

Filed on behalf of BeSang Inc.

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UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

MICRON TECHNOLOGY, INC.,
MICRON SEMICONDUCTOR PRODUCTS, INC., and
MICRON TECHNOLOGY TEXAS, LLC,
Petitioners,

v.

BESANG INC.,
Patent Owner.

Case No. IPR2023-00900
U.S. Patent No. 7,378,702

PATENT OWNER'S UPDATED EXHIBIT LIST

Micron Technology v. BeSang Inc.
Patent No. 7,378,702 – IPR2023-00900

Pursuant to 37 C.F.R. § 42.63(e), Patent Owner BeSang Inc. hereby provides
a current list of its exhibits.

Exhibit No.	Description
2001	First Amended Docket Control Order, <i>BeSang Inc. v. Micron Tech., Inc.</i> , Case No. 2:23-cv-00028, Dkt. 54 (E.D. Tex. June 21, 2023)
2002	Docket for <i>BeSang Inc. v. Micron Tech., Inc.</i> , Case No. 2:23-cv-00028 (E.D. Tex.) (as of Aug. 28, 2023)
2003	RESERVED
2004	Defendants’ Patent Local Rule 3-3 Disclosure of Invalidity Contentions, <i>BeSang Inc. v. Micron Tech., Inc.</i> , Case No. 2:23-cv-00028 (E.D. Tex. July 11, 2023) (cover pleading)
2005	Ann S. Mutschler, <i>Stanford, Korean nanofab center, Oregon-based semi startup claim 3D IC breakthrough</i> , EDN (Aug. 13, 2008), https://www.edn.com/stanford-korean-nanofab-center-oregon-based-semi-startup-claim-3d-ic-breakthrough/
2006	Press Release, <i>Micron and Intel Unveil New 3D NAND Flash Memory Technology Advancements Enable Three Times More Capacity than Other NAND Technologies</i> , Intel (Mar. 26, 2015), https://download.intel.com/newsroom/2021/archive/2015-03-26-news-releases-micron-and-intel-unveil-new-3d-nand-flash-memory.pdf
2007	Peter Clarke, <i>EE Times updates list of emerging startups to version 8.0</i> , EE Times (Feb. 2, 2009), https://www.eetimes.com/ee-times-updates-list-of-emerging-startups-to-version-8-0/
2008	<i>Exploring the Potential of Emerging Semiconductor Technology</i> , Global Semiconductor Alliance Forum, Vol. 18, No. 2 (June 2011), https://www.gsaglobal.org/wp-content/uploads/2019/04/201102_GSA_Forum.pdf
2009	<i>Looking Beyond TSV For 3D IC Technology</i> , Frost & Sullivan (Mar. 2009), http://www.growthconsulting.frost.com/web/images.nsf/0/EF8B206A32BBD551652575B4002F3CD5/\$File/TIAlert.htm

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Exhibit No.	Description
2010	Press Release, <i>Micron and Intel Extend their Leadership in 3D NAND Flash memory</i> , Globe News Wire (May 21, 2018), https://www.globenewswire.com/news-release/2018/05/21/1509614/14450/en/Micron-and-Intel-Extend-their-Leadership-in-3D-NAND-Flash-memory.html
2011	Micron Unveils 3D NAND (Mar. 26, 2015), https://www.youtube.com/watch?v=Lo-rsZ0vznw
2012	<i>Radar Scope</i> , Semiconductor Times, Vol. 12, No. 4 (Apr. 2007)
2013	RESERVED
2014	1/29/2007 Email from Peter Feeley to BeSang
2015	7/30/2007 Email exchange between Tom Arnold, Sang-Yun Lee, and others
2016	RESERVED
2017	RESERVED
2018	RESERVED
2019	U.S. District Courts – Combined Civil and Criminal Federal Court Management Statistics (June 30, 2023), https://www.uscourts.gov/statistics-reports/federal-court-management-statistics-june-2023
2020	9/14/2023 Email from Board to Counsel of Record Authorizing Preliminary Reply and Sur-Reply Briefing
2021	Roberto Bez et al., <i>Introduction to Flash Memory</i> , Proceedings of the IEEE, Vol. 91, No. 4 (April 2003)
2022	Executive Summary, <i>International Technology Roadmap for Semiconductors</i> , Semiconductor Industry Ass’n (2003), https://www.semiconductors.org/wp-content/uploads/2018/08/20031_ExecSum.pdf
2023	U.S. Patent No. 6,881,994, Fig. 12B (annotated by Dr. Jack C. Lee)
2024	U.S. Patent No. 6,881,994, Fig. 12B (annotated by Dr. Jack C. Lee)

Exhibit No.	Description
2025	U.S. Patent No. 6,881,994, Fig. 12B (annotated by Dr. Jack C. Lee)
2026	U.S. Patent No. 6,881,994, Fig. 12B (annotated by Dr. Jack C. Lee)
2027	<u>Petitioners' Deposition Exhibit 1034</u> : Perrine Batude, et al., <i>3-D Sequential Integration: A Key Enabling Technology for Heterogeneous Co-Integration of New Function with CMOS</i> , IEEE J. on Emerging & Selected Topics in Circuits and Systems, Vol. 2, No. 4 (Dec. 2012)
2028	Transcript of Deposition of Dr. Jack C. Lee (Feb. 6, 2024)
2029	Declaration of Steven A. Przybylski
2030	CV of Steven A. Przybylski
2031	<i>Webster's New Universal Unabridged Dictionary</i> (Barnes & Noble Publ'g 2003) (excerpt)
2032	<i>Random House Webster's College Dictionary</i> (2d ed. 1997) (excerpt)
2033	Gary S. May, Ph.D. & Costas J. Spanos, Ph.D., <i>Fundamentals of Semiconductor Manufacturing and Process Control</i> (2006) (excerpts)
2034	Brent Keeth et al., <i>DRAM Circuit Design Fundamental and High-Speed Topics</i> (IEEE Press Editorial Board eds., 2008) (excerpts)
2035	Brent Keeth & R. Jacob Baker, <i>DRAM Circuit Design: A Tutorial</i> (Stuart K. Tewksbury & Joe E. Brewer eds., 2001) (excerpts)
2036	Kiyoo Itoh, <i>VLSI Memory Chip Design</i> (Kiyoo Itoh & Takayasu Sakurai eds., 1st ed. 2001) (excerpts)
2037	Interconnect, <i>International Technology Roadmap for Semiconductors</i> , Semiconductor Industry Ass'n (2007), https://www.semiconductors.org/wp-content/uploads/2018/08/2007Interconnect.pdf
2038	2/16/2024 Email from Board to Counsel of Record Denying Patent Owner's Request for Authorization to File a Motion to Strike

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Exhibit No.	Description
2039–2050	RESERVED
2051	[Not Filed] Declaration of Dr. Jack. C. Lee in <i>Western Digital Technologies, Inc. v. Longitude Licensing Ltd.</i> , IPR2023-01123, Exhibit 1003 (P.T.A.B. June 21, 2023)
2052	Transcript of Deposition of Dr. Jack C. Lee (June 12, 2024)
2053	Patent Owner’s Demonstratives for Oral Hearing

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CERTIFICATE OF SERVICE

The undersigned certifies that pursuant to 37 C.F.R. § 42.6(e), a true copy of the foregoing **PATENT OWNER’S UPDATED EXHIBIT LIST** and **EXHIBIT 2053** are being served electronically on August 19, 2024 to the following lead and backup counsel for Petitioners to the following email addresses:

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