UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

MICRON TECHNOLOGY, INC.,
Petitioner
v.

YANGTZE MEMORY TECHNOLOGIES COMPANY, LTD.,
Patent Owner

Case No.: IPR2024-00789
U.S. Patent No. 10,861,872

PETITIONER'S MOTION FOR ADMISSION *PRO HAC VICE* OF JARED BOBROW PURSUANT TO 37 C.F.R. § 42.10

LISTING OF EXHIBITS

Exhibit	Description
1001	U.S. Patent No. 10,861,872 B2 to Liu et al.
1002	File History of U.S. Patent No. 10,861,872 to Liu et al.
1003	Declaration of Dr. Sanjay Banerjee ("Banerjee")
1004	*Curriculum Vitae* of Dr. Sanjay Banerjee
1005	U.S. Patent No. 9,859,297 B2 to Park et al. ("Park")
1006	U.S. Patent Publ. No. 2019/0081061 A1 to Tessariol et al. ("Tessariol")
1007	Aritome, "NAND Flash Memory Technologies" (2016)
1008	Silvagni, "3D NAND Flash Based on Planar Cells," Computers 2017
1009	Micheloni et al., "Inside Solid State Drives (SSDs)" (2nd Ed. 2018)
1010	U.S. Patent No. 10,381,369 B2 to Kim et al.
1011	U.S. Patent No. 10,475,737 B2 to Tang et al.
1012	Certified English Translation of Chinese Patent Application Publ. No. CN108766971 to Liu ("Liu")
1013	Chinese Patent Application Publ. No. CN108766971 to Liu
1014	U.S. Patent No. 8,945,996 B2 to Tang et al.
1015	YMTC's Exemplary Infringement Claim Chart for U.S. Patent No. 10,861,872 – (Ex. 49) 128L [PROTECTIVE ORDER MATERIAL – FILED UNDER SEAL]
1016	YMTC's Exemplary Infringement Claim Chart for U.S. Patent No. 10,861,872 – (Ex. 50) 176L [PROTECTIVE ORDER MATERIAL – FILED UNDER SEAL]

Exhibit	Description
1017	YMTC's Exemplary Infringement Claim Chart for U.S. Patent No. 10,861,872 – (Ex. 51) 232L [PROTECTIVE ORDER MATERIAL – FILED UNDER SEAL]
1018	Print out from Geographic Wiki, https://www.studycountry.com/wiki/what-is-a-piece-of-land-surrounded-by-water-on-2-side (last visited Mar. 28, 2024)
1019	U.S. Patent No. 9,530,492 to Lee
1020	Minute Order, Dkt. No. 42, dated February 22, 2024 in *Yangtze Memory Technologies Company, Ltd. v. Micron Technology, Inc. and Micron Consumer Products Group, LLC*, Case No. 3:23-cv-05792-RFL
1021	Combined Civil and Criminal Federal Court Management Statistics (December 31, 2023), available at https://www.uscourts.gov/sites/default/files/data_tables/fcms_na_distcomparison1231.2023.pdf
1022	Docket from *Yangtze Memory Technologies Company, Ltd. v. Micron Technology, Inc. and Micron Consumer Products Group, LLC*, Case No. 3:23-cv-05792-RFL
1023	Micheloni, "3D Flash Memories" (2016)
1024	*Intentionally Omitted*
1025	*Intentionally Omitted*
1026	*Intentionally Omitted*
1027	*Intentionally Omitted*
1028	*Intentionally Omitted*
1029	*Intentionally Omitted*
1030	*Intentionally Omitted*

Exhibit	Description
1031	Complaint for Patent Infringement, Dkt. No. 1, filed Nov. 9, 2023, in *Yangtze Memory Technologies Company, Ltd. v. Micron Technology, Inc. and Micron Consumer Products Group, LLC*, Case No. 3:23-cv-05792-RFL
1032	First Amended Complaint for Patent Infringement, Dkt. No. 29, filed Feb. 2, 2024, in *Yangtze Memory Technologies Company, Ltd. v. Micron Technology, Inc. and Micron Consumer Products Group, LLC*, Case No. 3:23-cv-05792-RFL
1033	Plaintiff and Counterclaim Defendant Yangtze Memory Technologies Company, Ltd.'s Disclosure of Asserted Claims and Infringement Contentions, dated May 6, 2024, in *Yangtze Memory Technologies Company, Ltd. v. Micron Technology, Inc. and Micron Consumer Products Group, LLC*, Case No. 3:23-cv-05792-RFL
1034	Declaration of Jared Bobrow in Support of Petitioner's Motion for Admission *Pro Hac Vice*

