

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE


VLSI TECHNOLOGY LLC,	)	
	)	
Plaintiff,	)	
	)	
v.	)	C.A. No. 18-966 (CFC) (CJB)
	)	
INTEL CORPORATION,	)	<b>REDACTED - PUBLIC VERSION</b>
	)	<b>Original Filing Date: December 2, 2022</b>
Defendant.	)	<b>Redacted Filing Date: December 9, 2022</b>


**DECLARATION OF GREGORY LANTIER IN SUPPORT OF INTEL CORPORATION’S SUPPLEMENTAL BRIEF REGARDING DISCLOSURE STATEMENTS REQUIRED BY STANDING ORDER**

I, Gregory Lantier, declare as follows:

1. I am an attorney with the law firm of Wilmer Cutler Pickering Hale & Dorr LLP, counsel for Intel Corporation in the above-captioned matter. I have personal knowledge of the matters stated herein and, if called upon, could competently testify thereto.

2. I have attached to this declaration true and correct copies of the following documents, as cited in the Supplemental Brief:

Exhibit	Description
1	June 3 – June 15, 2022 email chain re: VLSI’s statements in Response to Standing Orders
2	 (Bates No. FORTRESS00001621) (excerpts)

3	Second Amended and Restated Limited Liability Company Agreement of VLSI Technology LLC (Bates No. VLSI-18-966DE00050417) (excerpts)
4	 (Bates No. FORTRESS00050754)
5	Limited Liability Company Agreement of VLSI Technology LLC (Bates No. VLSI-18-966DE00050638)
6	FCO MA LSS LP Form D – Notice of Exempt Offering of Securities
7	FCO MA Centre Street LP Form D – Notice of Exempt Offering of Securities
8	FCO MA MI LP Form D – Notice of Exempt Offering of Securities
9	Schedule Tender Offer form for acquiring Finjan Holdings Inc. (excerpts)
10	Deposition Transcript of Eran Zur, <i>VLSI Tech. LLC v. Intel Corp.</i> , No. 1:19-cv-977-ADA (W.D. Tex.) dated September 26, 2019 (excerpts)

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Executed on December 2, 2022.

/s/ Gregory Lantier

Gregory Lantier

**CERTIFICATE OF SERVICE**

I hereby certify that on December 2, 2022, I caused the foregoing to be electronically filed with the Clerk of the Court using CM/ECF, which will send notification of such filing to all registered participants.

I further certify that I caused copies of the foregoing document to be served on December 2, 2022, upon the following in the manner indicated:

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*/s/ Jeremy A. Tigan*

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Jeremy A. Tigan (#5239)