends it terminated the agreement and given the lack of any evidence that the 087 Patent was a significant part of the portfolio license, especially in light of the impact of the JEDEC standards. Moreover, the Director rejected Netlist’s argument by instituting the 087 PGR. 801/802/901: Samsung further objects to EX2005 for lacking foundation and containing hearsay. <i>See</i> 37 C.F.R. § 42.62(a); Fed. R. Evid. 801–04. For example, Netlist has neither authenticated this exhibit, nor laid the foundation for any hearsay exception.

<u>Exhibit</u>	<u>Objection(s)</u>
EX2006 –Recorded Assignment and IP Security Agreement, Reel No. 037150, Frame No. 0897, November 20, 2015	401-403: EX2006 is irrelevant, cumulative, misleading, or confusing, and its probative value, if any, is outweighed by prejudice. Netlist again cites this exhibit in connection with its argument that Samsung failed to address secondary considerations with respect to the JDLA, Paper No. 31, 78–79, 83, but the JDLA is the subject of a final judgment in district court and it is improper for Netlist to try to relitigate and collaterally attack that final judgment, and the mere fact that Samsung had a portfolio license agreement with Netlist is an insubstantial secondary consideration here (to the extent it is a secondary consideration and a large portfolio can establish nexus) given that Netlist contends it terminated the agreement and given the lack of any evidence that the 087 Patent was a significant part of the portfolio license, especially in light of the impact of the JEDEC standards. Moreover, the Director rejected Netlist’s argument by instituting the 087 PGR. 801/802/901: Samsung further objects to EX2006 for lacking foundation and containing hearsay. <i>See</i> 37 C.F.R. § 42.62(a); Fed. R. Evid. 801–04. For example, Netlist has neither authenticated this exhibit, nor laid the foundation for any hearsay exception.
EX2007 – Release of Assignment, Reel No. 065629, Frame No. 0330, November 20, 2023	401-403, 37 C.F.R. § 42.6(a)(3): In addition to the objections raised in Paper No. 23, EX2007 is irrelevant because it was not cited in POR or other exhibits. 801/802/901: Samsung further objects to EX2007 for lacking foundation and containing hearsay. <i>See</i> 37 C.F.R. § 42.62(a); Fed. R. Evid. 801–04. For example, Netlist has neither authenticated this exhibit, nor laid the foundation for any hearsay exception.

<u>Exhibit</u>	<u>Objection(s)</u>
EX2008 – Redacted First Amended Complaint for Breach of Contract and Declaratory Relief, <i>Netlist Inc. v. Samsung Electronics Co., Ltd.</i> , Case No. 8:20-cv-00993-JAK (C.D. Cal.), August 31, 2020	401-403, 37 C.F.R. § 42.6(a)(3): In addition to the objections raised in Paper No. 23, EX2008 is irrelevant because it was not cited in POR or other exhibits. 801/802: Samsung further objects to EX2008 for containing hearsay. <i>See</i> 37 C.F.R. § 42.62(a); Fed. R. Evid. 801–04.
EX2009 – Judgment, <i>Netlist Inc. v. Samsung Electronics Co., Ltd.</i> , Case No. 8:20-cv-00993-JAK (C.D. Cal.), April 7, 2025	401-403: Netlist cites EX2009 in connection with its argument that Samsung failed to address secondary considerations with respect to the JDLA, Paper No. 31, 84, but the JDLA is the subject of a final judgment in district court and it is improper for Netlist to try to relitigate and collaterally attack that final judgment, and the mere fact that Samsung had a portfolio license agreement with Netlist is an insubstantial secondary consideration here (to the extent it is a secondary consideration and a large portfolio can establish nexus) given that Netlist contends it terminated the agreement and given the lack of any evidence that the 087 Patent was a significant part of the portfolio license, especially in light of the impact of the JEDEC standards. Moreover, the Director rejected Netlist’s argument by instituting the 087 PGR.
EX2010 – Median time to trial statistics for the International Trade Commission, Docket Navigator report generated October 6, 2025	401-403, 37 C.F.R. § 42.6(a)(3): In addition to the objections raised in Paper No. 23, EX2010 is irrelevant because it was not cited in POR or other exhibits. 801/802/901: Samsung further objects to EX2010 for lacking foundation and for containing hearsay. <i>See</i> 37 C.F.R. § 42.62(a); Fed. R. Evid. 801–04. For example, Netlist has neither authenticated this exhibit, nor laid the foundation for any hearsay exception.

<u>Exhibit</u>	<u>Objection(s)</u>
EX2013 – First Amended Complaint, <i>Netlist Inc. v. Samsung Electronics Co., Ltd.</i> , Case No. 2:25-cv-00557 (E.D. Tex.), July 8, 2025	401-403: EX2013 is irrelevant, cumulative, misleading, or confusing, and its probative value, if any, is outweighed by prejudice. Netlist again cites this exhibit in connection with its argument that Samsung failed to name all RPIs, Paper No. 31, 6, 11, 19, but the fact that Netlist itself named the alleged RPIs as co-defendants in another district court case has little probative value to any RPI issues here. Also, the Director rejected Netlist’s RPI argument by instituting the 087 PGR. 801/802: Samsung further objects to EX2013 for containing hearsay. <i>See</i> 37 C.F.R. § 42.62(a); Fed. R. Evid. 801–04.
EX2014 – Verdict Form, <i>Netlist, Inc. v. Samsung Electronics Co. et al.</i> , Case No. 2:21-cv-00463-JRG (E.D. Tex.), April 21, 2023	401-403, 37 C.F.R. § 42.6(a)(3): In addition to the objections raised in Paper No. 23, EX2014 is irrelevant because it was not cited in POR or other exhibits.

<u>Exhibit</u>	<u>Objection(s)</u>
EX2015 – Complaint, <i>In the Matter of Certain Dynamic Random Access Memory (DRAM) Devices, Products Containing the Same, and Components Thereof</i>, Investigation No. 337-TA-3854 (I.T.C.), September 29, 2025	401-403: EX2015 is irrelevant, cumulative, misleading, or confusing, and its probative value, if any, is outweighed by prejudice. Netlist again cites this exhibit in connection with its argument that Samsung failed to name all RPis, Paper No. 31, 7, 11, and to address secondary considerations, <i>id.</i>, 86, but the fact that Netlist itself named the alleged RPis as co-defendants in another ITC case has little probative value to any RPI issues here. Further, with respect to secondary considerations, the JDLA is the subject of a final judgment in district court and it is improper for Netlist to try to relitigate and collaterally attack that final judgment, and the mere fact that Samsung or SK hynix had a portfolio license agreement with Netlist is an insubstantial secondary consideration here (to the extent it is a secondary consideration and a large portfolio can establish nexus) given that Netlist contends it terminated the JDLA agreement and given the lack of any evidence that the 087 Patent was a significant part of the portfolio license, especially in light of the impact of the JEDEC standards. Indeed, Director rejected Netlist’s both arguments about RPI and secondary considerations by instituting the 087 PGR. 801/802: Samsung further objects to EX2015 for containing hearsay. <i>See</i> 37 C.F.R. § 42.62(a); Fed. R. Evid. 801–04.
EX2016 – Samsung Defendants’ P.R. 3-3 Invalidity Contentions, <i>Netlist Inc. v. Samsung Electronics Co., Ltd.</i>, Case No. 2:25-cv-00557 (E.D. Tex.), September 24, 2025	401-403: EX2016 is irrelevant, cumulative, misleading, or confusing, and its probative value, if any, is outweighed by prejudice. Netlist cites this exhibit in connection with its argument that Samsung failed to name all RPis, Paper No. 31, 13, 16, but the mere fact that SEA joined in the invalidity contentions served by its parent SEC has little probative value to the RPI issue. Also, the Director rejected Netlist’s RPI argument by instituting the 087 PGR.

<u>Exhibit</u>	<u>Objection(s)</u>
EX2017 – Verdict Form, <i>Netlist, Inc. v. Samsung Electronics Co. et al.</i> , Case No. 2:22-cv-00293-JRG (E.D. Tex.), November 22, 2024	401-403, 37 C.F.R. § 42.6(a)(3): In addition to the objections raised in Paper No. 23, EX2017 is irrelevant because it was not cited in POR or other exhibits.
EX2018 – List of Patent Trial and Appeal Board proceedings filed by Samsung Electronics Co., Ltd. against Netlist, Inc.’s Patents, Docket Navigator, generated November 3, 2025	401-403, 37 C.F.R. § 42.6(a)(3): In addition to the objections raised in Paper No. 23, EX2018 is irrelevant because it was not cited in POR or other exhibits. 801/802/901: Samsung further objects to EX2018 for lacking foundation and for containing hearsay. <i>See</i> 37 C.F.R. § 42.62(a); Fed. R. Evid. 801–04. For example, Netlist has neither authenticated this exhibit, nor laid the foundation for any hearsay exception.
EX2020 – Excerpts from PTAB 2025 Intelligence Report, Patexia, Inc.	401-403: EX2020 is irrelevant, cumulative, misleading, or confusing, and its probative value, if any, is outweighed by prejudice. Netlist again cites this exhibit in connection with its argument that Samsung failed to name all RPis, Paper No. 31, 18, but naming an RPI in <i>other</i> proceedings involving other products is irrelevant to the RPI issue in <i>this</i> proceeding. Also, the Director rejected Netlist’s RPI argument by instituting the 087 PGR. 801/802/901: Samsung further objects to EX2020 for lacking foundation and for containing hearsay. <i>See</i> 37 C.F.R. § 42.62(a); Fed. R. Evid. 801–04. For example, Netlist has neither authenticated this exhibit, nor laid the foundation for any hearsay exception.

<u>Exhibit</u>	<u>Objection(s)</u>
EX2021 – Ramkumar, A., “Trump Takes Aim at Chip Makers With New Plan to Throttle Imports,” The Wall Street Journal, September 26, 2025, accessible at https://www.wsj.co m/economy/trade/tru mp-chip-tariffs- exemptions- 90fa2ab3 (last accessed September 26, 2025)	401-403, 37 C.F.R. § 42.6(a)(3): In addition to the objections raised in Paper No. 23, EX2021 is irrelevant because it was not cited in POR or other exhibits. 801/802/901: Samsung further objects to EX2021 for lacking foundation and for containing hearsay. <i>See</i> 37 C.F.R. § 42.62(a); Fed. R. Evid. 801–04. For example, Netlist has neither authenticated this exhibit, nor laid the foundation for any hearsay exception.

<u>Exhibit</u>	<u>Objection(s)</u>
EX2022 – Netlist, Inc. Form 8-K, United States Securities and Exchange Commission, November 12, 2015	401-403: EX2022 is irrelevant, cumulative, misleading, or confusing, and its probative value, if any, is outweighed by prejudice. Netlist cites this exhibit in connection with its argument that Samsung failed to address secondary considerations with respect to the JDLA, Paper No. 31, 78, but Netlist’s general financial information lacks relevancy to the license analysis in the context of secondary considerations. Also, the JDLA is the subject of a final judgment in district court and it is improper for Netlist to try to relitigate and collaterally attack that final judgment, and the mere fact that Samsung had a portfolio license agreement with Netlist is an insubstantial secondary consideration here (to the extent it is a secondary consideration and a large portfolio can establish nexus) given that Netlist contends it terminated the agreement and given the lack of any evidence that the 087 Patent was a significant part of the portfolio license, especially in light of the impact of the JEDEC standards. Moreover, the Director rejected Netlist’s argument by instituting the 087 PGR. 801/802/901: Samsung further objects to EX2022 for lacking foundation and for containing hearsay. <i>See</i> 37 C.F.R. § 42.62(a); Fed. R. Evid. 801–04. For example, Netlist has neither authenticated this exhibit, nor laid the foundation for any hearsay exception.

<u>Exhibit</u>	<u>Objection(s)</u>
EX2023 – “Netlist and SK hynix Enter into Strategic Agreements for Patents, Technology and Product Supply,” Netlist Press Release, April 5, 2021	401-403: EX2023 is irrelevant, cumulative, misleading, or confusing, and its probative value, if any, is outweighed by prejudice. Netlist cites this exhibit in connection with its argument that Samsung failed to address secondary considerations with respect to a license between Netlist and SK hynix, Paper No. 31, 88, but the mere fact that SK hynix may have had a portfolio license agreement with Netlist is an insubstantial secondary consideration here (to the extent it is a secondary consideration and a large portfolio can establish nexus) given the lack of any evidence that the 087 Patent was a significant part of the portfolio license, especially in light of the impact of the JEDEC standards. Moreover, the Director rejected Netlist’s argument by instituting the 087 PGR. 801/802/901: Samsung further objects to EX2023 for lacking foundation and for containing hearsay. <i>See</i> 37 C.F.R. § 42.62(a); Fed. R. Evid. 801–04. For example, Netlist has neither authenticated this exhibit, nor laid the foundation for any hearsay exception.
EX2024 – Comparison of Claim 1 of U.S. Patent No. 12,308,087 with Claim 1 of U.S. Patent No. 8,787,060 and Claim 1 of U.S. Patent No. 9,318,160	401-403, 37 C.F.R. § 42.6(a)(3): In addition to the objections raised in Paper No. 23, EX2024 is irrelevant because it was not cited in POR or other exhibits. 801/802/901: Samsung further objects to EX2024 for lacking foundation and for containing hearsay. <i>See</i> 37 C.F.R. § 42.62(a); Fed. R. Evid. 801–04. For example, Netlist has neither authenticated this exhibit, nor laid the foundation for any hearsay exception.
EX2025 – Written Decision on Registration, Korean Patent Application No. 10-2017-0113355, mailed March 24, 2022	401-403, 37 C.F.R. § 42.6(a)(3): In addition to the objections raised in Paper No. 23, EX2025 is irrelevant because it was not cited in POR or other exhibits.

<u>Exhibit</u>	<u>Objection(s)</u>
EX2027 – Opening Brief for Appellant Netlist, Inc., Netlist, Inc. v. Samsung Electronics Co., Ltd., Case No. 24-2240 (Fed. Cir.), February 4, 2025	401-403, 37 C.F.R. § 42.6(a)(3): In addition to the objections raised in Paper No. 23, EX2027 is irrelevant because it was not cited in POR or other exhibits. 801/802/901: Samsung further objects to EX2027 for lacking foundation and for containing hearsay. <i>See</i> 37 C.F.R. § 42.62(a); Fed. R. Evid. 801–04. For example, Netlist has neither authenticated this exhibit, nor laid the foundation for any hearsay exception.
EX2028 – Joint Appendix Volume II of II, <i>Netlist, Inc. v. Samsung Electronics Co., Ltd.</i> , Case No. 24-2240 (Fed. Cir.), May 28, 2025	401-403, 37 C.F.R. § 42.6(a)(3): In addition to the objections raised in Paper No. 23, EX2028 is irrelevant because it was not cited in POR or other exhibits. 801/802/901: Samsung further objects to EX2028 for lacking foundation and for containing hearsay. <i>See</i> 37 C.F.R. § 42.62(a); Fed. R. Evid. 801–04. For example, Netlist has neither authenticated this exhibit, nor laid the foundation for any hearsay exception.
EX2029 – Morris, A., “IPBC Global 2025: Acting USPTO Director says IPR use needs to change,” IAM, June 10, 2025, accessible at https://www.iam-media.com/article/ipbc-global-2025-acting-uspto-director-says-ipr-use-needs-change (last accessed June 16, 2025)	401-403, 37 C.F.R. § 42.6(a)(3): In addition to the objections raised in Paper No. 23, EX2029 is irrelevant because it was not cited in POR or other exhibits. 801/802/901: Samsung further objects to EX2029 for lacking foundation and for containing hearsay. <i>See</i> 37 C.F.R. § 42.62(a); Fed. R. Evid. 801–04. For example, Netlist has neither authenticated this exhibit, nor laid the foundation for any hearsay exception.

