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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

YANGTZE MEMORY TECHNOLOGIES COMPANY, LTD., Plaintiff, v. MICRON TECHNOLOGY, INC., and MICRON CONSUMER PRODUCTS GROUP, LLC, Defendants.	Case No. 3:23-cv-05792-RFL **PLAINTIFF'S AND COUNTERCLAIM DEFENDANTS' PROPOSED CLAIM CONSTRUCTIONS**
MICRON TECHNOLOGY, INC., Counterclaim Plaintiff, v. YANGTZE MEMORY TECHNOLOGIES COMPANY, LTD., and YANGTZE MEMORY TECHNOLOGIES, INC., Counterclaim Defendants.	

Pursuant to the Court's Scheduling Order (Dkt. 85), J. Lin's Standing Order Governing Patent Cases, and Patent L.R. 4-2, Plaintiff and Counterclaim Defendant Yangtze Memory Technologies Company, Ltd. and Counterclaim Defendant Yangtze Memory Technologies, Inc. (collectively, "YMTC") hereby identifies its proposed claim constructions to Defendants Micron Technology, Inc., and Micron Consumer Products Group, LLC (collectively, "Micron").

Discovery and YMTC's investigation is ongoing. YMTC's proposed constructions are based on information that is currently available to YMTC based on its investigation, Micron's productions and discovery responses to date (which are deficient), and the parties' exchange of proposed terms for construction.

YMTC reserves the right, consistent with the Federal Rules of Civil Procedure and the Local Rules of this Court, as well as any other applicable rule, to revise its proposed constructions, as well as its list of proposed claim terms, in view of Micron's proposed constructions or positions Micron takes in this proceeding or elsewhere, including the right to adopt any claim terms or constructions proposed by Micron, and the right to add additional terms if, in view of YMTC's infringement allegations or Micron's invalidity contentions, the parties have further disputes regarding claim scope. *See O2 Micro Int'l Ltd. v. Beyond Innovation Tech. Co.*, 521 F.3d 1351, 1360 (Fed. Cir. 2008). YMTC also reserves the right to modify this disclosure should other terms become relevant. YMTC also reserves the right to modify this disclosure should additional information become available through investigation or discovery. Further, YMTC reserves the right to modify this disclosure once it has reviewed Micron's proposed claim constructions, and in light of arguments made, or positions taken by, Micron as this case proceeds.

In addition, as confirmed with counsel for Micron, the parties previously agreed on the following constructions for the following claim terms, and continue to agree on the following agreed constructions:

Term	Claims	Agreed Construction
"group of the plurality of word lines"	'822 Patent, Claims 1-2, 11-12	"at least one of the plurality of word lines"
"in [a/the] pre-verify stage"	'957 Patent, Claims 1, 4-5	Plain and ordinary meaning

Term	Claims	Agreed Construction
"dielectric structure"	'378 Patent, Claims 1-2, 6-7, 15-17 '806 Patent, Claims 8-9	Plain and ordinary meaning
"dummy channel structure[s]"	'872 Patent, Claims 7-10	Plain and ordinary meaning
"dummy structure"	'996 Patent, Claims 1-2, 11-12	"electrically inoperable structure that mimics a physical property of an operative structure"
"polysilicon"	'903 Patent, Claims 1, 4-5	Plain and ordinary meaning
"in [a/the] verify stage"	'957 Patent, Claims 1, 4-5	Plain and ordinary meaning

YMTC's proposed constructions are further based upon the parties' agreement to these constructions.

Pursuant to Patent L.R. 4-2(b), YMTC may rely upon the testimony (via a declaration and/or by other means) of one or more expert witnesses, including those experts identified in YMTC's December 30, 2024 Identification of Possible Claim Construction Expert Declarants. These experts may testify to provide background regarding the technology at issue in the asserted patents, to address the proper construction of various claim terms in light of the intrinsic and extrinsic evidence, and to otherwise assist the Court in construing the asserted patents. These experts may also testify concerning the structure disclosed in the asserted patents corresponding to any claim elements that Micron contends are governed by 35 U.S.C. § 112(6).

YMTC further reserves the right to introduce expert testimony to rebut Micron's claim construction positions, and any expert testimony introduced by Micron. YMTC may provide rebuttal testimony from one or more experts to demonstrate that YMTC's proposed construction of the proposed claim terms and phrases is consistent with the understanding of individuals of ordinary skill in the art at the relevant time period for the asserted patents. Such "ordinary skill in the art" testimony will address both the general understanding of the relevant terms and phrases in the field of the art, as well as the understanding of such terms and phrases in the context of the specifications and claims of the asserted patents.

