

**From:** [Joel Glazer](#)  
**To:** [Trials](#)  
**Cc:** [oceansemi-dlf](#); [Sano, Jeannine](#); [ekrause@axinn.com](#); [plee@axinn.com](#); [Applied-Ocean@axinn.com](#); [Joseph Zito](#)  
**Subject:** Applied Materials v. Ocean, IPR2021-01339, -01340, -01342, and -01344  
**Date:** Monday, August 15, 2022 8:28:20 PM  
**Attachments:** [image001.png](#)

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Dear Honorable Board,

Patent Owner Ocean Semiconductor LLC seeks to notify the Board of a discovery impasse between Patent Owner Ocean Semiconductor LLC and Petitioner Applied Materials, Inc. regarding four pending IPRs; namely:

1. IPR2021-01339 (Patent No. 8,676,538);
2. IPR2021-01340 (Patent No. 6,725,402);
3. IPR2021-01342 (Patent No. 6,968,248); and
4. IPR2021-01344 (Patent No. 6,907,305).

On July 28, 2022, Patent Owner contacted Petitioner to schedule depositions of Petitioner's two expert witnesses whose expert declarations are being relied upon by Petitioner in its Reply to Patent Owner's Response. Petitioner refused to produce its two experts for deposition on the purported basis that they are not "reply witnesses" and that Petitioner did not submit any "new expert declaration." Petitioner, however, left open the door to reconsidering Patent Owner's request subject to additional authorities on this issue, which Patent Owner provided on August 2 and August 3, 2022. On August 9, 2022, Patent Owner served notices of deposition in the above-referenced actions. On August 10, 2022, Petitioner maintained its position and refused to make its experts available for deposition.

Given this discovery impasse, and given the time sensitive nature of this request based on the September 7, 2022 deadline for Patent Owner's sur-reply, Patent Owner seeks the Board's guidance and respectfully requests a conference call with the Board. Patent Owner is available at the Board's convenience.

Respectfully,  
Joel Glazer (Reg. No. 76, 493)



**Joel Glazer**

1526 Gilpin Ave, Wilmington, DE 19806  
☎ (440) 667-7109