<u>Exhibit</u>	<u>Objection(s)</u>
EX2035 – List of Patent Trial and Appeal Board proceedings listing Samsung Electronics America, Inc. as Petitioner, Docket Navigator, generated December 3, 2025	401-403: EX2035 is irrelevant, cumulative, misleading, or confusing, and its probative value, if any, is outweighed by prejudice. Netlist again cites this exhibit in connection with its argument that Samsung failed to name all RPis, Paper No. 31, 18, but naming an RPI in <i>other</i> proceedings involving other products is irrelevant to the RPI issue in <i>this</i> proceeding. Also, the Director rejected Netlist’s RPI argument by instituting the 087 PGR. 801/802/901: Samsung further objects to EX2028 for lacking foundation and for containing hearsay. <i>See</i> 37 C.F.R. § 42.62(a); Fed. R. Evid. 801–04. For example, Netlist has neither authenticated this exhibit, nor laid the foundation for any hearsay exception.
EX2036 – Redline Comparison of Independent Claim 1 and Independent Claims 9, 13, 20, 23, and 24 of U.S. Patent No. 12,308,087	401-403, 37 C.F.R. § 42.6(a)(3): In addition to the objections raised in Paper No. 23, EX2036 is irrelevant because it was not cited in POR or other exhibits. 801/802/901: Samsung further objects to EX2036 for lacking foundation and for containing hearsay. <i>See</i> 37 C.F.R. § 42.62(a); Fed. R. Evid. 801–04. For example, Netlist has neither authenticated this exhibit, nor laid the foundation for any hearsay exception.
EX2037 – Word Counts of Petitions in IPR2025-01402 and PGR2025-00071, including image annotations	401-403, 37 C.F.R. § 42.6(a)(3): In addition to the objections raised in Paper No. 23, EX2037 is irrelevant because it was not cited in POR or other exhibits. 801/802/901: Samsung further objects to EX2037 for lacking foundation and for containing hearsay. <i>See</i> 37 C.F.R. § 42.62(a); Fed. R. Evid. 801–04. For example, Netlist has neither authenticated this exhibit, nor laid the foundation for any hearsay exception.

<u>Exhibit</u>	<u>Objection(s)</u>
EX2038 – Final Judgment, <i>Netlist, Inc. v. Samsung Electronics Co., Ltd. et al.</i> , Case No. 2:21-cv-00463-JRG (E.D. Tex.), August 11, 2023	401-403: EX2038 is irrelevant, cumulative, misleading, or confusing, and its probative value, if any, is outweighed by prejudice. Netlist cites this exhibit in connection with its argument that Samsung failed to name all RPIs, Paper No. 31, 7, 13, but the Director rejected Netlist’s RPI argument by instituting the 087 PGR.
EX2039 – Trial Transcript, Volume 3, <i>Netlist, Inc. v. Samsung Electronics Co., Ltd. et al.</i> , Case No. 2:21-cv-00463-JRG (E.D. Tex.), April 18, 2023	401-403: EX2039 is irrelevant, cumulative, misleading, or confusing, and its probative value, if any, is outweighed by prejudice. Netlist cites this exhibit in connection with its argument that Samsung failed to address secondary considerations with respect to a license between Netlist and SK hynix, Paper No. 31, 89, but the mere fact that SK hynix may have had a portfolio license agreement with Netlist is an insubstantial secondary consideration here (to the extent it is a secondary consideration and a large portfolio can establish nexus) given the lack of any evidence that the 087 Patent was a significant part of the portfolio license, especially in light of the impact of the JEDEC standards. Moreover, the Director rejected Netlist’s argument by instituting the 087 PGR. 801-804: Samsung objects to EX2039 for containing hearsay and/or causing undue prejudice. The testimony in EX2039 concerned different patents and issues and was not taken in this PGR, making it hearsay, and Netlist has not laid the foundation for any hearsay exception. EX2039 is also defective, and thus inadmissible, under 37 C.F.R. § 42.53(f)(5)-(6).

<u>Exhibit</u>	<u>Objection(s)</u>
EX2042 – Netlist’s Petition for the Director to Suspend the Rules and Deny the Request for Reexamination Under 35 U.S.C. §§ 303(a) and 325(d), <i>Ex Parte</i> Reexamination Control No. 90/015,449, filed October 17, 2025	401-403, 37 C.F.R. § 42.6(a)(3): In addition to the objections raised in Paper No. 23, EX2042 is irrelevant because it was not cited in POR or other exhibits. 801/802/901: Samsung further objects to EX2042 for lacking foundation and for containing hearsay. <i>See</i> 37 C.F.R. § 42.62(a); Fed. R. Evid. 801–04. For example, Netlist has neither authenticated this exhibit, nor laid the foundation for any hearsay exception.
EX2043 – Complaint, <i>Netlist, Inc. v. Samsung Elecs. Co., Ltd. et al.</i> , Case No. 2:25-cv-00748-JRG (E.D. Tex.), July 28, 2025	401-403, 37 C.F.R. § 42.6(a)(3): In addition to the objections raised in Paper No. 23, EX2043 is irrelevant because it was not cited in POR or other exhibits. 801/802/901: Samsung further objects to EX2043 for lacking foundation and for containing hearsay. <i>See</i> 37 C.F.R. § 42.62(a); Fed. R. Evid. 801–04. For example, Netlist has neither authenticated this exhibit, nor laid the foundation for any hearsay exception.
EX2046 – Samsung’s Certificate of Interest, <i>Netlist, Inc. v. Samsung Electronics Co., Ltd.</i> , Appeal No. 24-2203 (Fed. Cir.), August 27, 2024	401-403: EX2046 is irrelevant, cumulative, misleading, or confusing, and its probative value, if any, is outweighed by prejudice. Netlist again cites this exhibit in connection with its argument that Samsung failed to name all RPIs, Paper No. 31, 7, 10, 13, but nothing in this exhibit concerning the appeal of another case is relevant to the RPI issue in this proceeding, and the Director rejected Netlist’s RPI argument by instituting the 087 PGR.

<u>Exhibit</u>	<u>Objection(s)</u>
EX2047 – Company Profile, Avnet, Inc., accessible at https://s23.q4cdn.com/291570380/files/doc_downloads/fact-sheet/2020/Avnet-Fact-Sheet.pdf (last accessed December 22, 2025)	401-403: EX2047 is irrelevant, cumulative, misleading, or confusing, and its probative value, if any, is outweighed by prejudice. Netlist again cites this exhibit in connection with its argument that Samsung failed to name all RPIs, Paper No. 31, 19, but the Director rejected Netlist’s RPI argument by instituting the 087 PGR. Netlist further incorrectly cites EX2047 with respect to a discussion about prior art (<u>Keeth</u>, EX1047). <i>Id.</i>, 75. 801/802/901: Samsung further objects to EX2047 for lacking foundation and for containing hearsay. <i>See</i> 37 C.F.R. § 42.62(a); Fed. R. Evid. 801–04. For example, Netlist has neither authenticated this exhibit, nor laid the foundation for any hearsay exception.
EX2048 – “Samsung Authorized Distributor Avnet Americas,” Avnet, Inc., accessible at https://www.avnet.com/americas/manufacturers/m/samsung/ (last accessed December 22, 2025)	401-403: EX2048 is irrelevant, cumulative, misleading, or confusing, and its probative value, if any, is outweighed by prejudice. Netlist again cites this exhibit in connection with its argument that Samsung failed to name all RPIs, Paper No. 31, 19, but the Director rejected Netlist’s RPI argument by instituting the 087 PGR. 801/802/901: Samsung further objects to EX2048 for lacking foundation and for containing hearsay. <i>See</i> 37 C.F.R. § 42.62(a); Fed. R. Evid. 801–04. For example, Netlist has neither authenticated this exhibit, nor laid the foundation for any hearsay exception.

<u>Exhibit</u>	<u>Objection(s)</u>
EX2058 – Declaration of Michael C. Brogioli in Support of Patent Owner’s Response	602/702/703; 37 C.F.R. § 42.65: Netlist has not established that Michael Brogioli is an expert in the area of standardized DRAM and SDRAM memory devices and memory modules at the relevant timeframe, and Netlist has not met its burden to show that his testimony on this issue is based on sufficient facts or data, is the product of reliable principles or methods, or that the testimony will help the Board understand the evidence or determine a fact in issue. <i>See, e.g.</i>, EX2058, ¶¶ 4–15. 801/802/901: Samsung further objects to EX2058 to the extent it cites to and incorporates evidence (such as each exhibit below) that is inadmissible (including hearsay).
EX2059 – <i>Curriculum Vitae</i> of of Michael C. Brogioli	401-403: EX2059 is cited in the Brogioli Declaration (EX2058) as his CV. As the declaration is inadmissible as set forth above, so is this exhibit. 801/802: Samsung further objects to EX2059 for containing hearsay. <i>See</i> 37 C.F.R. § 42.62(a); Fed. R. Evid. 801–04.
EX2060 – Transcript of the Deposition of Andrew Wolfe, Ph.D., May 22, 2026	EX2060 is defective, and thus inadmissible, under 37 C.F.R. § 42.53(f)(5)-(6). EX2060 is also inaccurate and incomplete, and thus objectionable under at least FRE 106, at least because Patent Owner did not include the errata served on June 2, 2026. Samsung also objects to EX2060 for each of the reasons noted in the objections made during the taking of the underlying deposition.

<u>Exhibit</u>	<u>Objection(s)</u>
EX2061 – Declaration of David Kennedy (HIGHLY CONFIDENTIAL – OUTSIDE COUNSEL EYES’ ONLY)	401-403; 37 C.F.R. § 42.65(a): EX2061 is irrelevant, cumulative, misleading, or confusing, and its probative value, if any, is outweighed by prejudice. The JDLA is the subject of a final judgment in district court and it is improper for Netlist to try to relitigate and collaterally attack that final judgment. Netlist cites this exhibit in connection with its argument that Samsung failed to address secondary considerations, but the mere fact that Samsung or SK hynix had a portfolio license agreement with Netlist is an insubstantial secondary consideration here (to the extent it is a secondary consideration and a large portfolio can establish nexus) given that Netlist contends it terminated the agreement and given the lack of any evidence that the 087 Patent was a significant part of the portfolio licenses, especially in light of the impact of the JEDEC standards. Moreover, the Director rejected Netlist’s argument by instituting the 087 PGR. 602/702/703; 37 C.F.R. § 42.65: Netlist has not established that Mr. David Kennedy is an expert in the area of IP valuation and licensing in the context of secondary considerations, and Netlist has not met its burden to show that his testimony on this issue is based on sufficient facts or data or facts or data that an expert in the field would reasonably rely upon in forming an opinion on the subject, is the product of reliable principles or methods and reflects a reliable application of the principles and methods to the facts of the case, or that the testimony will help the Board understand the evidence or determine a fact in issue. <i>See, e.g.</i>, EX2061, ¶¶ 4–13. 801/802/901: Samsung further objects to EX2061 to the extent it cites to and incorporates evidence (such as each exhibit below) that is inadmissible (including hearsay). <i>See, e.g.</i>, EX2061, ¶¶ 17, 18–19, 24–26, 42, 45–46.

<u>Exhibit</u>	<u>Objection(s)</u>
EX2062 – <i>Curriculum Vitae</i> of David Kennedy	401-403: EX2062 is cited in the Kennedy Declaration (EX2058) as his CV. As the declaration is inadmissible as set forth above, so is this exhibit. 801/802: Samsung further objects to EX2062 for containing hearsay. <i>See</i> 37 C.F.R. § 42.62(a); Fed. R. Evid. 801–04.
EX2063 – Excerpts of Strategic Product Supply and License Agreement between Netlist, Inc. and SK hynix Inc.	106: EX2063 is incomplete and it is unfair to introduce only part of a document while withholding the rest of the document. 401-403: EX2063 is irrelevant, cumulative, misleading, or confusing, and its probative value, if any, is outweighed by prejudice. Netlist cites this exhibit in connection with its argument that Samsung failed to address secondary considerations with respect to a license between Netlist and SK hynix, Paper No. 31, 85–87, but the mere fact that SK hynix may have had a portfolio license agreement with Netlist is an insubstantial secondary consideration here (to the extent it is a secondary consideration and a large portfolio can establish nexus) given the lack of any evidence that the 087 Patent was a significant part of the portfolio license, especially in light of the impact of the JEDEC standards. Moreover, the Director rejected Netlist’s argument by instituting the 087 PGR. 801/802/901: Samsung further objects to EX2063 for lacking foundation, for containing hearsay, and/or causing undue prejudice. <i>See</i> 37 C.F.R. § 42.62(a); Fed. R. Evid. 801–04. For example, Netlist has neither authenticated this exhibit, nor laid the foundation for any hearsay exception.

<u>Exhibit</u>	<u>Objection(s)</u>
EX2064 – High Bandwidth Memory Company List, Mordor Intelligence, accessible at https://www.mordorintelligence.com/industry-reports/high-bandwidth-memory-market/companies	401-403: EX2064 is irrelevant, cumulative, misleading, or confusing, and its probative value, if any, is outweighed by prejudice. Netlist cites this exhibit in connection with its argument that Samsung failed to address secondary considerations with respect to the JDLA and a license between Netlist and SK hynix, Paper No. 31, 77, 82, 86, but the general market position of the licensees lacks relevancy to the license analysis in the context of secondary considerations. Also, the JDLA is the subject of a final judgment in district court and it is improper for Netlist to try to relitigate and collaterally attack that final judgment, and the mere fact that Samsung or SK hynix had a portfolio license agreement with Netlist is an insubstantial secondary consideration here (to the extent it is a secondary consideration and a large portfolio can establish nexus) given that Netlist contends it terminated the JDLA and given the lack of any evidence that the 087 Patent was a significant part of either of the portfolio licenses, especially in light of the impact of the JEDEC standards. Moreover, the Director rejected Netlist’s argument by instituting the 087 PGR. 801/802/901: Samsung further objects to EX2064 for lacking foundation, for containing hearsay, and/or causing undue prejudice. <i>See</i> 37 C.F.R. § 42.62(a); Fed. R. Evid. 801–04. For example, Netlist has neither authenticated this exhibit, nor laid the foundation for any hearsay exception.

<u>Exhibit</u>	<u>Objection(s)</u>
EX2068 – Memorandum Opinion and Order, <i>Netlist, Inc. v. SK hynix Inc. et al.</i>, Case No. 6:20-cv-00525 (W.D. Tex., Feb. 2, 2021), ECF No. 30	401-403: EX2068 is irrelevant, cumulative, misleading, or confusing, and its probative value, if any, is outweighed by prejudice. Netlist cites this exhibit in connection with its argument that Samsung failed to address secondary considerations with respect to a license between Netlist and SK hynix, Paper No. 31, 87, but the timing of Netlist’s settlement of litigation with SK hynix lacks relevancy to the license analysis in the context of secondary considerations. Also, the mere fact that SK hynix may have had a portfolio license agreement with Netlist is an insubstantial secondary consideration here (to the extent it is a secondary consideration and a large portfolio can establish nexus) given the lack of any evidence that the 087 Patent was a significant part of the portfolio license, especially in light of the impact of the JEDEC standards. Moreover, the Director rejected Netlist’s argument by instituting the 087 PGR. 801/802: Samsung further objects to EX2068 for containing hearsay. <i>See</i> 37 C.F.R. § 42.62(a); Fed. R. Evid. 801–04.