In addition, the patents subject to construction are also at issue in ongoing IPR proceedings. In support of its proposed constructions, YMTC further reserves the right to rely on statements made by

Micron, declarations, expert reports, and/or deposition testimony adduced during those IPR proceedings.

YMTC further reserves the right to rely upon as support for its constructions any extrinsic evidence identified by Micron in Micron's Patent L.R. 4-2 disclosures, and any testimony, reports, or declarations from the persons identified by Micron in its December 30, 2024 List of Names of Potential Expert Declarants for Claim Construction Purusant [sic] to Dkt. 141, including exhibits to any such testimony, reports, or declarations.

Subject to the above reservations, YMTC's proposed constructions, and intrinsic and extrinsic evidence supporting those constructions, are attached hereto as Exhibit A. As stated above, YMTC's investigation is ongoing, and YMTC reserves the right to supplement or modify its proposed constructions based on Micron's proposed constructions, the meet and confer process, and based upon subsequent discovery and/or investigation.

Pursuant to Patent L.R. 4-2(c), YMTC is prepared to meet and confer with Micron at a mutually agreeable time and place for the purpose of narrowing the issues and finalizing preparation of a Joint Claim Construction and Prehearing Statement.

Respectfully submitted,

Date: January 8, 2025

By: /s/ *Andrew T. Radsch*

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EXHIBIT A: YMTC'S PROPOSED CONSTRUCTIONS

	Term (Patent)	Proposed By	Proposed Construction	Intrinsic and Extrinsic Evidence[1]
1.	"word line pre-pulse signal" ('822 Patent, Claims 1, 11)	YMTC & Micron	pulse signal to prepare word lines for a programming step	'822, Abstract, 1:15-48, 1:52-55, 1:56-2:27, 3:43-65, 3:66-4:38, 4:39-59, 4:60-65, 5:35-64, 5:65-6:29, 6:30-60, 6:61-7:18, 7:19-36, 7:37-47, Figs. 4-5, Claims 1, 4, 7-11, 14, 16-20. IPR2024-00795, Inst. Dec. at 6-8. Deposition testimony of Dr. David Kuan-Yu Liu dated 12/17/2024 in IPR2024-00795 Ex. 1003 in IPR2024-00795 (Declaration of Dr. Davis Kuan-Yu Liu dated April 9, 2024) Ex. 2020 in IPR2024-00795 *Pulse*, Wiley Electrical and Electronics Engineering Dictionary (2004) (produced as MYM0069175) *Pulse*, IEEE Standard Dictionary (1996) (produced as MYM0069160) *Pulse*, Webster's II New College Dictionary (2001) (produced as MYM0068603) Micron's Preliminary Claim Constructions and Extrinsic Evidence Pursuant to Patent Local Rule 4-2, *Yangtze Memory Technologies Company, Ltd. v. Micron Technology, Inc.*, N.D. Cal. 3:23-cv-05792-RFL (Aug. 5, 2024)

[1] The '378 and '806 patents share the same specification. Where the identified term applies to both the '378 and '806 patents, YMTC's identification of support from the '378 specification and figures also includes corresponding support from the '806 patent.

