

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
MIDLAND/ODESSA DIVISION**

PALISADE TECHNOLOGIES, LLP,

*Plaintiff,*

v.

MICRON TECHNOLOGY, INC. and  
MICRON SEMICONDUCTOR  
PRODUCTS, INC.

*Defendants.*

Case No. 7:24-cv-00262-DC-DTG

**Jury Trial Demanded**

**DEFENDANTS MICRON TECHNOLOGY, INC. AND MICRON SEMICONDUCTOR  
PRODUCTS, INC.’S FIRST SUPPLEMENTAL OBJECTIONS AND RESPONSES TO  
PLAINTIFF PALISADE TECHNOLOGIES, LLP’S VENUE-RELATED  
30(B)(6) NOTICE**

Pursuant to the Court’s Standing Order Governing Patent Proceedings (OGP) and in accordance with Federal Rule of Civil Procedure 30(b)(6), Defendants Micron Technology, Inc. and Micron Semiconductor Products, Inc. (collectively, “Micron” or “Defendants”) provide the following objections and responses to Plaintiff Palisade Technologies, LLP’s (“Plaintiff” or “Palisade”) Venue-Related Rule 30(b)(6) Deposition Notice (“Notice”) to Defendants. Micron provides these written responses to Plaintiff’s requests subject to the general and specific objections stated below. Micron reserves the right to supplement and/or amend these Objections and Responses in accordance with the Federal Rules of Civil Procedure.

**GENERAL OBJECTIONS**

The following general objections apply to each and every topic in the Notice and are incorporated into each of the following responses by reference as if set forth fully therein.

1. Micron objects to each topic, definition, and instruction in the Notice, and any questions asked of Micron’s corporate designee(s) thereunder, to the extent that they are vague,

ambiguous, overbroad, unduly burdensome, harassing, incomprehensible, and seek information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, nor proportional to the needs of the case.

2. Micron objects to each topic, definition, and instruction in the Notice, and any questions asked of Micron's corporate designee(s) thereunder, to the extent that they are not reasonably limited in time or scope.

3. Micron objects to each topic, definition, and instruction in the Notice, and any questions asked of Micron's corporate designee(s) thereunder, to the extent that they seek information protected from disclosure by the attorney-client privilege, the work-product doctrine, the common-interest privilege, joint-defense privilege, Fed. R. Civ. P. 26(b)(4)(A), F.R.E. 408, or any other privilege or immunity. No information so protected will be provided. Micron hereby claims such privileges and protections to the extent implicated by each topic in the Notice and will exclude all such privileged and protected information from its responses.

4. Micron objects to each topic, definition, and instruction in the Notice, and any questions asked of Micron's corporate designee(s) thereunder, to the extent that they seek to elicit confidential and/or proprietary information of third parties and/or information that is subject to or precluded by restrictions of confidentiality imposed by, or pursuant to, agreements between Micron and third parties in the absence of permission by those third parties to reveal such information to Plaintiff.

5. Micron objects to each topic, definition, and instruction in the Notice, and any questions asked of Micron's corporate designee(s) thereunder, to the extent that they seek confidential or proprietary business or product information of Micron related to products not yet announced to the public and Micron will not provide such information in response to these topics.

6. Micron objects to each topic, definition, and instruction in the Notice, and any questions asked of Micron's corporate designee(s) thereunder, to the extent that they seek information that is not relevant to the claim or defense of any party.

7. Micron objects to each topic, definition, and instruction in the Notice, and any questions asked of Micron's corporate designee(s) thereunder, to the extent that they call for a legal conclusion. Any response by Micron shall not be construed as providing a legal conclusion regarding the meaning or application of any terms or phrases used in the Notice.

8. Micron objects to each topic, definition, and instruction in the Notice, and any questions asked of Micron's corporate designee(s) thereunder, to the extent that the information requested therein is not within the possession, custody, or control of Micron.