<u>Exhibit</u>	<u>Objection(s)</u>
EX2073 – “Global DRAM and HBM Market Share: Quarterly,” Counterpoint Technology Market Research, March 28, 2026	401-403: EX2073 is irrelevant, cumulative, misleading, or confusing, and its probative value, if any, is outweighed by prejudice. Netlist cites this exhibit in connection with its argument that Samsung failed to address secondary considerations with respect to the JDLA and a license between Netlist and SK hynix, Paper No. 31, 77, 82, but general market share data for the DRAM and HBM markets lacks relevancy to the license analysis in the context of secondary considerations. Also, the JDLA is the subject of a final judgment in district court and it is improper for Netlist to try to relitigate and collaterally attack that final judgment, and the mere fact that Samsung or SK hynix had a portfolio license agreement with Netlist is an insubstantial secondary consideration here (to the extent it is a secondary consideration and a large portfolio can establish nexus) given that Netlist contends it terminated the JDLA and given the lack of any evidence that the 087 Patent was a significant part of either of the portfolio licenses, especially in light of the impact of the JEDEC standards. Moreover, the Director rejected Netlist’s argument by instituting the 087 PGR. 801/802/901: Samsung further objects to EX2073 for lacking foundation, for containing hearsay, and/or causing undue prejudice. <i>See</i> 37 C.F.R. § 42.62(a); Fed. R. Evid. 801–04. For example, Netlist has neither authenticated this exhibit, nor laid the foundation for any hearsay exception.

<u>Exhibit</u>	<u>Objection(s)</u>
EX2075 – Netlist, Inc. Form 10-K for the Fiscal Year Ended December 30, 2017	401-403: EX2075 is irrelevant, cumulative, misleading, or confusing, and its probative value, if any, is outweighed by prejudice. Netlist cites this exhibit only through the Kennedy Declaration, EX2061, ¶25, in connection with its argument that Samsung failed to address secondary considerations with respect to the JDLA, but Netlist’s general financial information lacks relevancy to the license analysis in the context of secondary considerations. Also, the JDLA is the subject of a final judgment in district court and it is improper for Netlist to try to relitigate and collaterally attack that final judgment, and the mere fact that Samsung had a portfolio license agreement with Netlist is an insubstantial secondary consideration here (to the extent it is a secondary consideration and a large portfolio can establish nexus) given that Netlist contends it terminated the agreement and given the lack of any evidence that the 087 Patent was a significant part of the portfolio license, especially in light of the impact of the JEDEC standards. Moreover, the Director rejected Netlist’s argument by instituting the 087 PGR. 801/802/901: Samsung further objects to EX2075 for lacking foundation, for containing hearsay, and/or causing undue prejudice. <i>See</i> 37 C.F.R. § 42.62(a); Fed. R. Evid. 801–04. For example, Netlist has neither authenticated this exhibit, nor laid the foundation for any hearsay exception.

<u>Exhibit</u>	<u>Objection(s)</u>
EX2076 – “Netlist’s (NLST) CEO Chuck Hong on Q4 2015 Results - Earnings Call Transcript,” Seeking Alpha, February 29, 2016, accessible at https://seekingalpha.com/article/3942336-netlists-nlst-ceo-chuck-hong-on-q4-2015-results-earnings-call-transcript	401-403: EX2076 is irrelevant, cumulative, misleading, or confusing, and its probative value, if any, is outweighed by prejudice. Netlist cites this exhibit in connection with its argument that Samsung failed to address secondary considerations with respect to the JDLA, Paper No. 31, 83, but statements by Netlist’s CEO about access to Samsung products lack relevancy to the license analysis in the context of secondary considerations. Also, the JDLA is the subject of a final judgment in district court and it is improper for Netlist to try to relitigate and collaterally attack that final judgment, and the mere fact that Samsung had a portfolio license agreement with Netlist is an insubstantial secondary consideration here (to the extent it is a secondary consideration and a large portfolio can establish nexus) given that Netlist contends it terminated the agreement and given the lack of any evidence that the 087 Patent was a significant part of the portfolio license, especially in light of the impact of the JEDEC standards. Moreover, the Director rejected Netlist’s argument by instituting the 087 PGR. 801/802/901: Samsung further objects to EX2076 for lacking foundation and for containing hearsay. <i>See</i> 37 C.F.R. § 42.62(a); Fed. R. Evid. 801–04. For example, Netlist has neither authenticated this exhibit, nor laid the foundation for any hearsay exception.

<u>Exhibit</u>	<u>Objection(s)</u>
EX2077 – “Netlist’s (NLST) CEO Chuck Hong on Q3 2016 Results - Earnings Call Transcript,” Seeking Alpha, November 14, 2016, accessible at https://seekingalpha.com/article/4023357-netlists-nlst-ceo-chuck-hong-on-q3-2016-results-earnings-call-transcript	401-403: EX2077 is irrelevant, cumulative, misleading, or confusing, and its probative value, if any, is outweighed by prejudice. Netlist cites this exhibit in connection with its argument that Samsung failed to address secondary considerations with respect to the JDLA, Paper No. 31, 83, but statements by Netlist’s CEO about access to Samsung products lack relevancy to the license analysis in the context of secondary considerations. Also, the JDLA is the subject of a final judgment in district court and it is improper for Netlist to try to relitigate and collaterally attack that final judgment, and the mere fact that Samsung had a portfolio license agreement with Netlist is an insubstantial secondary consideration here (to the extent it is a secondary consideration and a large portfolio can establish nexus) given that Netlist contends it terminated the agreement and given the lack of any evidence that the 087 Patent was a significant part of the portfolio license, especially in light of the impact of the JEDEC standards. Moreover, the Director rejected Netlist’s argument by instituting the 087 PGR. 801/802/901: Samsung further objects to EX2077 for lacking foundation and for containing hearsay. <i>See</i> 37 C.F.R. § 42.62(a); Fed. R. Evid. 801–04. For example, Netlist has neither authenticated this exhibit, nor laid the foundation for any hearsay exception.

<u>Exhibit</u>	<u>Objection(s)</u>
EX2078 – Order Re: Motions For Summary Judgment And Related Applications, <i>Netlist Inc. v. Samsung Electronics Co., Ltd.</i>, Case No. 8:20-cv-00993 (C.D. Cal., Oct. 14, 2021), ECF No. 186	106: EX2078 was the subject of subsequent litigation and appeals and it is unfair to introduce this exhibit without introducing later related documents affecting this exhibit. 401-403: EX2078 is irrelevant, cumulative, misleading, or confusing, and its probative value, if any, is outweighed by prejudice. Netlist cites this exhibit in connection with its argument that Samsung failed to address secondary considerations with respect to the JDLA, Paper No. 31, 83–84, but the JDLA is the subject of a final judgment in district court and it is improper for Netlist to try to relitigate and collaterally attack that final judgment, and the mere fact that Samsung had a portfolio license agreement with Netlist is an insubstantial secondary consideration here (to the extent it is a secondary consideration and a large portfolio can establish nexus) given that Netlist contends it terminated the agreement and given the lack of any evidence that the 087 Patent was a significant part of the portfolio license, especially in light of the impact of the JEDEC standards. Moreover, the Director rejected Netlist’s argument by instituting the 087 PGR. 801/802: Samsung further objects to EX2078 for containing hearsay. <i>See</i> 37 C.F.R. § 42.62(a); Fed. R. Evid. 801–04.

<u>Exhibit</u>	<u>Objection(s)</u>
EX2079 – Udick, S., “Patent Law and the Emigration of Innovation,” <i>Washington Law Review</i>, 94(1):119-170 (March 1, 2019)	401-403; 37 C.F.R. § 42.65(a): EX2079 is irrelevant, cumulative, misleading, or confusing, and its probative value, if any, is outweighed by prejudice. Testimony about patent law is not admissible. Netlist cites this exhibit in connection with its argument that Samsung failed to address secondary considerations with respect to a license between Netlist and SK hynix, Paper No. 31, 87–88, but a law review article about general cost of patent litigation lacks relevancy to the license analysis in the context of secondary considerations. Also, the mere fact that SK hynix may have had a portfolio license agreement with Netlist is an insubstantial secondary consideration here (to the extent it is a secondary consideration and a large portfolio can establish nexus) given the lack of any evidence that the 087 Patent was a significant part of the portfolio license, especially in light of the impact of the JEDEC standards. Moreover, the Director rejected Netlist’s argument by instituting the 087 PGR. 801/802/901: Samsung further objects to EX2079 for lacking foundation and for containing hearsay. <i>See</i> 37 C.F.R. § 42.62(a); Fed. R. Evid. 801–04. For example, Netlist has neither authenticated this exhibit, nor laid the foundation for any hearsay exception.

<u>Exhibit</u>	<u>Objection(s)</u>
EX2080 – Email from Kenny Han to JB Kim, May 18, 2015 (CONFIDENTIAL – PROTECTIVE ORDER MATERIAL)	106: EX2080 appears to be one email in a series of email communications, and it is unfair to introduce this exhibit without introducing other related documents relevant to the context of this exhibit. 401-403: EX2080 is irrelevant, cumulative, misleading, or confusing, and its probative value, if any, is outweighed by prejudice. Netlist cites this exhibit in connection with its argument that Samsung failed to address secondary considerations with respect to the JDLA, Paper No. 31, 81–82, but Samsung’s alleged goal of entering JDLA — which involved NVDIMM-P unrelated to the subject matter of the ’087 Patent — lacks relevancy to the license analysis in the context of secondary considerations. Also, the JDLA is the subject of a final judgment in district court and it is improper for Netlist to try to relitigate and collaterally attack that final judgment, and the mere fact that Samsung had a portfolio license agreement with Netlist is an insubstantial secondary consideration here (to the extent it is a secondary consideration and a large portfolio can establish nexus) given that Netlist contends it terminated the agreement and given the lack of any evidence that the 087 Patent was a significant part of the portfolio license, especially in light of the impact of the JEDEC standards. Moreover, the Director rejected Netlist’s argument by instituting the 087 PGR. 801/802/901: Samsung further objects to EX2080 for lacking foundation and for containing hearsay. <i>See</i> 37 C.F.R. § 42.62(a); Fed. R. Evid. 801–04. For example, Netlist has neither authenticated this exhibit, nor laid the foundation for any hearsay exception.

<u>Exhibit</u>	<u>Objection(s)</u>
EX2081 – Technology Partnership and IP Cooperation Agreement – Term Sheet (Preliminary Outline), May 18, 2015 (CONFIDENTIAL – PROTECTIVE ORDER MATERIAL)	EX2081 purports to be attached to EX2080 and is objectionable for at least the same reasons provided above for EX2080. 401-403: EX2081 is irrelevant, cumulative, misleading, or confusing, and its probative value, if any, is outweighed by prejudice. Netlist cites this exhibit in connection with its argument that Samsung failed to address secondary considerations with respect to the JDLA, Paper No. 31, 82, but a preliminary term sheet for a technology partnership (NVDIMM-P) unrelated to the subject matter of the '087 Patent lacks relevancy to the license analysis in the context of secondary considerations. Also, the JDLA is the subject of a final judgment in district court and it is improper for Netlist to try to relitigate and collaterally attack that final judgment, and the mere fact that Samsung had a portfolio license agreement with Netlist is an insubstantial secondary consideration here (to the extent it is a secondary consideration and a large portfolio can establish nexus) given that Netlist contends it terminated the agreement and given the lack of any evidence that the 087 Patent was a significant part of the portfolio license, especially in light of the impact of the JEDEC standards. Moreover, the Director rejected Netlist's argument by instituting the 087 PGR. 801/802/901: Samsung further objects to EX2081 for lacking foundation and for containing hearsay. <i>See</i> 37 C.F.R. § 42.62(a); Fed. R. Evid. 801–04. For example, Netlist has neither authenticated this exhibit, nor laid the foundation for any hearsay exception.

<u>Exhibit</u>	<u>Objection(s)</u>
EX2082 – David Kennedy - Patent 100, Intellectual Asset Management	401-403: EX2082 is irrelevant, cumulative, misleading, or confusing, and its probative value, if any, is outweighed by prejudice. Netlist cites this exhibit only through the Kennedy Declaration, EX2061, ¶5, in connection with its argument that Samsung failed to address secondary considerations with respect to the JDLA and a license between Netlist and SK hynix, but the Kennedy Declaration is inadmissible as set forth above, and so is this exhibit cited therein. 801/802/901: Samsung further objects to EX2082 for lacking foundation and for containing hearsay. <i>See</i> 37 C.F.R. § 42.62(a); Fed. R. Evid. 801–04. For example, Netlist has neither authenticated this exhibit, nor laid the foundation for any hearsay exception.

<u>Exhibit</u>	<u>Objection(s)</u>
EX2084 – “What is DRAM?”, Lenovo	401-403: EX2084 is irrelevant, cumulative, misleading, or confusing, and its probative value, if any, is outweighed by prejudice. Netlist cites this exhibit only through the Kennedy Declaration, EX2061, ¶¶17–18, in connection with its argument that Samsung failed to address secondary considerations with respect to the JDLA and a license between Netlist and SK hynix, but the characteristics of DRAM lack relevancy to the license analysis in the context of secondary considerations. Also, the JDLA is the subject of a final judgment in district court and it is improper for Netlist to try to relitigate and collaterally attack that final judgment, and the mere fact that Samsung or SK hynix had a portfolio license agreement with Netlist is an insubstantial secondary consideration here (to the extent it is a secondary consideration and a large portfolio can establish nexus) given that Netlist contends it terminated the JDLA and given the lack of any evidence that the 087 Patent was a significant part of either of the portfolio licenses, especially in light of the impact of the JEDEC standards. Moreover, the Director rejected Netlist’s argument by instituting the 087 PGR. Also, as the Kennedy Declaration is inadmissible as set forth above, so is this exhibit cited therein. 801/802/901: Samsung further objects to EX2084 for lacking foundation and for containing hearsay. <i>See</i> 37 C.F.R. § 42.62(a); Fed. R. Evid. 801–04. For example, Netlist has neither authenticated this exhibit, nor laid the foundation for any hearsay exception.

<u>Exhibit</u>	<u>Objection(s)</u>
EX2085 – “Introduction to Memory Chips: DRAM, NAND & NOR Flash,” Heisener Electronics, January 23, 2026	401-403: EX2085 is irrelevant, cumulative, misleading, or confusing, and its probative value, if any, is outweighed by prejudice. Netlist cites this exhibit only through the Kennedy Declaration, EX2061, ¶18, in connection with its argument that Samsung failed to address secondary considerations with respect to the JDLA and a license between Netlist and SK hynix, but the characteristics of DRAM and NAND Flash lack relevancy to the license analysis in the context of secondary considerations. Also, the JDLA is the subject of a final judgment in district court and it is improper for Netlist to try to relitigate and collaterally attack that final judgment, and the mere fact that Samsung or SK hynix had a portfolio license agreement with Netlist is an insubstantial secondary consideration here (to the extent it is a secondary consideration and a large portfolio can establish nexus) given that Netlist contends it terminated the JDLA and given the lack of any evidence that the 087 Patent was a significant part of either of the portfolio licenses, especially in light of the impact of the JEDEC standards. Moreover, the Director rejected Netlist’s argument by instituting the 087 PGR. Also, as the Kennedy Declaration is inadmissible as set forth above, so is this exhibit cited therein. 801/802/901: Samsung further objects to EX2085 for lacking foundation and for containing hearsay. <i>See</i> 37 C.F.R. § 42.62(a); Fed. R. Evid. 801–04. For example, Netlist has neither authenticated this exhibit, nor laid the foundation for any hearsay exception.