	Term (Patent)	Proposed By	Proposed Construction	Intrinsic and Extrinsic Evidence[1]
				Testimony from one or more of YMTC's declarants, including Drs. Min, Przybylski, Kuhn, Yang, Campbell, Giapis, and/or Khatri. Statements from Micron, and deposition testimony and/or declaration statements from Micron's declarants in related IPR proceedings.
2.	"dielectric trenches" ('623 Patent, Claims 1-4, 8-9)	Micron	Plain and ordinary meaning	'623, Abstract, 1:61-2:45, 3:30-65, 4:35-37, 7:17-58, 7:67-8:3, 8:65-9:57, 11:37-12:12, 12:62-13:38, 14:62-66, 15:58-16:30, 17:31-18:9, 19:1-5, 20:9-27, 21:10-33, 12:45-54, , 22:6-18, 22:40-43, 23:12-15, 23:26-33, Figs. 1A-B, 2, 3A, 5A, 5C, 6, 7A, 8A, 8C, 9A-B, 10A-B, 11A-C, 12, Claims 1-4, 8-11. Deposition testimony of Dr. Lee dated 12/19/2024 in IPR2024-00794. Ex. 1003 in IPR2024-00794 (Declaration of Dr. Jack C. Lee dated April 11, 2024). Testimony from one or more of YMTC's declarants, including Drs. Min, Przybylski, Kuhn, Yang, Campbell, Giapis, and/or Khatri. Statements from Micron, and deposition testimony and/or declaration statements from Micron's declarants in related IPR proceedings.
3.	"dummy source structure[s]" ('872 Patent, Claims 1-6, 9, 11-13)	YMTC & Micron	Plain and ordinary meaning, i.e., a structure that does not function as a source	'872, Abstract, 1:39-54, 4:30-33, 5:21-58, 6:31-59, 7:9-8:53, 11:34-60, 13:55-64, 16:14-49, 16:63-17:3; Figs. 1A-D, 2A-L, 3-5; Claims 1-20. '872FH, 05/21/2020 Office Action Summary, pp. 2-4. '872FH, 05/22/2020 Response To Restriction Requirement, pp. 1-2. '872FH, 06/11/2020 Office Action Summary, pp. 3, 9-10.

	Term (Patent)	Proposed By	Proposed Construction	Intrinsic and Extrinsic Evidence[1]
				'872FH, 08/18/2020 Amendments to the Claims, pp. 2-3, 5-8. '872FH, 10/26/2020 Notice of Allowability, pp. 2-4. IPR2024-00789, Inst. Dec. pp. 7-13. Deposition testimony of Dr. Banerjee dated 12/18/2024 in IPR2024-00789. Ex. 1003 in IPR2024-00789 (Declaration of Dr. Sanjay Banerjee dated April 17, 2024). Testimony from one or more of YMTC's declarants, including Drs. Min, Przybylski, Kuhn, Yang, Campbell, Giapis, and/or Khatri. Statements from Micron, and deposition testimony and/or declaration statements from Micron's declarants in related IPR proceedings.
4.	"conductive contact" ('872 Patent, Claims 1-13)	Micron	Plain and ordinary meaning	'872, 5:37-47, Claims 1, 13-14. '872FH, 08/18/2020 Amendments to the Claims, pp. 2-3, 5-8 '872FH, 10/17/2020 Notice of Allowability, pp. 2-4. Shur, "Introduction to Electronic Devices" (1996); Streetman, "Solid State Electronic Devices" (1995); US Patent No. 8,766,336. Deposition testimony of Dr. Banerjee dated 12/18/2024 in IPR2024-00789. Ex. 1003 in IPR2024-00789 (Declaration of Dr. Sanjay Banerjee dated April 17, 2024).

	Term (Patent)	Proposed By	Proposed Construction	Intrinsic and Extrinsic Evidence[1]
				Testimony from one or more of YMTC's declarants, including Drs. Min, Przybylski, Kuhn, Yang, Campbell, Giapis, and/or Khatri. Statements from Micron, and deposition testimony and/or declaration statements from Micron's declarants in related IPR proceedings.
5.	"epitaxial layer" ('378 Patent, Claims 1, 18)	Micron	Plain and ordinary meaning	'378, 9:31-48, 20:38-48, Figs. 2, 6-13; Claims 1, 18. Testimony from one or more of YMTC's declarants, including Drs. Min, Przybylski, Kuhn, Yang, Campbell, Giapis, and/or Khatri. Statements from Micron, and deposition testimony and/or declaration statements from Micron's declarants in related IPR proceedings.
6.	"one or more contact layers on the one or more TACs, the one or more channel structures, and the slit structures" ('378 Patent, Claim 1)	Micron	Plain and ordinary meaning, where "on" not only means "directly on" something but also includes the meaning of "on" something with an intermediate feature or a layer therebetween	'378, 1:56-63, 2:9-21, 2:33-51, 2:52-58, 2:59-62, 2:63-3:3, 4:20-29, 4:51-5:10, 11:48-59, 19:4-24, 19:25-34, 19:35-54, 19:55-67, 20:49-55, 22:4-19; Figs. 2, 7-13; Claim 1. '806, Claim 1. Ex. 1003 in IPR2024-00788 (Declaration of Dr. Jack C. Lee dated April 30, 2024). Testimony from one or more of YMTC's declarants, including Drs. Min, Przybylski, Kuhn, Yang, Campbell, Giapis, and/or Khatri. Statements from Micron, and deposition testimony and/or declaration statements from Micron's declarants in related IPR proceedings.
7.	"local contacts disposed on the channel	Micron	Plain and ordinary meaning, where "on" not only means "directly	'378, 4:20-29, 11:16-30, 11:31-47, 11:48-59, 11:60-64, 12:4-19, 17:7-22, 17:23-43, 17:44-57, 17:58-18:7, 18:8-26, 18:27-41, 18:42-58, 18:59-19:3, 19:4-24, 19:25-34, 19:55-67, 20:1-8; Figs. 2, 7-13; Claims 9, 15, 18.

