

VOLUME 1  
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UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

MICRON TECHNOLOGY, INC.,  
Petitioner,

v.

VERVAIN, LLC,  
Patent Owner

Case IPR2021-01550

U.S. Patent No. 10,950,300

Title: LIFETIME MIXED LEVEL NON-VOLATILE  
MEMORY SYSTEM

DEPOSITION of SUNIL P. KHATRI, PH.D.

- CONDUCTED BY VIDEOCONFERENCE -

Friday, September 2, 2022

10:01 a.m. Central Daylight Time

Michelle Keegan, RMR, CRR  
Lexitas  
508-478-9795 ~ 508-478.0595 (Fax)  
www.LexitasLegal.com

1 A P P E A R A N C E S:

2

3 ORRICK, HERRINGTON & SUTCLIFFE LLP  
4 By: Jason Lang, Esq.  
5 1000 Marsh Road  
6 Menlo Park, California 94025-1015  
7 Phone: (650) 614-7400  
8 Email: jlang@orrick.com  
9 Counsel for Petitioner Micron Technology, Inc.

7

8 ORRICK, HERRINGTON & SUTCLIFFE LLP  
9 By: Parth Sagdeo, Esq.  
10 222 Berkeley Street, Suite 2000  
11 Boston, Massachusetts 02116  
12 Phone: (617) 880-1800  
13 Email: psagdeo@orrick.com  
14 Counsel for Petitioner Micron Technology, Inc.

11

12 MCKOOL SMITH  
13 By: Arvind Jairam, Esq.  
14 1999 K Street, NW, Suite 600  
15 Washington, D.C. 20006  
16 Phone: (202) 370-8300  
17 Email: ajairam@mckoolsmith.com  
18 Counsel for Patent Owner Vervain, LLC

16

17 Also Present:  
18 Caylob Suarez, Video Monitor

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I N D E X

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By Mr. Jairam	154

E X H I B I T S

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Exhibit 1057	US Patent Application Publication, Moshayedi, Pub No US 2009/0327591 A1, 12/31/2009, 18 pages without Bates numbering	80

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P R O C E E D I N G S

SUNIL P. KHATRI, PH.D.,

having been satisfactorily identified and duly  
sworn by the Notary Public, was examined and  
testified as follows:

EXAMINATION BY COUNSEL FOR

PETITIONER MICRON TECHNOLOGY, INC.

BY MR. SAGDEO:

Q. All right. Good morning, Dr. Khatri.  
Thanks for coming back for another day.

So let's start with a few housekeeping  
questions. Where are you at the moment?

A. I am in College Station, Texas.

Q. Is there anybody in the room with you?

A. No.

Q. Other than the computer that you're using  
for the videoconference, do you have any computers  
or documents or other information in your presence  
right now?

A. I have other computers in the house, but  
they are far away. I'm not looking at them. They  
are not accessible to me. There's this one

1 desktop which I'm using which is hosting the Zoom  
2 call. And that's the only desktop -- that's the  
3 only computer that's on at this point.

4 And in terms of documents, I think you  
5 asked --

6 Q. Yeah.

7 A. -- I have a printout which was agreed upon  
8 I think by both sides. I have a printout of the  
9 '300 patent with me, my declaration for the '300  
10 patent -- these are unmarked copies -- and also  
11 the printout of Dusija. And actually Moshayedi  
12 from last night as well.

13 So I have a printout of these patents --  
14 the '300 patent as well as my declaration. And  
15 that's about it. None of these are marked.

16 Q. Okay. Sounds good. So because I'm not  
17 there with you, I'll ask that you not look at any  
18 documents unless I ask you to specifically. Does  
19 that sound okay?

20 A. And if I need to look at a document, I'll  
21 let you know that I'm looking at it, if that's  
22 okay.

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