<u>Exhibit</u>	<u>Objection(s)</u>
EX2086 – “Samsung,” Britannica Money, last updated May 26, 2026	401-403: EX2086 is irrelevant, cumulative, misleading, or confusing, and its probative value, if any, is outweighed by prejudice. Netlist cites this exhibit only through the Kennedy Declaration, EX2061, ¶19, in connection with its argument that Samsung failed to address secondary considerations with respect to the JDLA, but Samsung’s longtime presence in the semiconductor industry lacks relevancy to the license analysis in the context of secondary considerations. Also, the JDLA is the subject of a final judgment in district court and it is improper for Netlist to try to relitigate and collaterally attack that final judgment, and the mere fact that Samsung had a portfolio license agreement with Netlist is an insubstantial secondary consideration here (to the extent it is a secondary consideration and a large portfolio can establish nexus) given that Netlist contends it terminated the agreement and given the lack of any evidence that the 087 Patent was a significant part of the portfolio license, especially in light of the impact of the JEDEC standards. Moreover, the Director rejected Netlist’s argument by instituting the 087 PGR. Also, as the Kennedy Declaration is inadmissible as set forth above, so is this exhibit cited therein. 801/802/901: Samsung further objects to EX2086 for lacking foundation and for containing hearsay. <i>See</i> 37 C.F.R. § 42.62(a); Fed. R. Evid. 801–04. For example, Netlist has neither authenticated this exhibit, nor laid the foundation for any hearsay exception.

<u>Exhibit</u>	<u>Objection(s)</u>
EX2087 – Matei, M., “Samsung beats Intel in the semiconductor market for the first time in years,” SamMobile, April 14, 2022	401-403: EX2087 is irrelevant, cumulative, misleading, or confusing, and its probative value, if any, is outweighed by prejudice. Netlist cites this exhibit only through the Kennedy Declaration, EX2061, ¶19, in connection with its argument that Samsung failed to address secondary considerations with respect to the JDLA, but Samsung’s performance in the semiconductor industry in general lacks relevancy to the license analysis in the context of secondary considerations. Also, the JDLA is the subject of a final judgment in district court and it is improper for Netlist to try to relitigate and collaterally attack that final judgment, and the mere fact that Samsung had a portfolio license agreement with Netlist is an insubstantial secondary consideration here (to the extent it is a secondary consideration and a large portfolio can establish nexus) given that Netlist contends it terminated the agreement and given the lack of any evidence that the 087 Patent was a significant part of the portfolio license, especially in light of the impact of the JEDEC standards. Moreover, the Director rejected Netlist’s argument by instituting the 087 PGR. Also, as the Kennedy Declaration is inadmissible as set forth above, so is this exhibit cited therein. 801/802/901: Samsung further objects to EX2087 for lacking foundation and for containing hearsay. <i>See</i> 37 C.F.R. § 42.62(a); Fed. R. Evid. 801–04. For example, Netlist has neither authenticated this exhibit, nor laid the foundation for any hearsay exception.

<u>Exhibit</u>	<u>Objection(s)</u>
EX2088 – “Global DRAM Market Hits Record High,” BusinessKorea, May 27, 2026	401-403: EX2088 is irrelevant, cumulative, misleading, or confusing, and its probative value, if any, is outweighed by prejudice. Netlist cites this exhibit only through the Kennedy Declaration, EX2061, ¶19, in connection with its argument that Samsung failed to address secondary considerations with respect to the JDLA and a license between Netlist and SK hynix, but general DRAM market revenue data lacks relevancy to the license analysis in the context of secondary considerations. Also, the JDLA is the subject of a final judgment in district court and it is improper for Netlist to try to relitigate and collaterally attack that final judgment, and the mere fact that Samsung or SK hynix had a portfolio license agreement with Netlist is an insubstantial secondary consideration here (to the extent it is a secondary consideration and a large portfolio can establish nexus) given that Netlist contends it terminated the JDLA and given the lack of any evidence that the 087 Patent was a significant part of either of the portfolio licenses, especially in light of the impact of the JEDEC standards. Moreover, the Director rejected Netlist’s argument by instituting the 087 PGR. Also, as the Kennedy Declaration is inadmissible as set forth above, so is this exhibit cited therein. 801/802/901: Samsung further objects to EX2088 for lacking foundation and for containing hearsay. <i>See</i> 37 C.F.R. § 42.62(a); Fed. R. Evid. 801–04. For example, Netlist has neither authenticated this exhibit, nor laid the foundation for any hearsay exception.

<u>Exhibit</u>	<u>Objection(s)</u>
EX2090 – “Netlist’s (NLST) CEO Chuck Hong on Q4 2016 Results - Earnings Call Transcript,” Seeking Alpha, March 29, 2017	401-403: EX2090 is irrelevant, cumulative, misleading, or confusing, and its probative value, if any, is outweighed by prejudice. Netlist cites this exhibit only through the Kennedy Declaration, EX2061, ¶26, in connection with its argument that Samsung failed to address secondary considerations with respect to the JDLA, but Netlist’s earnings call statements lack relevancy to the license analysis in the context of secondary considerations. Also, the JDLA is the subject of a final judgment in district court and it is improper for Netlist to try to relitigate and collaterally attack that final judgment, and the mere fact that Samsung had a portfolio license agreement with Netlist is an insubstantial secondary consideration here (to the extent it is a secondary consideration and a large portfolio can establish nexus) given that Netlist contends it terminated the agreement and given the lack of any evidence that the 087 Patent was a significant part of the portfolio license, especially in light of the impact of the JEDEC standards. Moreover, the Director rejected Netlist’s argument by instituting the 087 PGR. Also, as the Kennedy Declaration is inadmissible as set forth above, so is this exhibit cited therein. 801/802/901: Samsung further objects to EX2086 for lacking foundation and for containing hearsay. <i>See</i> 37 C.F.R. § 42.62(a); Fed. R. Evid. 801–04. For example, Netlist has neither authenticated this exhibit, nor laid the foundation for any hearsay exception.

<u>Exhibit</u>	<u>Objection(s)</u>
EX2091 – “Netlist’s (NLST) CEO Chuck Hong on Q1 2017 Results - Earnings Call Transcript,” Seeking Alpha, May 16, 2017	401-403: EX2091 is irrelevant, cumulative, misleading, or confusing, and its probative value, if any, is outweighed by prejudice. Netlist cites this exhibit only through the Kennedy Declaration, EX2061, ¶26, in connection with its argument that Samsung failed to address secondary considerations with respect to the JDLA, but Netlist’s earnings call statements lack relevancy to the license analysis in the context of secondary considerations. Also, the JDLA is the subject of a final judgment in district court and it is improper for Netlist to try to relitigate and collaterally attack that final judgment, and the mere fact that Samsung had a portfolio license agreement with Netlist is an insubstantial secondary consideration here (to the extent it is a secondary consideration and a large portfolio can establish nexus) given that Netlist contends it terminated the agreement and given the lack of any evidence that the 087 Patent was a significant part of the portfolio license, especially in light of the impact of the JEDEC standards. Moreover, the Director rejected Netlist’s argument by instituting the 087 PGR. Also, as the Kennedy Declaration is inadmissible as set forth above, so is this exhibit cited therein. 801/802/901: Samsung further objects to EX2091 for lacking foundation and for containing hearsay. <i>See</i> 37 C.F.R. § 42.62(a); Fed. R. Evid. 801–04. For example, Netlist has neither authenticated this exhibit, nor laid the foundation for any hearsay exception.

<u>Exhibit</u>	<u>Objection(s)</u>
EX2092 – “Netlist’s (NLST) CEO Chuck Hong on Q2 2017 Results - Earnings Call Transcript,” Seeking Alpha, August 10, 2017	401-403: EX2092 is irrelevant, cumulative, misleading, or confusing, and its probative value, if any, is outweighed by prejudice. Netlist cites this exhibit only through the Kennedy Declaration, EX2061, ¶26, in connection with its argument that Samsung failed to address secondary considerations with respect to the JDLA, but Netlist’s earnings call statements lack relevancy to the license analysis in the context of secondary considerations. Also, the JDLA is the subject of a final judgment in district court and it is improper for Netlist to try to relitigate and collaterally attack that final judgment, and the mere fact that Samsung had a portfolio license agreement with Netlist is an insubstantial secondary consideration here (to the extent it is a secondary consideration and a large portfolio can establish nexus) given that Netlist contends it terminated the agreement and given the lack of any evidence that the 087 Patent was a significant part of the portfolio license, especially in light of the impact of the JEDEC standards. Moreover, the Director rejected Netlist’s argument by instituting the 087 PGR. Also, as the Kennedy Declaration is inadmissible as set forth above, so is this exhibit cited therein. 801/802/901: Samsung further objects to EX2092 for lacking foundation and for containing hearsay. <i>See</i> 37 C.F.R. § 42.62(a); Fed. R. Evid. 801–04. For example, Netlist has neither authenticated this exhibit, nor laid the foundation for any hearsay exception.

<u>Exhibit</u>	<u>Objection(s)</u>
EX2093 – Netlist Sales Data (HIGHLY CONFIDENTIAL – OUTSIDE COUNSEL EYES’ ONLY – PROTECTIVE ORDER MATERIAL)	401-403: EX2093 is irrelevant, cumulative, misleading, or confusing, and its probative value, if any, is outweighed by prejudice. Netlist cites this exhibit only through the Kennedy Declaration, EX2061, ¶27, in connection with its argument that Samsung failed to address secondary considerations with respect to the JDLA, but Netlist’s sales data lacks relevancy to the license analysis in the context of secondary considerations. Also, the JDLA is the subject of a final judgment in district court and it is improper for Netlist to try to relitigate and collaterally attack that final judgment, and the mere fact that Samsung had a portfolio license agreement with Netlist is an insubstantial secondary consideration here (to the extent it is a secondary consideration and a large portfolio can establish nexus) given that Netlist contends it terminated the agreement and given the lack of any evidence that the 087 Patent was a significant part of the portfolio license, especially in light of the impact of the JEDEC standards. Moreover, the Director rejected Netlist’s argument by instituting the 087 PGR. Also, as the Kennedy Declaration is inadmissible as set forth above, so is this exhibit cited therein. 801/802/901: Samsung further objects to EX2093 for lacking foundation and for containing hearsay. <i>See</i> 37 C.F.R. § 42.62(a); Fed. R. Evid. 801–04. For example, Netlist has neither authenticated this exhibit, nor laid the foundation for any hearsay exception.

<u>Exhibit</u>	<u>Objection(s)</u>
EX2094 – Email from Raymond Jiang to Neal Knuth, June 9, 2017 (CONFIDENTIAL – PROTECTIVE ORDER MATERIAL)	401-403: EX2094 is irrelevant, cumulative, misleading, or confusing, and its probative value, if any, is outweighed by prejudice. Netlist cites this exhibit only through the Kennedy Declaration, EX2061, ¶28, in connection with its argument that Samsung failed to address secondary considerations with respect to the JDLA, but this email about Netlist acknowledging the role of Samsung’s memory supply lacks relevancy to the license analysis in the context of secondary considerations. Also, the JDLA is the subject of a final judgment in district court and it is improper for Netlist to try to relitigate and collaterally attack that final judgment, and the mere fact that Samsung had a portfolio license agreement with Netlist is an insubstantial secondary consideration here (to the extent it is a secondary consideration and a large portfolio can establish nexus) given that Netlist contends it terminated the agreement and given the lack of any evidence that the 087 Patent was a significant part of the portfolio license, especially in light of the impact of the JEDEC standards. Moreover, the Director rejected Netlist’s argument by instituting the 087 PGR. Also, as the Kennedy Declaration is inadmissible as set forth above, so is this exhibit cited therein. 801/802/901: Samsung further objects to EX2094 for lacking foundation and for containing hearsay. <i>See</i> 37 C.F.R. § 42.62(a); Fed. R. Evid. 801–04. For example, Netlist has neither authenticated this exhibit, nor laid the foundation for any hearsay exception.

<u>Exhibit</u>	<u>Objection(s)</u>
EX2095 – “Gartner Says Worldwide Semiconductor Revenue Declined 11.9% in 2019,” Gartner Newsroom, January 14, 2020	401-403: EX2095 is irrelevant, cumulative, misleading, or confusing, and its probative value, if any, is outweighed by prejudice. Netlist cites this exhibit only through the Kennedy Declaration, EX2061, ¶31, in connection with its argument that Samsung failed to address secondary considerations with respect to the JDLA, but general semiconductor revenue decline data lacks relevancy to the license analysis in the context of secondary considerations. Also, the JDLA is the subject of a final judgment in district court and it is improper for Netlist to try to relitigate and collaterally attack that final judgment, and the mere fact that Samsung had a portfolio license agreement with Netlist is an insubstantial secondary consideration here (to the extent it is a secondary consideration and a large portfolio can establish nexus) given that Netlist contends it terminated the agreement and given the lack of any evidence that the 087 Patent was a significant part of the portfolio license, especially in light of the impact of the JEDEC standards. Moreover, the Director rejected Netlist’s argument by instituting the 087 PGR. Also, as the Kennedy Declaration is inadmissible as set forth above, so is this exhibit cited therein. 801/802/901: Samsung further objects to EX2095 for lacking foundation and for containing hearsay. <i>See</i> 37 C.F.R. § 42.62(a); Fed. R. Evid. 801–04. For example, Netlist has neither authenticated this exhibit, nor laid the foundation for any hearsay exception.

<u>Exhibit</u>	<u>Objection(s)</u>
EX2096 – “Global NAND Flash Revenue Fell by 24.3% QoQ for 3Q23,” TrendForce Press Center, November 23, 2022	401-403: EX2096 is irrelevant, cumulative, misleading, or confusing, and its probative value, if any, is outweighed by prejudice. Netlist cites this exhibit only through the Kennedy Declaration, EX2061, ¶31, in connection with its argument that Samsung failed to address secondary considerations with respect to the JDLA, but general NAND Flash revenue data lacks relevancy to the license analysis in the context of secondary considerations. Also, the JDLA is the subject of a final judgment in district court and it is improper for Netlist to try to relitigate and collaterally attack that final judgment, and the mere fact that Samsung had a portfolio license agreement with Netlist is an insubstantial secondary consideration here (to the extent it is a secondary consideration and a large portfolio can establish nexus) given that Netlist contends it terminated the agreement and given the lack of any evidence that the 087 Patent was a significant part of the portfolio license, especially in light of the impact of the JEDEC standards. Moreover, the Director rejected Netlist’s argument by instituting the 087 PGR. Also, as the Kennedy Declaration is inadmissible as set forth above, so is this exhibit cited therein. 801/802/901: Samsung further objects to EX2096 for lacking foundation and for containing hearsay. <i>See</i> 37 C.F.R. § 42.62(a); Fed. R. Evid. 801–04. For example, Netlist has neither authenticated this exhibit, nor laid the foundation for any hearsay exception.

