

Paper No. \_\_\_\_\_  
Filed: January 8, 2020

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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SAMSUNG ELECTRONICS COMPANY, LTD.  
Petitioner

v.

PROMOS TECHNOLOGIES, INC.,  
Patent Owner

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Case IPR2019-00780  
Patent No. 6,163,492

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**PETITIONER'S NOTICE OF DEPOSITION OF  
ERIK DE LA IGLESIA**

Pursuant to 37 C.F.R. § 42.53, Petitioner Samsung Electronics Company, Ltd. hereby provides notice that it will cross-examine Mr. Erik de la Iglesia, a witness of Patent Owner ProMOS Technologies, Inc., on January 29, 2020. The cross-examination will begin at 9:00 am and will take place at TechKnowledge Law Group LLP, 100 Marine Parkway, Suite 200, Redwood City, CA 94065. Pursuant to the parties' agreement, the cross-examination will be for use in this proceeding, as well as IPR2019-000779 and IPR2019-00781.

The cross-examination will take place before a Notary Public or other officer authorized by law to administer oaths. The cross-examination will be recorded using stenographic and/or audio means.

Dated: January 8, 2020

Respectfully submitted,

/Naveen Modi/  
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Naveen Modi (Reg. No. 46,224)  
Counsel for Petitioner

**CERTIFICATE OF SERVICE**

I hereby certify that on January 8, 2020, a copy of Petitioner's Notice of Deposition of Erik de la Iglesia was served by electronic means, as agreed by the parties, upon Counsel for Patent Owner at the following addresses of record:

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Dated: January 8, 2020

Respectfully submitted,

/Naveen Modi/

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Naveen Modi (Reg. No. 46,224)  
Counsel for Petitioner