Pursuant to 37 C.F.R. § 42.10, Petitioner Micron Technology, Inc. ("Micron" or "Petitioner") respectfully requests that the Board admit Jared Bobrow *pro hac vice* in this proceeding.

I. STATEMENT OF FACTS

Pursuant to 37 C.F.R. § 42.10(c), the Board

> *may recognize counsel pro hac vice during a proceeding upon a showing of good cause, subject to the condition that lead counsel be a registered practitioner and to any other conditions as the Board may impose. For example, where the lead counsel is a registered practitioner, a motion to appear pro hac vice by counsel who is not a registered practitioner may be granted upon showing that counsel is an experienced litigating attorney and has an established familiarity with the subject matter at issue in the proceeding.*

The facts, supported by the accompanying Declaration of Jared Bobrow in Support of Petitioner's Motion for Admission *Pro Hac Vice* (Ex. 1034, "Bobrow Declaration"), establish good cause to admit Mr. Bobrow *pro hac vice* in this proceeding

Lead counsel Jeremy Jason Lang is a registered practitioner.

Jared Bobrow is an experienced litigation attorney. Mr. Bobrow has been a litigating attorney for more than 35 years. Bobrow Declaration ¶ 1. Mr. Bobrow has been litigating patent cases for over 33 of those years. *Id.* Mr. Bobrow is a member in good standing of the California State Bar, with no suspensions or disbarments from practice, nor any application for admission to practice denied, nor any sanctions or contempt citations, and is admitted to practice in the United States Court of Appeals for the Federal Circuit, United States Court of Appeals for the Ninth Circuit, United States Court of Appeals for the First Circuit; California State Supreme Court; the United States District Court for the Eastern District of Texas; and the United States District Courts for the Central, Eastern, Northern, and Southern Districts of California. *Id.* ¶¶ 1-4.

Mr. Bobrow has familiarity with the subject matter at issue in this proceeding and in the related district court case: *Yangtze Memory Technologies Co., Ltd. v. Micron Technology, Inc. & Micron Consumer Products Group, LLC*, Case No. 3:23-cv-05792-RFL (N.D. Cal., filed Nov. 9, 2023) in which U.S. Patent No. 10,861,872 was asserted by the Patent Owner. Bobrow Declaration ¶ 9.

Mr. Bobrow has read and will comply with the Office Patent Trial Practice Guide and the Board's Rules for Practice for Trials set forth in part 42 of the C.F.R, and he agrees to be subject to the USPTO Code of Professional Responsibility set

forth in 37 C.F.R. §§ 10.20 *et seq*., and to disciplinary jurisdiction under 37 C.F.R. § 11.19(a). Bobrow Declaration ¶¶ 5-6.

II. ANALYSIS

The facts contained in the Statement of Facts above, and contained in the Bobrow Declaration, establish that there is good cause to admit Mr. Bobrow *pro hac vice* in this proceeding under 37 C.F.R. § 42.10. Lead counsel is a registered practitioner, Mr. Bobrow is an experienced patent litigation attorney, and Mr. Bobrow has familiarity with the subject matter at issue in this proceeding.

III. CONCLUSION

For the foregoing reasons, Petitioner respectfully requests that the Board admit Jared Bobrow *pro hac vice* in this proceeding.

Respectfully submitted,

ORRICK, HERRINGTON & SUTCLIFFE LLP

Dated: June 11, 2024

/Jeremy Jason Lang/

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CERTIFICATE OF SERVICE

The undersigned hereby confirms that the foregoing paper was caused to be served on June 11, 2024 via electronic mail, upon the following attorneys of record for the Patent Owner:

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/*Karen Johnson*/
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