<u>Exhibit</u>	<u>Objection(s)</u>
EX2097 – Shen, J., “Global DRAM sales to fall 18% in 2022, says IC Insights,” DigiTimes Asia, November 23, 2022	401-403: EX2097 is irrelevant, cumulative, misleading, or confusing, and its probative value, if any, is outweighed by prejudice. Netlist cites this exhibit only through the Kennedy Declaration, EX2061, ¶31, in connection with its argument that Samsung failed to address secondary considerations with respect to the JDLA, but general DRAM sales forecast data lacks relevancy to the license analysis in the context of secondary considerations. Also, the JDLA is the subject of a final judgment in district court and it is improper for Netlist to try to relitigate and collaterally attack that final judgment, and the mere fact that Samsung had a portfolio license agreement with Netlist is an insubstantial secondary consideration here (to the extent it is a secondary consideration and a large portfolio can establish nexus) given that Netlist contends it terminated the agreement and given the lack of any evidence that the 087 Patent was a significant part of the portfolio license, especially in light of the impact of the JEDEC standards. Moreover, the Director rejected Netlist’s argument by instituting the 087 PGR. Also, as the Kennedy Declaration is inadmissible as set forth above, so is this exhibit cited therein. 801/802/901: Samsung further objects to EX2097 for lacking foundation and for containing hearsay. <i>See</i> 37 C.F.R. § 42.62(a); Fed. R. Evid. 801–04. For example, Netlist has neither authenticated this exhibit, nor laid the foundation for any hearsay exception.

<u>Exhibit</u>	<u>Objection(s)</u>
EX2098 – Micron Investor Day 2022 Presentation, May 12, 2022	401-403: EX2098 is irrelevant, cumulative, misleading, or confusing, and its probative value, if any, is outweighed by prejudice. Netlist cites this exhibit only through the Kennedy Declaration, EX2061, ¶32, in connection with its argument that Samsung failed to address secondary considerations with respect to the JDLA, but a third party’s investor presentation lacks relevancy to the license analysis in the context of secondary considerations. Also, the JDLA is the subject of a final judgment in district court and it is improper for Netlist to try to relitigate and collaterally attack that final judgment, and the mere fact that Samsung had a portfolio license agreement with Netlist is an insubstantial secondary consideration here (to the extent it is a secondary consideration and a large portfolio can establish nexus) given that Netlist contends it terminated the agreement and given the lack of any evidence that the 087 Patent was a significant part of the portfolio license, especially in light of the impact of the JEDEC standards. Moreover, the Director rejected Netlist’s argument by instituting the 087 PGR. Also, as the Kennedy Declaration is inadmissible as set forth above, so is this exhibit cited therein. 801/802/901: Samsung further objects to EX2098 for lacking foundation and for containing hearsay. <i>See</i> 37 C.F.R. § 42.62(a); Fed. R. Evid. 801–04. For example, Netlist has neither authenticated this exhibit, nor laid the foundation for any hearsay exception.

<u>Exhibit</u>	<u>Objection(s)</u>
EX2099 – “DRAM Market Anticipated to Surpass USD 221.67 Billion by 2030,” GlobeNewswire, May 9, 2022	401-403: EX2099 is irrelevant, cumulative, misleading, or confusing, and its probative value, if any, is outweighed by prejudice. Netlist cites this exhibit only through the Kennedy Declaration, EX2061, ¶32, in connection with its argument that Samsung failed to address secondary considerations with respect to the JDLA, but general DRAM market projections lack relevancy to the license analysis in the context of secondary considerations. Also, the JDLA is the subject of a final judgment in district court and it is improper for Netlist to try to relitigate and collaterally attack that final judgment, and the mere fact that Samsung had a portfolio license agreement with Netlist is an insubstantial secondary consideration here (to the extent it is a secondary consideration and a large portfolio can establish nexus) given that Netlist contends it terminated the agreement and given the lack of any evidence that the 087 Patent was a significant part of the portfolio license, especially in light of the impact of the JEDEC standards. Moreover, the Director rejected Netlist’s argument by instituting the 087 PGR. Also, as the Kennedy Declaration is inadmissible as set forth above, so is this exhibit cited therein. 801/802/901: Samsung further objects to EX2099 for lacking foundation and for containing hearsay. <i>See</i> 37 C.F.R. § 42.62(a); Fed. R. Evid. 801–04. For example, Netlist has neither authenticated this exhibit, nor laid the foundation for any hearsay exception.

<u>Exhibit</u>	<u>Objection(s)</u>
EX2100 – “3D NAND Flash Memory Market is Projected to Reach \$78.42 Billion by 2030,” Allied Market Research, 2022	401-403: EX2100 is irrelevant, cumulative, misleading, or confusing, and its probative value, if any, is outweighed by prejudice. Netlist cites this exhibit only through the Kennedy Declaration, EX2061, ¶32, in connection with its argument that Samsung failed to address secondary considerations with respect to the JDLA, but general NAND Flash market projections lack relevancy to the license analysis in the context of secondary considerations. Also, the JDLA is the subject of a final judgment in district court and it is improper for Netlist to try to relitigate and collaterally attack that final judgment, and the mere fact that Samsung had a portfolio license agreement with Netlist is an insubstantial secondary consideration here (to the extent it is a secondary consideration and a large portfolio can establish nexus) given that Netlist contends it terminated the agreement and given the lack of any evidence that the 087 Patent was a significant part of the portfolio license, especially in light of the impact of the JEDEC standards. Moreover, the Director rejected Netlist’s argument by instituting the 087 PGR. Also, as the Kennedy Declaration is inadmissible as set forth above, so is this exhibit cited therein. 801/802/901: Samsung further objects to EX2100 for lacking foundation and for containing hearsay. <i>See</i> 37 C.F.R. § 42.62(a); Fed. R. Evid. 801–04. For example, Netlist has neither authenticated this exhibit, nor laid the foundation for any hearsay exception.

<u>Exhibit</u>	<u>Objection(s)</u>
EX2101 – Coughlin, T., “Digital Storage And Memory Projections For 2026, Part 2,” Forbes	401-403: EX2101 is irrelevant, cumulative, misleading, or confusing, and its probative value, if any, is outweighed by prejudice. Netlist cites this exhibit only through the Kennedy Declaration, EX2061, ¶32, in connection with its argument that Samsung failed to address secondary considerations with respect to the JDLA, but general memory market projections lack relevancy to the license analysis in the context of secondary considerations. Also, the JDLA is the subject of a final judgment in district court and it is improper for Netlist to try to relitigate and collaterally attack that final judgment, and the mere fact that Samsung had a portfolio license agreement with Netlist is an insubstantial secondary consideration here (to the extent it is a secondary consideration and a large portfolio can establish nexus) given that Netlist contends it terminated the agreement and given the lack of any evidence that the 087 Patent was a significant part of the portfolio license, especially in light of the impact of the JEDEC standards. Moreover, the Director rejected Netlist’s argument by instituting the 087 PGR. Also, as the Kennedy Declaration is inadmissible as set forth above, so is this exhibit cited therein. 801/802/901: Samsung further objects to EX2101 for lacking foundation and for containing hearsay. <i>See</i> 37 C.F.R. § 42.62(a); Fed. R. Evid. 801–04. For example, Netlist has neither authenticated this exhibit, nor laid the foundation for any hearsay exception.

<u>Exhibit</u>	<u>Objection(s)</u>
EX2102 – “Gartner Forecasts Worldwide Semiconductor Revenue to Exceed \$1.3 Trillion in 2026,” Gartner Newsroom, April 8, 2026	401-403: EX2102 is irrelevant, cumulative, misleading, or confusing, and its probative value, if any, is outweighed by prejudice. Netlist cites this exhibit only through the Kennedy Declaration, EX2061, ¶¶32, 43, in connection with its argument that Samsung failed to address secondary considerations with respect to the JDLA, but general semiconductor revenue forecasts lack relevancy to the license analysis in the context of secondary considerations. Also, the JDLA is the subject of a final judgment in district court and it is improper for Netlist to try to relitigate and collaterally attack that final judgment, and the mere fact that Samsung had a portfolio license agreement with Netlist is an insubstantial secondary consideration here (to the extent it is a secondary consideration and a large portfolio can establish nexus) given that Netlist contends it terminated the agreement and given the lack of any evidence that the 087 Patent was a significant part of the portfolio license, especially in light of the impact of the JEDEC standards. Moreover, the Director rejected Netlist’s argument by instituting the 087 PGR. Also, as the Kennedy Declaration is inadmissible as set forth above, so is this exhibit cited therein. 801/802/901: Samsung further objects to EX2102 for lacking foundation and for containing hearsay. <i>See</i> 37 C.F.R. § 42.62(a); Fed. R. Evid. 801–04. For example, Netlist has neither authenticated this exhibit, nor laid the foundation for any hearsay exception.

<u>Exhibit</u>	<u>Objection(s)</u>
EX2103 – “NAND Flash Memory and DRAM Market Size, Share, Growth, and Industry Analysis,” Industry Research	401-403: EX2103 is irrelevant, cumulative, misleading, or confusing, and its probative value, if any, is outweighed by prejudice. Netlist cites this exhibit only through the Kennedy Declaration, EX2061, ¶32, in connection with its argument that Samsung failed to address secondary considerations with respect to the JDLA, but general NAND and DRAM market size data lacks relevancy to the license analysis in the context of secondary considerations. Also, the JDLA is the subject of a final judgment in district court and it is improper for Netlist to try to relitigate and collaterally attack that final judgment, and the mere fact that Samsung had a portfolio license agreement with Netlist is an insubstantial secondary consideration here (to the extent it is a secondary consideration and a large portfolio can establish nexus) given that Netlist contends it terminated the agreement and given the lack of any evidence that the 087 Patent was a significant part of the portfolio license, especially in light of the impact of the JEDEC standards. Moreover, the Director rejected Netlist’s argument by instituting the 087 PGR. Also, as the Kennedy Declaration is inadmissible as set forth above, so is this exhibit cited therein. 801/802/901: Samsung further objects to EX2103 for lacking foundation and for containing hearsay. <i>See</i> 37 C.F.R. § 42.62(a); Fed. R. Evid. 801–04. For example, Netlist has neither authenticated this exhibit, nor laid the foundation for any hearsay exception.

<u>Exhibit</u>	<u>Objection(s)</u>
EX2104 – “Understanding Incremental Cost: Definition, Calculation & Business Impact,” Investopedia, last updated May 20, 2026	401-403: EX2104 is irrelevant, cumulative, misleading, or confusing, and its probative value, if any, is outweighed by prejudice. Netlist cites this exhibit only through the Kennedy Declaration, EX2061, ¶34, in connection with its argument that Samsung failed to address secondary considerations with respect to the JDLA, but a general article explaining incremental cost lacks relevancy to the license analysis in the context of secondary considerations. Also, the JDLA is the subject of a final judgment in district court and it is improper for Netlist to try to relitigate and collaterally attack that final judgment, and the mere fact that Samsung had a portfolio license agreement with Netlist is an insubstantial secondary consideration here (to the extent it is a secondary consideration and a large portfolio can establish nexus) given that Netlist contends it terminated the agreement and given the lack of any evidence that the 087 Patent was a significant part of the portfolio license, especially in light of the impact of the JEDEC standards. Moreover, the Director rejected Netlist’s argument by instituting the 087 PGR. Also, as the Kennedy Declaration is inadmissible as set forth above, so is this exhibit cited therein. 801/802/901: Samsung further objects to EX2104 for lacking foundation and for containing hearsay. <i>See</i> 37 C.F.R. § 42.62(a); Fed. R. Evid. 801–04. For example, Netlist has neither authenticated this exhibit, nor laid the foundation for any hearsay exception.

<u>Exhibit</u>	<u>Objection(s)</u>
EX2105 – “Working capital: What is it and why is it important?,” Bank of America, March 6, 2025	401-403: EX2105 is irrelevant, cumulative, misleading, or confusing, and its probative value, if any, is outweighed by prejudice. Netlist cites this exhibit only through the Kennedy Declaration, EX2061, ¶37, in connection with its argument that Samsung failed to address secondary considerations with respect to the JDLA, but a general article explaining working capital lacks relevancy to the license analysis in the context of secondary considerations. Also, the JDLA is the subject of a final judgment in district court and it is improper for Netlist to try to relitigate and collaterally attack that final judgment, and the mere fact that Samsung had a portfolio license agreement with Netlist is an insubstantial secondary consideration here (to the extent it is a secondary consideration and a large portfolio can establish nexus) given that Netlist contends it terminated the agreement and given the lack of any evidence that the 087 Patent was a significant part of the portfolio license, especially in light of the impact of the JEDEC standards. Moreover, the Director rejected Netlist’s argument by instituting the 087 PGR. Also, as the Kennedy Declaration is inadmissible as set forth above, so is this exhibit cited therein. 801/802/901: Samsung further objects to EX2105 for lacking foundation and for containing hearsay. <i>See</i> 37 C.F.R. § 42.62(a); Fed. R. Evid. 801–04. For example, Netlist has neither authenticated this exhibit, nor laid the foundation for any hearsay exception.

<u>Exhibit</u>	<u>Objection(s)</u>
EX2106 – Fernando, J., “Working Capital: Formula, Components, and Limitations,” Investopedia, last updated February 21, 2026	401-403: EX2106 is irrelevant, cumulative, misleading, or confusing, and its probative value, if any, is outweighed by prejudice. Netlist cites this exhibit only through the Kennedy Declaration, EX2061, ¶37, in connection with its argument that Samsung failed to address secondary considerations with respect to the JDLA, but a general article explaining working capital lacks relevancy to the license analysis in the context of secondary considerations. Also, the JDLA is the subject of a final judgment in district court and it is improper for Netlist to try to relitigate and collaterally attack that final judgment, and the mere fact that Samsung had a portfolio license agreement with Netlist is an insubstantial secondary consideration here (to the extent it is a secondary consideration and a large portfolio can establish nexus) given that Netlist contends it terminated the agreement and given the lack of any evidence that the 087 Patent was a significant part of the portfolio license, especially in light of the impact of the JEDEC standards. Moreover, the Director rejected Netlist’s argument by instituting the 087 PGR. Also, as the Kennedy Declaration is inadmissible as set forth above, so is this exhibit cited therein. 801/802/901: Samsung further objects to EX2106 for lacking foundation and for containing hearsay. <i>See</i> 37 C.F.R. § 42.62(a); Fed. R. Evid. 801–04. For example, Netlist has neither authenticated this exhibit, nor laid the foundation for any hearsay exception.

<u>Exhibit</u>	<u>Objection(s)</u>
EX2107 – Netlist, Inc. Form 10-K for the Fiscal Year Ended December 29, 2018	401-403: EX2107 is irrelevant, cumulative, misleading, or confusing, and its probative value, if any, is outweighed by prejudice. Netlist cites this exhibit only through the Kennedy Declaration, EX2061, ¶39, in connection with its argument that Samsung failed to address secondary considerations with respect to the JDLA, but Netlist’s general financial information lacks relevancy to the license analysis in the context of secondary considerations. Also, the JDLA is the subject of a final judgment in district court and it is improper for Netlist to try to relitigate and collaterally attack that final judgment, and the mere fact that Samsung had a portfolio license agreement with Netlist is an insubstantial secondary consideration here (to the extent it is a secondary consideration and a large portfolio can establish nexus) given that Netlist contends it terminated the agreement and given the lack of any evidence that the 087 Patent was a significant part of the portfolio license, especially in light of the impact of the JEDEC standards. Moreover, the Director rejected Netlist’s argument by instituting the 087 PGR. Also, as the Kennedy Declaration is inadmissible as set forth above, so is this exhibit cited therein. 801/802/901: Samsung further objects to EX2107 for lacking foundation and for containing hearsay. <i>See</i> 37 C.F.R. § 42.62(a); Fed. R. Evid. 801–04. For example, Netlist has neither authenticated this exhibit, nor laid the foundation for any hearsay exception.