9. Micron objects to each topic, definition, and instruction in the Notice, and any questions asked of Micron's corporate designee(s) thereunder, to the extent that they purport to impose obligations on Micron that exceed the obligations imposed upon a responding party under the Federal Rules of Civil Procedure, the Federal Rules of Evidence, the local rules, the Court's orders (including the Docket Control Order entered in this matter), or other applicable law.

10. Micron objects to each topic, definition, and instruction in the Notice, and any questions asked of Micron's corporate designee(s) thereunder, to the extent that they seek discovery concerning Micron's contentions in this matter before Micron has had the opportunity to conduct full discovery.

11. Micron objects to each topic, definition, and instruction in the Notice, and any questions asked of Micron's corporate designee(s) thereunder, to the extent that they are cumulative and duplicative of other forms of discovery that are more convenient and less burdensome.

12. Micron objects to each topic, definition, and instruction in the Notice, and any questions asked of Micron's corporate designee(s) thereunder, to the extent that they seek to require Micron to do more than conduct an examination of those files or sources that reasonably may be expected to yield responsive information, or an inquiry of those persons who may be reasonably expected to possess responsive information.

13. Micron objects to each topic, definition, and instruction in the Notice, and any questions asked of Micron's corporate designee(s) thereunder, to the extent that they improperly and prematurely seek discovery of expert opinions. Such information will be disclosed within the timeframe outlined by the Scheduling Order governing this case.

14. Micron objects to the definitions of "YOU," "YOUR," and "DEFENDANTS" as vague, ambiguous, overly broad, unduly burdensome, and invasive of the attorney-client and attorney-work-product privileges and protections to the extent that the definitions include counsel. Micron further objects to the definitions, to the extent that they fail to distinguish Micron Technology, Inc. and Micron Semiconductor Products, Inc. from other separate and independent corporate entities or recognize that actions taken by past or current employees outside the scope of their employment and/or actions taken without Micron's knowledge are not attributable to Micron. In responding to these requests, Micron will respond on the basis that "Micron," "Defendant(s)," "you," and "your" refer only to the named Defendants Micron Technology, Inc. and Micron Semiconductor Products, Inc., and such persons authorized to act on their behalf and within the proper scope of their respective authorized capacities.

15. Micron objects to the definitions of the terms "PERSON," "PERSONS," "THIRD PARTY(IES)," "COMPLAINT," "OFFICE," "DOCUMENT," "THING," "RELATING TO," "REFERRING TO," "FILE," "IDENTITY," and "COMMUNICATIONS," as vague and

ambiguous, overly broad, and unduly burdensome to the extent that the definitions (in combination with the individual topics): (i) seek to encompass information that is not relevant to the claims or defense of any party or proportional to the needs of the case; (ii) are not reasonably limited in time or scope; (iii) seek to encompass information not within Micron's possession, custody or control; and/or (iv) seek to encompass information protected from disclosure by the attorney-client privilege, the work-product doctrine, the common-interest privilege, the joint-defense privilege, Fed. R. Civ. P. 26(b)(4)(A), or any other applicable privilege or immunity. Micron also objects to these definitions to the extent that they presume that Micron has knowledge of each of the persons or entities within the scope of the definitions.

16. Micron objects to the term "ACCUSED PRODUCT(S)" as vague, ambiguous, overly broad, and unduly burdensome because it has not been sufficiently defined by Plaintiff and because it covers technology not disclosed in the Asserted Patent. Micron further objects to these terms as overly broad because they include products that are not made, used, offered for sale, or sold within or imported into the United States, and they include products that were sold more than six years before the filing of the Complaint. For the purposes of responding to the Notice, Micron will interpret these terms to include only those products for which Plaintiff has provided infringement contentions.

17. Discovery is ongoing in this action, and Micron has not completed its discovery or investigation into the parties' claims and defenses. Micron therefore objects and responds to the Notice based upon information in its possession after diligent inquiry at the time of preparation of these responses. Micron reserves the right to amend, supplement, and correct its objections or responses as additional information becomes available to Micron in the course of its ongoing discovery and investigation.