	Term (Patent)	Proposed By	Proposed Construction	Intrinsic and Extrinsic Evidence[1]
	structures and the slit structures" ('378 Patent, Claim 15)		on" something but also includes the meaning of "on" something with an intermediate feature or a layer therebetween	'806, Claims 8, 10. '378FH, 12/23/2019 Reply to Office Action, p. 8. '378FH, 01/13/2020 Notice of Allowance, pp. 2-3. Ex. 1003 in IPR2024-00788 (Declaration of Dr. Jack C. Lee dated April 30, 2024). Testimony from one or more of YMTC's declarants, including Drs. Min, Przybylski, Kuhn, Yang, Campbell, Giapis, and/or Khatri. Statements from Micron, and deposition testimony and/or declaration statements from Micron's declarants in related IPR proceedings.
8.	"local contacts disposed on the first and second channel structures and the slit structures" ('806 Patent, Claim 8)	Micron	Plain and ordinary meaning, where "on" not only means "directly on" something but also includes the meaning of "on" something with an intermediate feature or a layer therebetween	'378, Claims 9, 15, 18. '806, 4:26-35, 11:20-34, 11:35-50, 11:51-62, 11:63-67, 12:8-23, 17:11-27, 17:28-48, 17:49-62, 17:63-18:12, 18:13-31, 18:32-46, 18:47-63, 18:66-19:8, 19:9-28, 19:29-38, 19:59-20:4, 20:5-12; Figs. 2, 7-13; Claims 8, 10, 13. '378FH, 12/23/2019 Reply to Office Action, p. 8 '378FH, 01/13/2020 Notice of Allowance, pp. 2-3 Ex. 1003 in IPR2024-00791 (Declaration of Dr. Jack C. Lee dated May 2, 2024). Testimony from one or more of YMTC's declarants, including Drs. Min, Przybylski, Kuhn, Yang, Campbell, Giapis, and/or Khatri.

	Term (Patent)	Proposed By	Proposed Construction	Intrinsic and Extrinsic Evidence[1]
				Statements from Micron, and deposition testimony and/or declaration statements from Micron's declarants in related IPR proceedings.
9.	"from bottom to top" ('941 Patent, Claims 1, 2, 5, 7, 11, and 12)	YMTC	Plain and ordinary meaning, i.e., from lowest to highest	'941 Patent at 1:26-41, 2:1-11, 2:13-27, 2:63-3:3, 3:22-30, 3:42-52, 3:53-58, 4:6-28, 4:29-36, 4:62-67, 5:1-14, 5:24-37, 5:42-50, 5:51-55, 5:56-62, 6:55-7:9, 7:23-34, 7:39-46, 8:15-40, Figs. 1-13 (and corresponding written description of cited figures), Claims 1, 2, 5, 7, 11, 12. Merriam Webster Dictionary, 2016. Testimony from one or more of YMTC's declarants, including Drs. Min, Przybylski, Kuhn, Yang, Campbell, Giapis, and/or Khatri. Statements from Micron, and deposition testimony and/or declaration statements from Micron's declarants in related IPR proceedings.
10.	"dielectric pair[s]" ('604 Patent, Claims 1, 3, and 11)	Micron	Plain and ordinary meaning	'604 Patent at Abst., 1:50-52, 2:6-7, 5:27-30,18:36-37, 18:50-52, 19:14-16, 19:30-31, 19:35-37, 20:4-6, 20:21-23, 20:55-57, Figs. 3A-3B, Figs. 4A-4F (and corresponding written description of cited figures), Claims 1, 3, 11. Wiley Electrical and Electronics Engineering Dictionary, 2004. Testimony from one or more of YMTC's declarants, including Drs. Min, Przybylski, Kuhn, Yang, Campbell, Giapis, and/or Khatri. Statements from Micron, and deposition testimony and/or declaration statements from Micron's declarants in related IPR proceedings.
11.	"[at a/of the] same level" ('604	Micron	Plain and ordinary meaning	'604 Patent at 1:52-55, 2:12-15, 2:27-30, 10:60-62, 13:47-51, 18:37-41, 19:23-26, 20:11-14, 20:66-21:2, Claims 1, 9, 15.