<u>Exhibit</u>	<u>Objection(s)</u>
EX2108 – Netlist, Inc. Form 10-K for the Fiscal Year Ended December 28, 2019	401-403: EX2108 is irrelevant, cumulative, misleading, or confusing, and its probative value, if any, is outweighed by prejudice. Netlist cites this exhibit only through the Kennedy Declaration, EX2061, ¶39, in connection with its argument that Samsung failed to address secondary considerations with respect to the JDLA, but Netlist’s general financial information lacks relevancy to the license analysis in the context of secondary considerations. Also, the JDLA is the subject of a final judgment in district court and it is improper for Netlist to try to relitigate and collaterally attack that final judgment, and the mere fact that Samsung had a portfolio license agreement with Netlist is an insubstantial secondary consideration here (to the extent it is a secondary consideration and a large portfolio can establish nexus) given that Netlist contends it terminated the agreement and given the lack of any evidence that the 087 Patent was a significant part of the portfolio license, especially in light of the impact of the JEDEC standards. Moreover, the Director rejected Netlist’s argument by instituting the 087 PGR. Also, as the Kennedy Declaration is inadmissible as set forth above, so is this exhibit cited therein. 801/802/901: Samsung further objects to EX2108 for lacking foundation and for containing hearsay. <i>See</i> 37 C.F.R. § 42.62(a); Fed. R. Evid. 801–04. For example, Netlist has neither authenticated this exhibit, nor laid the foundation for any hearsay exception.

<u>Exhibit</u>	<u>Objection(s)</u>
EX2109 – Netlist, Inc. Form 10-K for the Fiscal Year Ended January 1, 2022	401-403: EX2109 is irrelevant, cumulative, misleading, or confusing, and its probative value, if any, is outweighed by prejudice. Netlist cites this exhibit only through the Kennedy Declaration, EX2061, ¶39, in connection with its argument that Samsung failed to address secondary considerations with respect to the JDLA, but Netlist’s general financial information lacks relevancy to the license analysis in the context of secondary considerations. Also, the JDLA is the subject of a final judgment in district court and it is improper for Netlist to try to relitigate and collaterally attack that final judgment, and the mere fact that Samsung had a portfolio license agreement with Netlist is an insubstantial secondary consideration here (to the extent it is a secondary consideration and a large portfolio can establish nexus) given that Netlist contends it terminated the agreement and given the lack of any evidence that the 087 Patent was a significant part of the portfolio license, especially in light of the impact of the JEDEC standards. Moreover, the Director rejected Netlist’s argument by instituting the 087 PGR. Also, as the Kennedy Declaration is inadmissible as set forth above, so is this exhibit cited therein. 801/802/901: Samsung further objects to EX2109 for lacking foundation and for containing hearsay. <i>See</i> 37 C.F.R. § 42.62(a); Fed. R. Evid. 801–04. For example, Netlist has neither authenticated this exhibit, nor laid the foundation for any hearsay exception.

<u>Exhibit</u>	<u>Objection(s)</u>
EX2110 – Lee, S., “As iPhone 8 looms, firms scramble to lock up memory chip supply,” Reuters, June 20, 2017	401-403: EX2110 is irrelevant, cumulative, misleading, or confusing, and its probative value, if any, is outweighed by prejudice. Netlist cites this exhibit only through the Kennedy Declaration, EX2061, ¶43, in connection with its argument that Samsung failed to address secondary considerations with respect to the JDLA, but a general news article about memory chip supply constraints lacks relevancy to the license analysis in the context of secondary considerations. Also, the JDLA is the subject of a final judgment in district court and it is improper for Netlist to try to relitigate and collaterally attack that final judgment, and the mere fact that Samsung had a portfolio license agreement with Netlist is an insubstantial secondary consideration here (to the extent it is a secondary consideration and a large portfolio can establish nexus) given that Netlist contends it terminated the agreement and given the lack of any evidence that the 087 Patent was a significant part of the portfolio license, especially in light of the impact of the JEDEC standards. Moreover, the Director rejected Netlist’s argument by instituting the 087 PGR. Also, as the Kennedy Declaration is inadmissible as set forth above, so is this exhibit cited therein. 801/802/901: Samsung further objects to EX2110 for lacking foundation and for containing hearsay. <i>See</i> 37 C.F.R. § 42.62(a); Fed. R. Evid. 801–04. For example, Netlist has neither authenticated this exhibit, nor laid the foundation for any hearsay exception.

<u>Exhibit</u>	<u>Objection(s)</u>
EX2111 – “3Q16 Quarterly Earnings,” Samsung, October 27, 2016	401-403: EX2111 is irrelevant, cumulative, misleading, or confusing, and its probative value, if any, is outweighed by prejudice. Netlist cites this exhibit only through the Kennedy Declaration, EX2061, ¶43, in connection with its argument that Samsung failed to address secondary considerations with respect to the JDLA, but Samsung SDI’s general quarterly earnings data lacks relevancy to the license analysis in the context of secondary considerations. Also, the JDLA is the subject of a final judgment in district court and it is improper for Netlist to try to relitigate and collaterally attack that final judgment, and the mere fact that Samsung had a portfolio license agreement with Netlist is an insubstantial secondary consideration here (to the extent it is a secondary consideration and a large portfolio can establish nexus) given that Netlist contends it terminated the agreement and given the lack of any evidence that the 087 Patent was a significant part of the portfolio license, especially in light of the impact of the JEDEC standards. Moreover, the Director rejected Netlist’s argument by instituting the 087 PGR. Also, as the Kennedy Declaration is inadmissible as set forth above, so is this exhibit cited therein. 801/802/901: Samsung further objects to EX2111 for lacking foundation and for containing hearsay. <i>See</i> 37 C.F.R. § 42.62(a); Fed. R. Evid. 801–04. For example, Netlist has neither authenticated this exhibit, nor laid the foundation for any hearsay exception.

<u>Exhibit</u>	<u>Objection(s)</u>
EX2112 – Netlist, Inc. Form 10-K for the Fiscal Year Ended December 27, 2014	401-403: EX2112 is irrelevant, cumulative, misleading, or confusing, and its probative value, if any, is outweighed by prejudice. Netlist cites this exhibit only through the Kennedy Declaration, EX2061, Appendix C, in connection with its argument that Samsung failed to address secondary considerations with respect to the JDLA, but Netlist’s general financial information lacks relevancy to the license analysis in the context of secondary considerations. Also, the JDLA is the subject of a final judgment in district court and it is improper for Netlist to try to relitigate and collaterally attack that final judgment, and the mere fact that Samsung had a portfolio license agreement with Netlist is an insubstantial secondary consideration here (to the extent it is a secondary consideration and a large portfolio can establish nexus) given that Netlist contends it terminated the agreement and given the lack of any evidence that the 087 Patent was a significant part of the portfolio license, especially in light of the impact of the JEDEC standards. Moreover, the Director rejected Netlist’s argument by instituting the 087 PGR. Also, as the Kennedy Declaration is inadmissible as set forth above, so is this exhibit cited therein. 801/802/901: Samsung further objects to EX2112 for lacking foundation and for containing hearsay. <i>See</i> 37 C.F.R. § 42.62(a); Fed. R. Evid. 801–04. For example, Netlist has neither authenticated this exhibit, nor laid the foundation for any hearsay exception.

<u>Exhibit</u>	<u>Objection(s)</u>
EX2113 – Netlist, Inc. Form 8-K, April 5, 2021	401-403: EX2113 is irrelevant, cumulative, misleading, or confusing, and its probative value, if any, is outweighed by prejudice. Netlist cites this exhibit in connection with its argument that Samsung failed to address secondary considerations with respect to a license between Netlist and SK hynix, Paper No. 31, 85–86, but Netlist’s general financial information lacks relevancy to the license analysis in the context of secondary considerations. Also, the mere fact that SK hynix may have had a portfolio license agreement with Netlist is an insubstantial secondary consideration here (to the extent it is a secondary consideration and a large portfolio can establish nexus) given the lack of any evidence that the 087 Patent was a significant part of the portfolio license, especially in light of the impact of the JEDEC standards. Moreover, the Director rejected Netlist’s argument by instituting the 087 PGR. 801/802/901: Samsung further objects to EX2113 for lacking foundation and for containing hearsay. <i>See</i> 37 C.F.R. § 42.62(a); Fed. R. Evid. 801–04. For example, Netlist has neither authenticated this exhibit, nor laid the foundation for any hearsay exception.

<u>Exhibit</u>	<u>Objection(s)</u>
EX2114 – Netlist Form 10-Q for the Quarterly Period Ended April 2, 2022	401-403: EX2114 is irrelevant, cumulative, misleading, or confusing, and its probative value, if any, is outweighed by prejudice. Netlist cites this exhibit only through the Kennedy Declaration, EX2061, ¶48, in connection with its argument that Samsung failed to address secondary considerations with respect to a license between Netlist and SK hynix, but Netlist’s general financial information lacks relevancy to the license analysis in the context of secondary considerations. Also, the mere fact that SK hynix may have had a portfolio license agreement with Netlist is an insubstantial secondary consideration here (to the extent it is a secondary consideration and a large portfolio can establish nexus) given the lack of any evidence that the 087 Patent was a significant part of the portfolio license, especially in light of the impact of the JEDEC standards. Moreover, the Director rejected Netlist’s argument by instituting the 087 PGR. Also, as the Kennedy Declaration is inadmissible as set forth above, so is this exhibit cited therein. 801/802/901: Samsung further objects to EX2114 for lacking foundation and for containing hearsay. <i>See</i> 37 C.F.R. § 42.62(a); Fed. R. Evid. 801–04. For example, Netlist has neither authenticated this exhibit, nor laid the foundation for any hearsay exception.

<u>Exhibit</u>	<u>Objection(s)</u>
EX2115 – Netlist Form 10-Q for the Quarterly Period Ended October 1, 2022	401-403: EX2115 is irrelevant, cumulative, misleading, or confusing, and its probative value, if any, is outweighed by prejudice. Netlist cites this exhibit only through the Kennedy Declaration, EX2061, ¶48, in connection with its argument that Samsung failed to address secondary considerations with respect to a license between Netlist and SK hynix, but Netlist’s general financial information lacks relevancy to the license analysis in the context of secondary considerations. Also, the mere fact that SK hynix may have had a portfolio license agreement with Netlist is an insubstantial secondary consideration here (to the extent it is a secondary consideration and a large portfolio can establish nexus) given the lack of any evidence that the 087 Patent was a significant part of the portfolio license, especially in light of the impact of the JEDEC standards. Moreover, the Director rejected Netlist’s argument by instituting the 087 PGR. Also, as the Kennedy Declaration is inadmissible as set forth above, so is this exhibit cited therein. 801/802/901: Samsung further objects to EX2115 for lacking foundation and for containing hearsay. <i>See</i> 37 C.F.R. § 42.62(a); Fed. R. Evid. 801–04. For example, Netlist has neither authenticated this exhibit, nor laid the foundation for any hearsay exception.

<u>Exhibit</u>	<u>Objection(s)</u>
EX2116 – Netlist, Inc. Report, Roth Capital Partners, April 8, 2021	401-403: EX2116 is irrelevant, cumulative, misleading, or confusing, and its probative value, if any, is outweighed by prejudice. Netlist cites this exhibit only through the Kennedy Declaration, EX2061, ¶47, in connection with its argument that Samsung failed to address secondary considerations with respect to a license between Netlist and SK hynix, but a third-party analyst’s commentary on the SK hynix license/supply agreement lacks relevancy to the license analysis in the context of secondary considerations. Also, the mere fact that SK hynix may have had a portfolio license agreement with Netlist is an insubstantial secondary consideration here (to the extent it is a secondary consideration and a large portfolio can establish nexus) given the lack of any evidence that the 087 Patent was a significant part of the portfolio license, especially in light of the impact of the JEDEC standards. Moreover, the Director rejected Netlist’s argument by instituting the 087 PGR. Also, as the Kennedy Declaration is inadmissible as set forth above, so is this exhibit cited therein. 801/802/901: Samsung further objects to EX2116 for lacking foundation and for containing hearsay. <i>See</i> 37 C.F.R. § 42.62(a); Fed. R. Evid. 801–04. For example, Netlist has neither authenticated this exhibit, nor laid the foundation for any hearsay exception.

<u>Exhibit</u>	<u>Objection(s)</u>
EX2117 – Netlist, Inc. Report, Craig-Hallum Capital Group LLC, April 8, 2021	401-403: EX2117 is irrelevant, cumulative, misleading, or confusing, and its probative value, if any, is outweighed by prejudice. Netlist cites this exhibit only through the Kennedy Declaration, EX2061, ¶47, in connection with its argument that Samsung failed to address secondary considerations with respect to a license between Netlist and SK hynix, but a third-party analyst’s commentary on the SK hynix license/supply agreement lacks relevancy to the license analysis in the context of secondary considerations. Also, the mere fact that SK hynix may have had a portfolio license agreement with Netlist is an insubstantial secondary consideration here (to the extent it is a secondary consideration and a large portfolio can establish nexus) given the lack of any evidence that the 087 Patent was a significant part of the portfolio license, especially in light of the impact of the JEDEC standards. Moreover, the Director rejected Netlist’s argument by instituting the 087 PGR. Also, as the Kennedy Declaration is inadmissible as set forth above, so is this exhibit cited therein. 801/802/901: Samsung further objects to EX2117 for lacking foundation and for containing hearsay. <i>See</i> 37 C.F.R. § 42.62(a); Fed. R. Evid. 801–04. For example, Netlist has neither authenticated this exhibit, nor laid the foundation for any hearsay exception.

<u>Exhibit</u>	<u>Objection(s)</u>
EX2118 – Netlist, Inc. Form 10-K for the Fiscal Year Ended January 2, 2016	401-403: EX2118 is irrelevant, cumulative, misleading, or confusing, and its probative value, if any, is outweighed by prejudice. Netlist cites this exhibit only through the Kennedy Declaration, EX2061, Appendix C, in connection with its argument that Samsung failed to address secondary considerations with respect to the JDLA, but Netlist’s general financial information lacks relevancy to the license analysis in the context of secondary considerations. Also, the JDLA is the subject of a final judgment in district court and it is improper for Netlist to try to relitigate and collaterally attack that final judgment, and the mere fact that Samsung had a portfolio license agreement with Netlist is an insubstantial secondary consideration here (to the extent it is a secondary consideration and a large portfolio can establish nexus) given that Netlist contends it terminated the agreement and given the lack of any evidence that the 087 Patent was a significant part of the portfolio license, especially in light of the impact of the JEDEC standards. Moreover, the Director rejected Netlist’s argument by instituting the 087 PGR. Also, as the Kennedy Declaration is inadmissible as set forth above, so is this exhibit cited therein. 801/802/901: Samsung further objects to EX2118 for lacking foundation and for containing hearsay. <i>See</i> 37 C.F.R. § 42.62(a); Fed. R. Evid. 801–04. For example, Netlist has neither authenticated this exhibit, nor laid the foundation for any hearsay exception.

