

Filed on behalf of BeSang Inc.

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UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

INTEL CORPORATION,
Petitioner,

v.

BESANG INC.,
Patent Owner.

Case No. IPR2023-00991
U.S. Patent No. 7,378,702

PATENT OWNER'S UPDATED EXHIBIT LIST

Intel Corporation v. BeSang Inc.
Patent No. 7,378,702 – IPR2023-00991

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 Sept. 14, 2023)
2003	Docket for <i>BeSang Inc. v. Intel Corp.</i> , Case No. 3:23-cv-00113 (D. Or.) (as of Sept. 14, 2023)
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-intelunveil-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

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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
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	Andy Patrizio, <i>Impact of Intel and Micron ending their NAND partnership is negligible</i> , Network World (Jan. 12, 2018), https://www.networkworld.com/article/3247746/impact-of-intel-and-micron-ending-their-nand-partnership-is-negligible.html
2017	Intel Corporation’s Invalidity Contentions, <i>BeSang Inc. v. Intel Corp.</i> , Case No. 3:23-cv-00113 (D. Or. July 14, 2023) (cover pleading)
2018	USPTO Assignment Abstract of Title for U.S. Patent Application Publication No. 2003/0157748
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	9/22/2023 Email from Board to Counsel of Record Authorizing Preliminary Reply and Sur-Reply Briefing

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Exhibit No.	Description
2021	Intel Corporation’s Motion to Extend Temporary Stay for Three Months, <i>BeSang Inc. v. Intel Corp.</i> , Case No. 3:23-cv-00113, Dkt. 74 (D. Or. Sept. 15, 2023)
2022	Opinion & Order, <i>BeSang Inc. v. Intel Corp.</i> , Case No. 3:23-cv-00113, Dkt. 80 (D. Or. Oct. 10, 2023) (filing authorized by Board on 10/26/2023)
2023	Series Circuit v. Parallel Circuit
2024	Kiyoo Itoh, <i>VLSI Memory Chip Design</i> (Kiyoo Itoh & Takayasu Sakurai eds., 1st ed. 2001) (excerpts)
2025	RESERVED
2026	RESERVED
2027	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	Deposition of Dr. Jack C. Lee, <i>Micron Tech., Inc. v. BeSang Inc.</i> , IPR2023-00900, EX2028 (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	RESERVED
2035	RESERVED
2036	RESERVED
2037	RESERVED
2038	RESERVED

Exhibit No.	Description
2039	Transcript of Deposition of Dr. Carl Sechen (Feb. 27, 2024)
2040	RESERVED
2041	Tetsuo Endoh, et al., <i>Novel Ultrahigh-Density Flash Memory With a Stacked-Surrounding Gate Transistor (S-SGT) Structured Cell</i> , IEEE Transactions on Electron Devices, Vol. 50, No. 4 (Apr. 2003) [Micron Ex. 1022]
2042	Hiroshi Sakuraba, et al., <i>New Three-Dimensional High-Density Stacked-Surrounding Gate Transistor (S-SGT) Flash Memory Architecture Using Self-Aligned Interconnection Fabrication Technology without Photolithography Process for Tera-Bits and Beyond</i> , Japanese J. of Applied Physics, Vol. 43, No. 4B (2004) [Micron Ex. 1030]
2043	U.S. Patent No. 6,982,905 (Nguyen) [Micron Ex. 1012]
2044	G. Groeseneken, et al., Basics of Nonvolatile Semiconductor Memory Devices, in <i>Nonvolatile Semiconductor Memory Technology: A Comprehensive Guide to Understanding and Using NVSM Devices</i> (William D. Brown & Joe Brewer eds., 1997) [Micron Ex. 1009]
2045	Linden T. Harrison, <i>Current Sources & Voltage References</i> (2005) (excerpts)
2046	<i>The Electrical Engineering Handbook</i> (Wai-Kai Chen ed., 2005) (excerpts)
2047	[Not Filed Version of EX2024] Kiyoo Itoh, <i>VLSI Memory Chip Design</i> (Kiyoo Itoh & Takayasu Sakurai eds., 1st ed. 2001)
2048	[Not Filed Version of EX2033] Gary S. May, Ph.D. & Costas J. Spanos, Ph.D., <i>Fundamentals of Semiconductor Manufacturing and Process Control</i> (2006)
2049	[Not Filed Version of EX2045] Linden T. Harrison, <i>Current Sources & Voltage References</i> (2005)
2050	[Not Filed Version of EX2046] <i>The Electrical Engineering Handbook</i> (Wai-Kai Chen ed., 2005)
2051	RESERVED

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Exhibit No.	Description
2052	RESERVED
2053	Transcript of Deposition of Dr. Carl Sechen (July 10, 2024)
2054	Patent Owner’s Demonstratives for Oral Hearing

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Dated: September 13, 2024

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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 **EX2054** are being served electronically on September 13, 2024 to the following lead counsel for Petitioner to the following email addresses:

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