18. These objections, and any testimony provided by Micron in response to any topic, are not intended to waive or limit any objections Micron may assert now or in the future, including, without limitation, objections as to the relevance of the subject matter of any topic in the Notice, to questions posed at the deposition, or as to the admissibility of any testimony at trial or in any other proceedings. Micron expressly reserves any and all rights and privileges under the Federal Rules of Civil Procedure, the Federal Rules of Evidence, the local rules, the Court's Orders (including the Docket Control Order entered in this matter), or other applicable law, and the failure to assert such rights and privileges or the inadvertent disclosure by Micron of information protected by such rights and privileges shall not constitute a waiver thereof.

19. To the extent any specific General Objections are cited in a specific response, those citations are provided because they are believed to be particularly applicable to the specific topic and are not to be construed as a waiver of any other General Objections applicable to responses falling within the scope of that topic or any other topic.

20. The foregoing General Objections shall be deemed continuous throughout the responses to the specific topics that follow, even though not specifically referred to in the responses.

### **DEPOSITION TOPICS**

#### **VENUE TOPIC NO. 1**

The identity of every Office of Yours or used by You in the United States, including the location of the Office, the corporate functions performed at that Office, the business units and teams that use that Office, and all Accused Products stored at that Office.

#### **RESPONSE TO VENUE TOPIC NO. 1**

In addition to the foregoing General Objections, Micron objects to this Topic for all the same reasons it objects to Interrogatory No. 1. Micron further objects to this Topic to the extent it

requires a fact witness to testify about legal issues. Micron further objects to this Topic to the extent it seeks information protected by attorney-client privilege, the work-product doctrine, the common-interest privilege, or any other applicable privilege or immunity doctrines. Micron further objects to this Topic to the extent it seeks testimony irrelevant to Micron's Motion to Transfer and is therefore beyond of the scope of permissible venue discovery.

Subject to and without waiving any of the foregoing objections, Micron responds as follows:

Micron will provide one or more witnesses to testify regarding the offices, their locations, and where Micron conducts research, development, design, and manufacture of the Accused Products to the extent such information is relevant to Micron's Motion to Transfer and is non-privileged and not protected by work product immunity.

## **VENUE TOPIC NO. 2**

For lawsuits in which You were a party, all motions to transfer to or from the Western District of Texas or District of Idaho, including any declarations in support thereof.

## **RESPONSE TO VENUE TOPIC NO. 2**

In addition to the foregoing General Objections, Micron objects to this Topic for all the same reasons it objects to RFP No. 1. Micron further objects to this Topic to the extent it requires a fact witness to testify about legal issues. Micron further objects to this Topic to the extent it seeks information protected by attorney-client privilege, the work-product doctrine, the common-interest privilege, or any other applicable privilege or immunity doctrines. Micron further objects to this Topic to the extent it seeks testimony irrelevant to Micron's Motion to Transfer and is therefore beyond of the scope of permissible venue discovery.

Subject to and without waiving any of the foregoing objections, Micron responds as follows:

Micron will not produce a witness in response to this topic.

**VENUE TOPIC NO. 3**

The technical and financial information relevant to this Litigation, including the persons responsible for creating and maintaining that information, where those persons perform(ed) those tasks and reside(d), where that information is stored, how it is stored, and where it is accessible.

**RESPONSE TO VENUE TOPIC NO. 3**

In addition to the foregoing General Objections, Micron objects to this Topic for all the same reasons it objects to RFP No. 3. Micron further objects to this Topic to the extent it requires a fact witness to testify about legal issues. Micron further objects to this Topic to the extent it seeks information protected by attorney-client privilege, the work-product doctrine, the common-interest privilege, or any other applicable privilege or immunity doctrines. Micron further objects to this Topic to the extent it seeks testimony irrelevant to Micron's Motion to Transfer and is therefore beyond of the scope of permissible venue discovery.