<u>Exhibit</u>	<u>Objection(s)</u>
EX2119 – Netlist, Inc. Form 10-K for the Fiscal Year Ended December 31, 2016	401-403: EX2119 is irrelevant, cumulative, misleading, or confusing, and its probative value, if any, is outweighed by prejudice. Netlist cites this exhibit only through the Kennedy Declaration, EX2061, Appendix C, in connection with its argument that Samsung failed to address secondary considerations with respect to the JDLA, but Netlist’s general financial information lacks relevancy to the license analysis in the context of secondary considerations. Also, the JDLA is the subject of a final judgment in district court and it is improper for Netlist to try to relitigate and collaterally attack that final judgment, and the mere fact that Samsung had a portfolio license agreement with Netlist is an insubstantial secondary consideration here (to the extent it is a secondary consideration and a large portfolio can establish nexus) given that Netlist contends it terminated the agreement and given the lack of any evidence that the 087 Patent was a significant part of the portfolio license, especially in light of the impact of the JEDEC standards. Moreover, the Director rejected Netlist’s argument by instituting the 087 PGR. Also, as the Kennedy Declaration is inadmissible as set forth above, so is this exhibit cited therein. 801/802/901: Samsung further objects to EX2119 for lacking foundation and for containing hearsay. <i>See</i> 37 C.F.R. § 42.62(a); Fed. R. Evid. 801–04. For example, Netlist has neither authenticated this exhibit, nor laid the foundation for any hearsay exception.

<u>Exhibit</u>	<u>Objection(s)</u>
EX2120 – Netlist, Inc. Form 10-K for the Fiscal Year Ended December 30, 2017	401-403: EX2120 is irrelevant, cumulative, misleading, or confusing, and its probative value, if any, is outweighed by prejudice. Netlist cites this exhibit only through the Kennedy Declaration, EX2061, Appendix C, in connection with its argument that Samsung failed to address secondary considerations with respect to the JDLA, but Netlist’s general financial information lacks relevancy to the license analysis in the context of secondary considerations. Also, the JDLA is the subject of a final judgment in district court and it is improper for Netlist to try to relitigate and collaterally attack that final judgment, and the mere fact that Samsung had a portfolio license agreement with Netlist is an insubstantial secondary consideration here (to the extent it is a secondary consideration and a large portfolio can establish nexus) given that Netlist contends it terminated the agreement and given the lack of any evidence that the 087 Patent was a significant part of the portfolio license, especially in light of the impact of the JEDEC standards. Moreover, the Director rejected Netlist’s argument by instituting the 087 PGR. Also, as the Kennedy Declaration is inadmissible as set forth above, so is this exhibit cited therein. 801/802/901: Samsung further objects to EX2120 for lacking foundation and for containing hearsay. <i>See</i> 37 C.F.R. § 42.62(a); Fed. R. Evid. 801–04. For example, Netlist has neither authenticated this exhibit, nor laid the foundation for any hearsay exception.

<u>Exhibit</u>	<u>Objection(s)</u>
EX2121 – Netlist Form 10-Q for the Quarterly Period Ended October 1, 2022	401-403: EX2121 is irrelevant, cumulative, misleading, or confusing, and its probative value, if any, is outweighed by prejudice. Netlist cites this exhibit only through the Kennedy Declaration, EX2061, Appendix C, in connection with its argument that Samsung failed to address secondary considerations with respect to the JDLA, but Netlist’s general financial information lacks relevancy to the license analysis in the context of secondary considerations. Also, the JDLA is the subject of a final judgment in district court and it is improper for Netlist to try to relitigate and collaterally attack that final judgment, and the mere fact that Samsung had a portfolio license agreement with Netlist is an insubstantial secondary consideration here (to the extent it is a secondary consideration and a large portfolio can establish nexus) given that Netlist contends it terminated the agreement and given the lack of any evidence that the 087 Patent was a significant part of the portfolio license, especially in light of the impact of the JEDEC standards. Moreover, the Director rejected Netlist’s argument by instituting the 087 PGR. Also, as the Kennedy Declaration is inadmissible as set forth above, so is this exhibit cited therein. 801/802/901: Samsung further objects to EX2121 for lacking foundation and for containing hearsay. <i>See</i> 37 C.F.R. § 42.62(a); Fed. R. Evid. 801–04. For example, Netlist has neither authenticated this exhibit, nor laid the foundation for any hearsay exception.
EX2122 – U.S. Patent No. 8,497,712 to Nguyen et al., issued July 30, 2013	401-403, 37 C.F.R. § 42.6(a)(3): EX2122 is irrelevant, cumulative, misleading, or confusing, and its probative value, if any, is outweighed by prejudice. EX2122 was not cited in POR or other exhibits. 801/802: Samsung further objects to EX2122 for containing hearsay. <i>See</i> 37 C.F.R. § 42.62(a); Fed. R. Evid. 801–04.

<u>Exhibit</u>	<u>Objection(s)</u>
EX2123 – Zhang, et al., “A Built-In-Test Circuit for Functional Verification & PVT Variations Monitoring of CMOS RF Circuits,” ISSC 2006, Dublin Institute of Technology, June 28-30, 2006, pp. 217-222	401-403, 37 C.F.R. § 42.6(a)(3): EX2123 is irrelevant, cumulative, misleading, or confusing, and its probative value, if any, is outweighed by prejudice. EX2123 was not cited in POR or other exhibits. 801/802/901: Samsung further objects to EX2123 for lacking foundation and for containing hearsay. <i>See</i> 37 C.F.R. § 42.62(a); Fed. R. Evid. 801–04. For example, Netlist has neither authenticated this exhibit, nor laid the foundation for any hearsay exception.
EX2124 – Majzoub, et al., “PVT Variation Impact on Voltage Island Formation in MPSoC Design,” 10th Int’l Symposium on Quality Electronic Design, March 16-18, 2009, pp. 814-819	401-403, 37 C.F.R. § 42.6(a)(3): EX2124 is irrelevant, cumulative, misleading, or confusing, and its probative value, if any, is outweighed by prejudice. EX2124 was not cited in POR or other exhibits. 801/802/901: Samsung further objects to EX2124 for lacking foundation and for containing hearsay. <i>See</i> 37 C.F.R. § 42.62(a); Fed. R. Evid. 801–04. For example, Netlist has neither authenticated this exhibit, nor laid the foundation for any hearsay exception.
EX2125 – Gopal, et al., “Ultra Low-Supply Voltage Reference Generator with Low Sensitivity to PVT Variations,” 5th Asia Symposium on Quality Electronic Design, August 26-28, 2013, pp. 18-21	401-403, 37 C.F.R. § 42.6(a)(3): EX2125 is irrelevant, cumulative, misleading, or confusing, and its probative value, if any, is outweighed by prejudice. EX2125 was not cited in POR or other exhibits. 801/802/901: Samsung further objects to EX2125 for lacking foundation and for containing hearsay. <i>See</i> 37 C.F.R. § 42.62(a); Fed. R. Evid. 801–04. For example, Netlist has neither authenticated this exhibit, nor laid the foundation for any hearsay exception.

<u>Exhibit</u>	<u>Objection(s)</u>
EX2126 – Miyashita, et al., “A Phase Noise Minimization of CMOS VCOs over Wide Tuning Range and Large PVT Variations,” Proceedings of the IEEE 2005 Custom Integrated Circuits Conference, 2005, September 21, 2005, pp. 583-586	401-403, 37 C.F.R. § 42.6(a)(3): EX2126 is irrelevant, cumulative, misleading, or confusing, and its probative value, if any, is outweighed by prejudice. EX2126 was not cited in POR or other exhibits. 801/802/901: Samsung further objects to EX2126 for lacking foundation and for containing hearsay. <i>See</i> 37 C.F.R. § 42.62(a); Fed. R. Evid. 801–04. For example, Netlist has neither authenticated this exhibit, nor laid the foundation for any hearsay exception.
EX2127 – Docket Sheet, <i>Netlist, Inc. v. Samsung Electronics Co., Ltd. et al.</i> , Case No. 2:25-cv-00557-JRG (E.D. Tex.)	401-403: EX2127 is irrelevant, cumulative, misleading, or confusing, and its probative value, if any, is outweighed by prejudice. Netlist cites this exhibit in connection with its argument that Samsung failed to name all RPIs, Paper No. 31, 6, 21, but the fact that Netlist itself named the alleged RPIs as co-defendants in another district court case has little probative value to any RPI issues here. Also, the Director rejected Netlist’s RPI argument by instituting the 087 PGR. 801/802/901: Samsung further objects to EX2127 for lacking foundation and for containing hearsay. <i>See</i> 37 C.F.R. § 42.62(a); Fed. R. Evid. 801–04. For example, Netlist has neither authenticated this exhibit, nor laid the foundation for any hearsay exception.

<u>Exhibit</u>	<u>Objection(s)</u>
EX2128 – Docket Sheet, <i>Netlist Inc v. Micron Technology, Inc. et al.</i> , Case No. 2:25-cv-00558 (E.D. Tex.)	401-403: EX2128 is irrelevant, cumulative, misleading, or confusing, and its probative value, if any, is outweighed by prejudice. Netlist cites this exhibit in connection with its argument that Samsung failed to name all RPIs, Paper No. 31, 6, but the fact that Netlist itself named the alleged RPIs as co-defendants in another district court case has little probative value to any RPI issues here. Also, the Director rejected Netlist’s RPI argument by instituting the 087 PGR. 801/802/901: Samsung further objects to EX2128 for lacking foundation and for containing hearsay. <i>See</i> 37 C.F.R. § 42.62(a); Fed. R. Evid. 801–04. For example, Netlist has neither authenticated this exhibit, nor laid the foundation for any hearsay exception.
EX2129 – Email from Michel A. Pearson titled “Stipulation re: PGR2025-00071 (U.S. Patent No. 12,308,087); IPR2025-01431 (U.S. Patent No. 10,025,731); and PGR2026-00001, IPR2026-00018 (U.S. Patent No. 12,373,366)” (March 3, 2026)	401-403: EX2129 is irrelevant, cumulative, misleading, or confusing, and its probative value, if any, is outweighed by prejudice. Netlist cites this exhibit in connection with its argument that Samsung failed to name all RPIs, Paper No. 31, 7, 13, but Samsung’s <i>Sotera</i> stipulation has little probative value to any RPI issues here. Also, the Director rejected Netlist’s RPI argument by instituting the 087 PGR.

<u>Exhibit</u>	<u>Objection(s)</u>
EX2130 – Samsung Electronics Co., Ltd. and Its Subsidiaries, Consolidated Financial Statements, Dec. 31, 2025 and 2024 – KPMG Samjong Accounting Corp.	401-403: EX2130 is irrelevant, cumulative, misleading, or confusing, and its probative value, if any, is outweighed by prejudice. Netlist cites this exhibit in connection with its argument that Samsung failed to name all RPIs, Paper No. 31, 10, but the Director rejected Netlist’s RPI argument by instituting the 087 PGR. 801/802/901: Samsung further objects to EX2129 for lacking foundation and for containing hearsay. <i>See</i> 37 C.F.R. § 42.62(a); Fed. R. Evid. 801–04. For example, Netlist has neither authenticated this exhibit, nor laid the foundation for any hearsay exception.
EX2131 – Amended Adopted Procedural Schedule, <i>Certain Dynamic Random Access Memory (DRAM) Devices, Products Containing the Same, and Components Thereof</i> , Inv. No. 337-TA-1472 (ITC), Feb. 6, 2026	401-403: EX2131 is irrelevant, cumulative, misleading, or confusing, and its probative value, if any, is outweighed by prejudice. Netlist cites this exhibit in connection with its argument that Samsung failed to name all RPIs, Paper No. 31, 50, but the Director rejected Netlist’s RPI argument by instituting the 087 PGR. 801/802: Samsung further objects to EX2131 for containing hearsay. <i>See</i> 37 C.F.R. § 42.62(a); Fed. R. Evid. 801–04.

<u>Exhibit</u>	<u>Objection(s)</u>
EX2132 – Redacted Version of Samsung Respondents’ Second Supplemental Objections and Responses to Complainant Netlist’s First Set of Interrogatories (Nos. 1-38), <i>Certain Dynamic Random Access Memory (DRAM) Devices, Products Containing the Same, and Components Thereof</i> , Inv. No. 337-TA-1472 (ITC), March 25, 2026	401-403: EX2132 is irrelevant, cumulative, misleading, or confusing, and its probative value, if any, is outweighed by prejudice. Netlist cites this exhibit in connection with its argument that Samsung presents inconsistent claim constructions, Paper No. 31, 51, 53–54, 64, but factual disputes about infringement are irrelevant to any claim construction issue. Further, the Board rejected Netlist’s request in this proceeding to brief the same issue of allegedly inconsistent constructions. PGR2025-00071, EX3107. 801/802: Samsung further objects to EX2132 for containing hearsay. <i>See</i> 37 C.F.R. § 42.62(a); Fed. R. Evid. 801–04.
EX2133 – Transcript of the Deposition of Andrew Wolfe, Ph.D. in IPR2025-01431, May 15, 2026	EX2133 is defective, and thus inadmissible, under 37 C.F.R. § 42.53(f)(5)-(6). EX2133 is also inaccurate and incomplete, and thus objectionable under at least FRE 106, at least because Patent Owner did not include the errata served on May 28, 2026. Samsung also objects to EX2133 for each of the reasons noted in the objections made during the taking of the underlying deposition. 401-403: EX2133 is irrelevant, cumulative, misleading, or confusing, and its probative value, if any, is outweighed by prejudice. Netlist cites this exhibit in connection with its argument that Samsung failed to name all RPis, Paper No. 31, 12, but the Director rejected Netlist’s RPI argument by instituting the 087 PGR. 801/802: Samsung further objects to EX2133 for containing hearsay. <i>See</i> 37 C.F.R. § 42.62(a); Fed. R. Evid. 801–04.

<u>Exhibit</u>	<u>Objection(s)</u>
EX2134 – Indemnification Clauses in Commercial Contracts	401-403: EX2134 is irrelevant, cumulative, misleading, or confusing, and its probative value, if any, is outweighed by prejudice. Netlist cites this exhibit in connection with its motion for additional discovery regarding RPI (Paper No. 30), but Director already rejected Netlist’s RPI argument by instituting the 087 PGR. 801/802/901: Samsung further objects to EX2134 for lacking foundation and for containing hearsay. <i>See</i> 37 C.F.R. § 42.62(a); Fed. R. Evid. 801–04. For example, Netlist has neither authenticated this exhibit, nor laid the foundation for any hearsay exception.
EX2135 – Manufacturing Contracts Guide	401-403: EX2135 is irrelevant, cumulative, misleading, or confusing, and its probative value, if any, is outweighed by prejudice. Netlist cites this exhibit in connection with its motion for additional discovery regarding RPI (Paper No. 30), but Director already rejected Netlist’s RPI argument by instituting the 087 PGR. 801/802/901: Samsung further objects to EX2135 for lacking foundation and for containing hearsay. <i>See</i> 37 C.F.R. § 42.62(a); Fed. R. Evid. 801–04. For example, Netlist has neither authenticated this exhibit, nor laid the foundation for any hearsay exception.