	Term (Patent)	Proposed By	Proposed Construction	Intrinsic and Extrinsic Evidence[1]
	Patent, Claims 1, 9, and 15)			3/21/2022 Office Action Summary for U.S. Application No. 16/944,835 4/21/2022 Notice of Allowability for U.S. Application No. 16/944,835 Oxford American Dictionary, 2003. Collins English Dictionary, 2019. Testimony from one or more of YMTC's declarants, including Drs. Min, Przybylski, Kuhn, Yang, Campbell, Giapis, and/or Khatri. Statements from Micron, and deposition testimony and/or declaration statements from Micron's declarants in related IPR proceedings.
12.	"adjacent to" ('164 Patent, Claims 1, 6, 8, and 12)	Micron	Plain and ordinary meaning	'164 Patent at Abst., 1:57-62, 2:58-60, 3:27-60, 5:15-29, 5:42-54, 6:2-6:20, 6:32-47, Fig. 2, Fig. 3 (and corresponding written description of cited figures), Claims 1, 6, 8, and 12. Merriam-Webster Dictionary, 2016. Testimony from one or more of YMTC's declarants, including Drs. Min, Przybylski, Kuhn, Yang, Campbell, Giapis, and/or Khatri. Statements from Micron, and deposition testimony and/or declaration statements from Micron's declarants in related IPR proceedings.
13.	"high-k dielectric" ('711 Patent, Claims 1, 2, 5, 11-13, 16, and 18-19; '276	Micron	Dielectric with a high dielectric constant	'711 Patent at 1:59-2:35, 4: 37-57, 8:10-14, 8:65-9:4, 9:5-11, 10:56-11:3, 11:4-12, Fig. 5B, Fig. 8A, Fig. 8B, Fig. 9A, Fig. 9B (and corresponding written description of cited figures), Claims 1, 2, 5, 11-13, 16, 18-19.

	Term (Patent)	Proposed By	Proposed Construction	Intrinsic and Extrinsic Evidence[1]
	Patent, Claims 1, 5, and 13-14)			'276 Patent at 1:65-2:42; 4:44-64; 8:16-20; 9:4-10; 9:11-17; 10:60-11:7; 11:8-16, Fig. 5B, Fig. 8A, Fig. 8B, Fig. 9A, Fig. 9B (and corresponding written description of cited figures), Claims 1, 5, 13-14. US 2017/0236836 at [0004], [0006], [0033]. US 2013/0313627 at [0025], [0028], [0033], Figs. 1A-1B, Figs. 2A-2B. US 2012/0070944 at [0064], [0151]. US 2005/0287759 at [0004]. US 2006/022337 at [0024]. US 2010/0176442 at [0024]. US 2015/0206757 at [0028]. US 2011/0031554 at [0004]. US 2017/0053915 at [0041]. US 6,514,808 at 2:41-44. US 2015/0311303 at [0003]. US 2014/0353589 at [0026]. US 2006/0273411 at [0015]. US 2006/0131672 at [0025].

	Term (Patent)	Proposed By	Proposed Construction	Intrinsic and Extrinsic Evidence[1]
				US 2006/0131675 at [0032]. High-K thin films as dielectric transducers for flexural M/NEMS resonators, 2016. Oxford Dictionary of Electronics, 2018. Merriam-Webster Dictionary, 2016. CMOS VLSI Design A Circuits and Systems Perspective, 2006. Intel Glossary, 2007. Wiley Electrical and Electronics Engineering Dictionary, 2004. IEEE The Authoritative Dictionary of IEEE Standard Terms, 2000. Semiconductor Glossary, 2017. Testimony from one or more of YMTC's declarants, including Drs. Min, Przybylski, Kuhn, Yang, Campbell, Giapis, and/or Khatri. Statements from Micron, and deposition testimony and/or declaration statements from Micron's declarants in related IPR proceedings.
14.	"buried into the substrate" ('322 Patent, Claims 1, 8, and 14)	Micron	Plain and ordinary meaning	'322 Patent at 8:30-46, Fig. 1, Figs. 3A-3F, Figs. 4A-4C (and corresponding written description of cited figures), Claims 1, 8, 14. Oxford Dictionary of Electronics, 2018. Merriam-Webster Dictionary, 2016.