Subject to and without waiving any of the foregoing objections, Micron responds as follows:

Micron will provide one or more witnesses with technical information relevant to Micron's Motion to Transfer, including the persons responsible for creating and maintaining that information, where those persons perform(ed) those tasks and where that information is stored, to the extent such information is relevant to Micron's transfer motion and is non-privileged and not protected by work product immunity.

**VENUE TOPIC NO. 4**

The identity of every employee of Yours that resides in Texas or Idaho, including their job title and responsibilities, their business unit and team, their place of residence, their Office used, and their employer entity.

**RESPONSE TO VENUE TOPIC NO. 4**

In addition to the foregoing General Objections, Micron objects to this Topic for all the same reasons it objects to Interrogatory Nos. 2 and 3. Micron further objects to this Topic to the extent it requires a fact witness to testify about legal issues. Micron further objects to this Topic to the extent it seeks information protected by attorney-client privilege, the work-product doctrine, the common-interest privilege, or any other applicable privilege or immunity doctrines. Micron further objects to this Topic to the extent it seeks testimony irrelevant to Micron's Motion to Transfer and is therefore beyond of the scope of permissible venue discovery.

Subject to and without waiving any of the foregoing objections, Micron responds as follows:

Micron will not produce a witness in response to this topic.

**VENUE TOPIC NO. 5**

The location and identity of all evidence relevant to this Litigation in the possession, custody, or control of Defendants or their subsidiaries and affiliates.

**RESPONSE TO VENUE TOPIC NO. 5**

In addition to the foregoing General Objections, Micron objects to this Topic to the extent it requires a fact witness to testify about legal issues. Micron further objects to this Topic to the extent it seeks information protected by attorney-client privilege, the work-product doctrine, the common-interest privilege, or any other applicable privilege or immunity doctrines. Micron further

objects to this Topic to the extent it seeks testimony irrelevant to Micron's Motion to Transfer and is therefore beyond of the scope of permissible venue discovery.

Subject to and without waiving any of the foregoing objections, Micron responds as follows:

Micron will provide one or more witnesses with knowledge of where Micron conducts research, development, design, and manufacture of the Accused Products to the extent such information is relevant to Micron's Motion to Transfer and is non-privileged and not protected by work product immunity.

**VENUE TOPIC NO. 6**

Your distribution network in the United States for the Accused Products, beginning with importation into the United States and concluding with receipt by Your customers, including the location of the Accused Products as they travel through the network from point of entry into the United States to receipt by Your customers, each physical location used in Your distribution network, and all warehouses that You use for storing or distributing the Accused Products.

**RESPONSE TO VENUE TOPIC NO. 6**

In addition to the foregoing General Objections, Micron objects to this Topic for all the same reasons it objects to Interrogatory No. 4 and RFP No. 6. Micron further objects to this Topic to the extent it requires a fact witness to testify about legal issues. Micron further objects to this Topic to the extent it seeks information protected by attorney-client privilege, the work-product doctrine, the common-interest privilege, or any other applicable privilege or immunity doctrines. Micron further objects to this Topic to the extent it seeks testimony irrelevant to Micron's Motion to Transfer and is therefore beyond of the scope of permissible venue discovery.

Subject to and without waiving any of the foregoing objections, Micron responds as follows:

Micron will not produce a witness in response to this topic.

**VENUE TOPIC NO. 7**

The location of any physical samples of the Accused Products or their relevant components.

**RESPONSE TO VENUE TOPIC NO. 7**

In addition to the foregoing General Objections, Micron objects to this Topic for all the same reasons it objects to Interrogatory No. 1 and RFP No. 6. Micron further objects to this Topic to the extent it requires a fact witness to testify about legal issues. Micron further objects to this Topic to the extent it seeks information protected by attorney-client privilege, the work-product doctrine, the common-interest privilege, or any other applicable privilege or immunity doctrines. Micron further objects to this Topic to the extent it seeks testimony irrelevant to Micron's Motion to Transfer and is therefore beyond of the scope of permissible venue discovery.