<u>Exhibit</u>	<u>Objection(s)</u>
EX2136 – “South Korea’s National Pension Fund’s Stock Holdings Surge”	401-403: EX2136 is irrelevant, cumulative, misleading, or confusing, and its probative value, if any, is outweighed by prejudice. Netlist cites this exhibit in connection with its motion for additional discovery regarding RPI (Paper No. 30), but Director already rejected Netlist’s RPI argument by instituting the 087 PGR. 801/802/901: Samsung further objects to EX2136 for lacking foundation and for containing hearsay. <i>See</i> 37 C.F.R. § 42.62(a); Fed. R. Evid. 801–04. For example, Netlist has neither authenticated this exhibit, nor laid the foundation for any hearsay exception.
EX2137 – National Pension Fund Report 2024	401-403: EX2137 is irrelevant, cumulative, misleading, or confusing, and its probative value, if any, is outweighed by prejudice. Netlist cites this exhibit in connection with its motion for additional discovery regarding RPI (Paper No. 30), but Director already rejected Netlist’s RPI argument by instituting the 087 PGR. 801/802/901: Samsung further objects to EX2137 for lacking foundation and for containing hearsay. <i>See</i> 37 C.F.R. § 42.62(a); Fed. R. Evid. 801–04. For example, Netlist has neither authenticated this exhibit, nor laid the foundation for any hearsay exception.

<u>Exhibit</u>	<u>Objection(s)</u>
EX2138 – Invoice	401-403: EX2138 is irrelevant, cumulative, misleading, or confusing, and its probative value, if any, is outweighed by prejudice. Netlist cites this exhibit in connection with its motion for additional discovery regarding RPI (Paper No. 30), but Director already rejected Netlist’s RPI argument by instituting the 087 PGR. 801/802/901: Samsung further objects to EX2138 for lacking foundation and for containing hearsay. <i>See</i> 37 C.F.R. § 42.62(a); Fed. R. Evid. 801–04. For example, Netlist has neither authenticated this exhibit, nor laid the foundation for any hearsay exception.
EX2139 – “SK Hynix posts record first-quarter profit”	401-403: EX2139 is irrelevant, cumulative, misleading, or confusing, and its probative value, if any, is outweighed by prejudice. Netlist cites this exhibit in connection with its argument that Samsung failed to address secondary considerations with respect to a license between Netlist and SK hynix, Paper No. 31, 86–87, but the mere fact that SK hynix may have had a portfolio license agreement with Netlist is an insubstantial secondary consideration here (to the extent it is a secondary consideration and a large portfolio can establish nexus) given the lack of any evidence that the 087 Patent was a significant part of the portfolio license, especially in light of the impact of the JEDEC standards. Moreover, the Director rejected Netlist’s argument by instituting the 087 PGR. 801/802/901: Samsung further objects to EX2139 for lacking foundation and for containing hearsay. <i>See</i> 37 C.F.R. § 42.62(a); Fed. R. Evid. 801–04. For example, Netlist has neither authenticated this exhibit, nor laid the foundation for any hearsay exception.

<u>Exhibit</u>	<u>Objection(s)</u>
EX2140 – “SK hynix’s US Sales Make Up Over 70% in Q1”	401-403: EX2140 is irrelevant, cumulative, misleading, or confusing, and its probative value, if any, is outweighed by prejudice. Netlist cites this exhibit in connection with its argument that Samsung failed to address secondary considerations with respect to a license between Netlist and SK hynix, Paper No. 31, 86–87, but the mere fact that SK hynix may have had a portfolio license agreement with Netlist is an insubstantial secondary consideration here (to the extent it is a secondary consideration and a large portfolio can establish nexus) given the lack of any evidence that the 087 Patent was a significant part of the portfolio license, especially in light of the impact of the JEDEC standards. Moreover, the Director rejected Netlist’s argument by instituting the 087 PGR. 801/802/901: Samsung further objects to EX2140 for lacking foundation and for containing hearsay. <i>See</i> 37 C.F.R. § 42.62(a); Fed. R. Evid. 801–04. For example, Netlist has neither authenticated this exhibit, nor laid the foundation for any hearsay exception.

<u>Exhibit</u>	<u>Objection(s)</u>
EX2141 – “SK Hynix Racks Up 70% of Sales in US on AI Chip Boom”	401-403: EX2141 is irrelevant, cumulative, misleading, or confusing, and its probative value, if any, is outweighed by prejudice. Netlist cites this exhibit in connection with its argument that Samsung failed to address secondary considerations with respect to a license between Netlist and SK hynix, Paper No. 31, 86–87, but the mere fact that SK hynix may have had a portfolio license agreement with Netlist is an insubstantial secondary consideration here (to the extent it is a secondary consideration and a large portfolio can establish nexus) given the lack of any evidence that the 087 Patent was a significant part of the portfolio license, especially in light of the impact of the JEDEC standards. Moreover, the Director rejected Netlist’s argument by instituting the 087 PGR. 801/802/901: Samsung further objects to EX2141 for lacking foundation and for containing hearsay. <i>See</i> 37 C.F.R. § 42.62(a); Fed. R. Evid. 801–04. For example, Netlist has neither authenticated this exhibit, nor laid the foundation for any hearsay exception.

<u>Exhibit</u>	<u>Objection(s)</u>
EX2142 – “SK hynix Starts Mass-Production of High-Speed DRAM, ‘HBM2E’”	401-403: EX2142 is irrelevant, cumulative, misleading, or confusing, and its probative value, if any, is outweighed by prejudice. Netlist cites this exhibit in connection with its argument that Samsung failed to address secondary considerations with respect to a license between Netlist and SK hynix, Paper No. 31, 88, but the mere fact that SK hynix may have had a portfolio license agreement with Netlist is an insubstantial secondary consideration here (to the extent it is a secondary consideration and a large portfolio can establish nexus) given the lack of any evidence that the 087 Patent was a significant part of the portfolio license, especially in light of the impact of the JEDEC standards. Moreover, the Director rejected Netlist’s argument by instituting the 087 PGR. 801/802/901: Samsung further objects to EX2142 for lacking foundation and for containing hearsay. <i>See</i> 37 C.F.R. § 42.62(a); Fed. R. Evid. 801–04. For example, Netlist has neither authenticated this exhibit, nor laid the foundation for any hearsay exception.

<u>Exhibit</u>	<u>Objection(s)</u>
EX2143 – “SK hynix Announces Development of HBM3 DRAM”	401-403: EX2143 is irrelevant, cumulative, misleading, or confusing, and its probative value, if any, is outweighed by prejudice. Netlist cites this exhibit in connection with its argument that Samsung failed to address secondary considerations with respect to a license between Netlist and SK hynix, Paper No. 31, 88, but the mere fact that SK hynix may have had a portfolio license agreement with Netlist is an insubstantial secondary consideration here (to the extent it is a secondary consideration and a large portfolio can establish nexus) given the lack of any evidence that the 087 Patent was a significant part of the portfolio license, especially in light of the impact of the JEDEC standards. Moreover, the Director rejected Netlist’s argument by instituting the 087 PGR. 801/802/901: Samsung further objects to EX2143 for lacking foundation and for containing hearsay. <i>See</i> 37 C.F.R. § 42.62(a); Fed. R. Evid. 801–04. For example, Netlist has neither authenticated this exhibit, nor laid the foundation for any hearsay exception.

<u>Exhibit</u>	<u>Objection(s)</u>
EX2144 – “SK hynix to Supply Industry’s First HBM3 DRAM to NVIDIA”	401-403: EX2144 is irrelevant, cumulative, misleading, or confusing, and its probative value, if any, is outweighed by prejudice. Netlist cites this exhibit in connection with its argument that Samsung failed to address secondary considerations with respect to a license between Netlist and SK hynix, Paper No. 31, 88, but the mere fact that SK hynix may have had a portfolio license agreement with Netlist is an insubstantial secondary consideration here (to the extent it is a secondary consideration and a large portfolio can establish nexus) given the lack of any evidence that the 087 Patent was a significant part of the portfolio license, especially in light of the impact of the JEDEC standards. Moreover, the Director rejected Netlist’s argument by instituting the 087 PGR. 801/802/901: Samsung further objects to EX2144 for lacking foundation and for containing hearsay. <i>See</i> 37 C.F.R. § 42.62(a); Fed. R. Evid. 801–04. For example, Netlist has neither authenticated this exhibit, nor laid the foundation for any hearsay exception.

<u>Exhibit</u>	<u>Objection(s)</u>
EX2145 – “SK hynix Completes World-First HBM4 Development”	401-403: EX2145 is irrelevant, cumulative, misleading, or confusing, and its probative value, if any, is outweighed by prejudice. Netlist cites this exhibit in connection with its argument that Samsung failed to address secondary considerations with respect to a license between Netlist and SK hynix, Paper No. 31, 88, but the mere fact that SK hynix may have had a portfolio license agreement with Netlist is an insubstantial secondary consideration here (to the extent it is a secondary consideration and a large portfolio can establish nexus) given the lack of any evidence that the 087 Patent was a significant part of the portfolio license, especially in light of the impact of the JEDEC standards. Moreover, the Director rejected Netlist’s argument by instituting the 087 PGR. 801/802/901: Samsung further objects to EX2145 for lacking foundation and for containing hearsay. <i>See</i> 37 C.F.R. § 42.62(a); Fed. R. Evid. 801–04. For example, Netlist has neither authenticated this exhibit, nor laid the foundation for any hearsay exception.
EX2146 – Redline Comparison of U.S. Patent Application No. 13/288,850 to U.S. Patent Application No. 14/337,168	401-403, 37 C.F.R. § 42.6(a)(3): EX2146 is irrelevant because it was not cited in POR. 801/802/901: Samsung further objects to EX2146 for lacking foundation and for containing hearsay. <i>See</i> 37 C.F.R. § 42.62(a); Fed. R. Evid. 801–04. For example, Netlist has neither authenticated this exhibit, nor laid the foundation for any hearsay exception.
EX2147 – Redline Comparison of U.S. Patent Application No. 13/288,850 to U.S. Patent Application No. 15/095,288	401-403, 37 C.F.R. § 42.6(a)(3): EX2147 is irrelevant because it was not cited in POR. 801/802/901: Samsung further objects to EX2147 for lacking foundation and for containing hearsay. <i>See</i> 37 C.F.R. § 42.62(a); Fed. R. Evid. 801–04. For example, Netlist has neither authenticated this exhibit, nor laid the foundation for any hearsay exception.

<u>Exhibit</u>	<u>Objection(s)</u>
EX2148 – Redline Comparison of U.S. Patent Application No. 13/288,850 to U.S. Patent Application No. 15/602,099	401-403, 37 C.F.R. § 42.6(a)(3): EX2148 is irrelevant because it was not cited in POR. 801/802/901: Samsung further objects to EX2148 for lacking foundation and for containing hearsay. <i>See</i> 37 C.F.R. § 42.62(a); Fed. R. Evid. 801–04. For example, Netlist has neither authenticated this exhibit, nor laid the foundation for any hearsay exception.
EX2149 – Redline Comparison of U.S. Patent Application No. 13/288,850 to U.S. Patent Application No. 16/412,308	401-403, 37 C.F.R. § 42.6(a)(3): EX2149 is irrelevant because it was not cited in POR. 801/802/901: Samsung further objects to EX2149 for lacking foundation and for containing hearsay. <i>See</i> 37 C.F.R. § 42.62(a); Fed. R. Evid. 801–04. For example, Netlist has neither authenticated this exhibit, nor laid the foundation for any hearsay exception.
EX2150 – Redline Comparison of U.S. Patent Application No. 13/288,850 to U.S. Patent Application No. 17/157,903	401-403, 37 C.F.R. § 42.6(a)(3): EX2150 is irrelevant because it was not cited in POR. 801/802/901: Samsung further objects to EX2150 for lacking foundation and for containing hearsay. <i>See</i> 37 C.F.R. § 42.62(a); Fed. R. Evid. 801–04. For example, Netlist has neither authenticated this exhibit, nor laid the foundation for any hearsay exception.
EX2151 – Redline Comparison of U.S. Patent Application No. 13/288,850 to U.S. Patent Application No. 17/694,649	401-403, 37 C.F.R. § 42.6(a)(3): EX2151 is irrelevant because it was not cited in POR. 801/802/901: Samsung further objects to EX2151 for lacking foundation and for containing hearsay. <i>See</i> 37 C.F.R. § 42.62(a); Fed. R. Evid. 801–04. For example, Netlist has neither authenticated this exhibit, nor laid the foundation for any hearsay exception.

Dated: June 12, 2026

/Eliot D. Williams/
Eliot D. Williams
Reg. No. 50,822
BAKER BOTTS L.L.P.
700 K Street, N.W.
Washington, D.C. 20001

T: (202) 639-1334
F: (202) 639-1167

Theodore W. Chandler
Reg. No. 50,319
BAKER BOTTS L.L.P.
1801 Century Park East
Suite 2400
Los Angeles, CA 90067
T: (213) 202-5702
F: (213) 202-5732

Ferenc Pazmandi
Reg. No. 66,216
BAKER BOTTS L.L.P.
101 California Street
Suite 3200
San Francisco, CA 94111
T: (415) 291-6255
F: (415) 291-6355

Mark A. Speegle
Reg. No. 77,512
BAKER BOTTS L.L.P.
401 South First Street, Suite 1300
Austin, Texas 78704
T: (512) 322-2536
F: (512) 322-3636

*Counsel for Petitioner
Samsung Electronics Co., Ltd.*

CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6(e), I certify that on this 12th day of June, 2026,

Petitioner's Objections to Patent Owner's Evidence Submitted With Patent

Owner's Response and Patent Owner's Motion for Additional Discovery was

served by email on the following counsel for Patent Owner:

Richard M. Bemben (Reg. No. 68,658) STERNE, KESSLER, GOLDSTEIN & FOX PLLC 1101 K Street NW, 10th Floor Washington, DC 20005 Phone: (202) 772-8549 Fax: (202) 371-2540 Email: PTAB@sternekessler.com rbemben-PTAB@sternekessler.com	Jennifer Meyer Chagnon (Reg. No. 55,440) STERNE, KESSLER, GOLDSTEIN & FOX PLLC 1101 K Street NW, 10th Floor Washington, DC 20005 Phone: (202) 772-8890 Fax: (202) 371-2540 Email: PTAB@sternekessler.com jchagnon-PTAB@sternekessler.com
Richard C. Kim (Reg. No. 40,046) NETLIST, INC. 111 Academy Way, Suite 100 Irvine, California 92617 Phone: (949) 679-0124 Email: PTAB@sternekessler.com rkim@netlist.com	Raymond K. Chan (Reg. No. 66,164) NETLIST, INC. 111 Academy Way, Suite 100 Irvine, California 92617 Phone: (949) 679-0101 Email: PTAB@sternekessler.com rchan@netlist.com
Francisco A. Rubio-Campos (Reg. No. 45,358) NETLIST, INC. 111 Academy Way, Suite 100 Irvine, California 92617 Phone: (949) 377-0296 Email: PTAB@sternekessler.com frubio@netlist.com	

Dated: June 12, 2026

/Eliot D. Williams/
Eliot D. Williams, Reg. #50,822
BAKER BOTTS L.L.P.
700 K Street, N.W.
Washington, D.C. 20001
T: (202) 639-1334

F: (202) 639-1167

*Counsel for Petitioner Samsung
Electronics Co., Ltd.*