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EXHIBITS: None

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

MICRON TECHNOLOGY, INC.,
Petitioner,

v.

VERVAIN, LLC,
Patent Owner

Case IPR2021-01547, -01548, and -01549
Patents 8,891,298; 9,196,385; and 9,997,240
Title: LIFETIME MIXED LEVEL NON-VOLATILE
MEMORY SYSTEM

DEPOSITION of SUNIL P. KHATRI, PH.D.

- CONDUCTED BY VIDEOCONFERENCE -

Thursday, September 1, 2022

10:01 a.m. Central Daylight Time

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I N D E X

Deposition of:	Page
SUNIL P. KHATRI, PH.D.	
By Mr. Lang	5

E X H I B I T S

(None)

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P R O C E E D I N G S

MR. LANG: This is Jason Lang on behalf of
petitioner Micron. I have with me my colleague
Parth Sagdeo.

And, Arvind, I guess we had talked about
today this deposition will cover the IPR
proceeding 2021-01547 through -49, which is the
'298, '385, and '240 patents.

MR. JAIRAM: Yes.

This is Arvind Jairam of McKool Smith on
behalf of patent owner Vervain, LLC.

And yes, Jason, I agree that those are the
IPRs, the 1547, 1548, 1549 proceedings.

And our understanding is that the
deposition transcript will be closed after today's
deposition session and a new transcript will be
opened tomorrow to cover only the 1550 proceeding.

MR. LANG: Sure.

SUNIL P. KHATRI, PH.D.,
having been satisfactorily identified and duly
sworn by the Notary Public, was examined and
testified as follows:

1 EXAMINATION BY COUNSEL FOR
2 PETITIONER MICRON TECHNOLOGY, INC.

3 BY MR. LANG:

4 Q. All right. Dr. Khatri, good morning. If
5 you need a break, just let me know. I'll just --
6 I know you've been through the rodeo before.
7 You've been deposed a number of times. Right?

8 A. That's correct. Yes.

9 Q. Okay. Is there any reason you can't tell
10 the -- you can't testify truthfully today?

11 A. There isn't.

12 Q. Okay. So I just want to start with, have
13 you ever worked with blocks in the context of
14 flash memory before?

15 A. I guess it depends on what you mean by
16 "worked with blocks."

17 Q. Okay. When you heard the word "block" in
18 the context of flash memory in the 2010 time
19 frame, what did that mean to you?

20 MR. JAIRAM: Objection, form.

21 A. So, you know, I think in that time frame
22 the word "block" that people used was to indicate

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