Subject to and without waiving any of the foregoing objections, Micron responds as follows:

Micron will not produce a witness in response to this topic.

**VENUE TOPIC NO. 8**

Defendants' responses to the venue-related discovery in this Litigation, Defendants' venue briefing (including its declarations) in this Litigation, and Defendants' initial disclosures in this Litigation.

**RESPONSE TO VENUE TOPIC NO. 8**

In addition to the foregoing General Objections, Micron objects to this Topic to the extent it requires a fact witness to testify about legal issues. Micron further objects to this Topic to the extent it seeks information protected by attorney-client privilege, the work-product doctrine, the common-interest privilege, or any other applicable privilege or immunity doctrines. Micron further objects to this Topic to the extent it seeks testimony irrelevant to Micron’s Motion to Transfer and is therefore beyond of the scope of permissible venue discovery.

Subject to and without waiving any of the foregoing objections, Micron responds as follows:

Micron will not produce a witness in response to this topic.

**VENUE TOPIC NO. 9**

Your organizational structure relating to design, manufacture, importation, distribution, marking, and sales of the Accused Products, including the respective business units, teams, leadership, employees, and their locations.

**RESPONSE TO VENUE TOPIC NO. 9**

In addition to the foregoing General Objections, Micron objects to this Topic for all the same reasons it objects to RFP No. 2. Micron further objects to this Topic to the extent it requires a fact witness to testify about legal issues. Micron further objects to this Topic to the extent it seeks information protected by attorney-client privilege, the work-product doctrine, the common-interest privilege, or any other applicable privilege or immunity doctrines. Micron further objects to this Topic to the extent it seeks testimony irrelevant to Micron’s Motion to Transfer and is therefore beyond of the scope of permissible venue discovery.

Subject to and without waiving any of the foregoing objections, Micron responds as follows:

Micron will provide one or more witnesses with knowledge of the research, development, design, and manufacture of the Accused Products to the extent such information is relevant to Micron's Motion to Transfer and is non-privileged and not protected by work product immunity.

**VENUE TOPIC NO. 10**

The identity and location of any evidence related to Your pre-suit awareness of any patent-in-suit, including the identity and location of any individuals with knowledge of such awareness and the identity and location of any documents reflecting such awareness.

**RESPONSE TO VENUE TOPIC NO. 10**

In addition to the foregoing General Objections, Micron objects to this Topic to the extent it requires a fact witness to testify about legal issues. Micron further objects to this Topic to the extent it seeks information protected by attorney-client privilege, the work-product doctrine, the common-interest privilege, or any other applicable privilege or immunity doctrines. Micron further objects to this Topic to the extent it seeks testimony irrelevant to Micron's Motion to Transfer and is therefore beyond of the scope of permissible venue discovery.

Subject to and without waiving any of the foregoing objections, Micron responds as follows:

Micron will not produce a witness in response to this topic.

**FIRST SUPPLEMENTAL RESPONSE TO VENUE TOPIC NO. 10 (JULY 2, 2025)**

Micron incorporates by reference its prior response and objections to this topic. Subject to and without waiving the foregoing objections, Micron further responds as follows:

Micron conducted a reasonable investigation and is unaware of any pre-suit awareness of any patent-in-suit. Micron's investigation is ongoing and Micron reserves the right to supplement its response, should further relevant and responsive information, if any, be located that is not subject to privilege or work product protection.

**VENUE TOPIC NO. 11**

The identity and location(s) of any 1) physical documents and 2) any server(s), data center (s), or other storage locations or media that store electronic documents containing information or data related to the Micron Accused Products, including the location where source code, electronic documents, or other categories of documents are stored, and, for each category of document, identify whether such documents are accessible electronically, and if so, whether there are any geographic restrictions on where such documents may be accessed and whether they can be accessed remotely including but not limited to from the State of Texas, including from the Western District of Texas.

