

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

TAIWAN SEMICONDUCTOR
MANUFACTURING COMPANY LTD. and APPLE INC.
Petitioners

v.

MYW SEMITECH, LLC,
Patent Owner

U.S. Patent No. 11,538,763
Issue Date: December 27, 2022

Title: CHIP PACKAGE

Inter Partes Review No. IPR2026-00066

DECLARATION OF RICHARD JUANG

I, Richard Juang, declare the following:

1. I am an attorney with the firm Daignault Iyer LLP, counsel of record for Patent Owner MYW Semitech, LLC (“Patent Owner”). I submit this Declaration in support of Patent Owner’s Request for Discretionary Denial of Institution of Petition for *Inter Partes* Review.
2. I make this declaration on the basis of my personal knowledge, and if called to testify as a witness, I would and could testify competently here.
3. Attached as **Exhibit 2003** is a true and correct copy of the email chain between myself and Daniel Richards, counsel for Apple Inc. regarding production of materials.
4. Attached as **Exhibit 2005** is a true and correct copy of the email chain between myself and Daniel Richards, counsel for Apple Inc. regarding the production of source code.
5. Attached as **Exhibit 2006** is a true and correct copy of the email chain between myself and Peter Yang, counsel for Taiwan Semiconductor Manufacturing Company LTD regarding the production of source code.
6. Attached as **Exhibit 2009** is a true and correct copy of the email from Taylor Lepore to Apple Inc.’s counsel regarding infringement contentions.

Dated: February 2, 2026

Respectfully submitted,

By: /s/ Richard Juang
Richard Juang (USPTO Reg. No. 41,090)*