

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

REALTEK SEMICONDUCTOR CORP.,
Petitioner,

v.

ATI TECHNOLOGIES ULC
Patent Owner.

Case No. IPR2023-00922
U.S. Patent No. 8,760,454

DECLARATION OF CALVIN WATSON

TABLE OF CONTENTS

	Page
I. BACKGROUND AND INTRODUCTION	1
II. PRIOR DECLARATIONS	3
III. PERFORCE	5
A. Documents Saved in Perforce	6
1. PowerPoint Presentations (Program Reviews)	7
2. Technical Specifications	8
3. Other Documents	9
B. Metadata Saved in Perforce	9
1. Document Logs	10
2. Folder Histories	11
IV. AUTHENTICATION OF EXHIBITS	12
1. Exhibit 2024 (Program Review)	12
2. Exhibit 2025 (Technical Specification)	12
3. Exhibit 2026 (Technical Specification)	13
4. Exhibit 2027 (Technical Specification)	13
5. Exhibit 2028 (Technical Specification)	14
6. Exhibit 2032 (Program Review)	14
7. Exhibit 2033 (Program Review)	14
8. Exhibit 2038 (Technical Specification)	15
9. Exhibit 2040 (Program Review)	15
10. Exhibit 2041 (Program Review)	15
11. Exhibit 2071 (Regression Report)	16
12. Exhibit 2073 (Regression Reports)	16
13. Exhibit 2079 (Technical Specification)	18
14. Exhibit 2088 (Program Review)	19
15. Exhibit 2089 (Program Reviews)	19
16. Exhibit 2090 (Folder History)	26

17. Exhibit 2091 (Folder History).....26
18. Exhibit 2092 (Folder History).....26
19. Exhibit 2093 (Folder History).....27
20. Exhibit 2094 (Folder History).....27
21. Exhibit 2095 (Folder History).....27
22. Exhibit 2096 (Folder History).....27
23. Exhibit 2097 (Folder History).....28
24. Exhibit 2098 (Document Logs)28
25. Exhibit 2099 (Netlist Excel Files)34
26. Exhibit 2112 (Document Logs and Folder Histories).....35

I, Calvin Watson, declare as follows:

I. BACKGROUND AND INTRODUCTION

1. I am a technical specialist and patent agent at Advanced Micro Devices, Inc. (“AMD”). My responsibilities include, among other things, supporting the AMD law department on various intellectual property matters.

2. I understand that ATI merged with AMD in 2006. I understand that ATI’s documents are now managed on AMD’s database system, one of which is known as Perforce, which is the same system that ATI used before the merger with AMD. From my responsibilities at AMD, I am familiar with creating, editing, reviewing, maintaining, and retrieving files in Perforce.

3. I understand the above captioned case filed by Petitioner Realtek Semiconductor Corp. involves U.S. Patent Number 8,760,454 (the “’454 patent”). I understand the ’454 patent is currently assigned to ATI Technologies ULC (“ATI”).

4. In this declaration, I provide an overview of Perforce and the types of files that ATI/AMD engineers saved in Perforce. I also intend to authenticate the following Exhibits which were submitted in the ’454 patent IPR. The Exhibits below are true and correct copies of documents, folder histories, document logs, and/or metadata retrieved from AMD’s document databases. Each of these files was kept in the ordinary course of AMD/ATI’s business, and the original

documents, folder histories, document logs, and/or metadata remain in AMD's possession, custody, and control today. I understand these files were produced as exhibits to the instant case with the following exhibit numbers:

Exhibit No.	Reference Name
Ex. 2024	R400 Executive Review (Sept. 16, 2002)
Ex. 2025	GFIXIP 9x SX Micro-Architecture Specification (Version 1.0)
Ex. 2026	WD/IA/VGT Micro-Architecture Specification (Version 1.0)
Ex. 2027	GX9 SPI Specification (Version 1.0)
Ex. 2028	R400 Top Level Specification (Version 0.2)
Ex. 2032	R400 Program Review (Feb. 12, 2003)
Ex. 2033	R400 Program Review (Jan. 15, 2003)
Ex. 2038	R400 Primitive Assembly (Version 0.1)
Ex. 2040	R400 Program Review (Aug. 29, 2002)
Ex. 2041	R400 Program Review
Ex. 2071	Sqsp Regression Report
Ex. 2073	R400 Regression Testing
Ex. 2079	SQ Thread Trace 2.3 User's Guide
Ex. 2088	R400 Executive Review (Sept. 16, 2002)
Ex. 2089	R400 Program Reviews (Various Dates)
Ex. 2090	R400 PA Block Folder History
Ex. 2091	R400 RB Block Folder History
Ex. 2092	R400 SC Block Folder History
Ex. 2093	R400 SPI Block Folder History
Ex. 2094	R400 SP Block Folder History
Ex. 2095	R400 SQ Block Folder History
Ex. 2096	R400 SX Block Folder History
Ex. 2097	R400 VGT Block Folder History
Ex. 2098	R400 Source Code Document Logs 10/1/2002 – 4/17/2003
Ex. 2099	R400 Netlist Area Sheets
Ex. 2112	R400 Source Code Document Logs and Folder Histories

Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.