**RESPONSE TO VENUE TOPIC NO. 11**

In addition to the foregoing General Objections, Micron objects to this Topic to the extent it requires a fact witness to testify about legal issues. Micron further objects to this Topic to the extent it seeks information protected by attorney-client privilege, the work-product doctrine, the common-interest privilege, or any other applicable privilege or immunity doctrines. Micron further objects to this Topic to the extent it seeks testimony irrelevant to Micron's Motion to Transfer and is therefore beyond of the scope of permissible venue discovery.

Subject to and without waiving any of the foregoing objections, Micron responds as follows:

Micron will provide one or more witnesses with knowledge of the location(s) of physical documents used by the witness to the extent such information is relevant to Micron's Motion to Transfer and is non-privileged and not protected by work product immunity.

**VENUE TOPIC NO. 12**

The identity of the top ten purchasers of the Accused Products.

**RESPONSE TO VENUE TOPIC NO. 12**

In addition to the foregoing General Objections, Micron objects to this Topic for all the same reasons it objects to Interrogatory No. 5 and RFP No. 8. Micron further objects to this Topic to the extent it requires a fact witness to testify about legal issues. Micron further objects to this Topic to the extent it seeks information protected by attorney-client privilege, the work-product doctrine, the common-interest privilege, or any other applicable privilege or immunity doctrines. Micron further objects to this Topic to the extent it seeks testimony irrelevant to Micron's Motion to Transfer and is therefore beyond of the scope of permissible venue discovery.

Subject to and without waiving any of the foregoing objections, Micron responds as follows:

Micron will not produce a witness in response to this Topic.

**VENUE TOPIC NO. 13**

The identity of the top ten purchasers of the Accused Products in the United States.

**RESPONSE TO VENUE TOPIC NO. 13**

In addition to the foregoing General Objections, Micron objects to this Topic for all the same reasons it objects to Interrogatory No. 5 and RFP No. 8. Micron further objects to this Topic to the extent it requires a fact witness to testify about legal issues. Micron further objects to this Topic to the extent it seeks information protected by attorney-client privilege, the work-product

doctrine, the common-interest privilege, or any other applicable privilege or immunity doctrines. Micron further objects to this Topic to the extent it seeks testimony irrelevant to Micron's Motion to Transfer and is therefore beyond of the scope of permissible venue discovery.

Subject to and without waiving any of the foregoing objections, Micron responds as follows:

Micron will not produce a witness in response to this Topic.

**VENUE TOPIC NO. 14**

The identity and location of any third parties You contend have documents, materials or information relevant to this Litigation, and what documents, materials or information relevant to this Litigation You contend they have.

**RESPONSE TO VENUE TOPIC NO. 14**

In addition to the foregoing General Objections, Micron objects to this Topic to the extent it requires a fact witness to testify about legal issues. Micron further objects to this Topic to the extent it seeks information protected by attorney-client privilege, the work-product doctrine, the common-interest privilege, or any other applicable privilege or immunity doctrines. Micron further objects to this Topic as duplicative of information provided with Micron's Motion to Transfer, such as the identities and locations of third party manufacturers and inventors and prior assignee of the patents-at-issue.

Subject to and without waiving any of the foregoing objections, Micron responds as follows:

Micron will provide one or more witnesses with knowledge of the identity and location of third parties that have documents, materials, or information relevant to the Crucial products accused in this Litigation, and the information they likely possess.

DATED: July 2, 2025

/s/ John Kappos

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*Attorneys for Defendants Micron  
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Semiconductor Products, Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that all counsel of record who have consented to electronic service are being served with a copy of this document via electronic mail on July 2, 2025.

*/s/ John Kappos*  
John Kappos