	Term (Patent)	Proposed By	Proposed Construction	Intrinsic and Extrinsic Evidence[1]
				IEEE Standards Dictionary. Merriam-Webster's Collegiate Dictionary, 2014. Testimony from one or more of YMTC's declarants, including Drs. Min, Przybylski, Kuhn, Yang, Campbell, Giapis, and/or Khatri. Statements from Micron, and deposition testimony and/or declaration statements from Micron's declarants in related IPR proceedings.
15.	"forming a first storage layer on the surface of the first tunneling layer" ('291 Patent, Claim 4)	Micron	Plain and ordinary meaning	'291 Patent at 2:11-29, 10:44-59, 18:39-59, 27:44-59, 34:63-16, Fig. 3, Fig. 26, Fig. 53, Fig. 77 (and corresponding written description of cited figures), Claim 4. Testimony from one or more of YMTC's declarants, including Drs. Min, Przybylski, Kuhn, Yang, Campbell, Giapis, and/or Khatri. Statements from Micron, and deposition testimony and/or declaration statements from Micron's declarants in related IPR proceedings.
16.	"a first conductive material" ('666 Patent, Claim 20 and '838 Patent, Claims 7 and 17)	Micron	Plain and ordinary meaning	'666 Patent at 1:55-67, 2:48-57, 9:35-46, 10:63-11:12, Figs. 7-9 (and corresponding written description of cited figures), Claim 20. '838 patent at 1:40-2:4, 2:48-59, 9:40-51, 10:61-11:17, Figs. 7-9 (and corresponding written description of cited figures), Claims 7, 17. Testimony from one or more of YMTC's declarants, including Drs. Min, Przybylski, Kuhn, Yang, Campbell, Giapis, and/or Khatri. Statements from Micron, and deposition testimony and/or declaration statements from Micron's declarants in related IPR proceedings.

EXHIBIT A: YMTC'S PROPOSED CONSTRUCTIONS

	Term (Patent)	Proposed By	Proposed Construction	Intrinsic and Extrinsic Evidence[1]
17.	"a second conductive material" ('666 Patent, Claim 20, and '838 Patent, Claims 7 and 17)	Micron	Plain and ordinary meaning	'666 Patent at 1:55-67, 2:48-57, 9:35-46, 10:63-11:12, Figs. 7-9 (and corresponding written description of cited figures), Claim 20. '838 patent at 1:40-2:4, 2:48-59, 9:40-51, 10:61-11:17, Figs. 7-9 (and corresponding written description of cited figures), Claims 7, 17. Testimony from one or more of YMTC's declarants, including Drs. Min, Przybylski, Kuhn, Yang, Campbell, Giapis, and/or Khatri. Statements from Micron, and deposition testimony and/or declaration statements from Micron's declarants in related IPR proceedings.
18.	"a cavity of the [first/second] control gate" ('903 Patent, Claim 1)	YMTC	a hole with a larger diameter than holes in the layers immediately above and below the [first/second] control gate	'903, 4:49-5:3, 7:26-8:50, 12:52-64, Figs. 3-4, 11-16, 18, 20-29, 31, 38, Claims 1, 10, 17. Testimony from one or more of YMTC's declarants, including Drs. Min, Przybylski, Kuhn, Yang, Campbell, Giapis, and/or Khatri. Statements from Micron, and deposition testimony and/or declaration statements from Micron's declarants in related IPR proceedings.
19.	"a [first/second/third /fourth] cavity of the [first/second] control gate." ('903 Patent, Claim 17)	YMTC	a [first/second/third/ fourth] hole with a larger diameter than holes in the layers immediately above and below the [first/second] control gate	'903, 4:49-5:3, 7:26-8:50, 12:52-64, Figs. 3-4, 11-16, 18, 20-29, 31, 38, Claims 1, 10, 17. Testimony from one or more of YMTC's declarants, including Drs. Min, Przybylski, Kuhn, Yang, Campbell, Giapis, and/or Khatri. Statements from Micron, and deposition testimony and/or declaration statements from Micron's declarants in related IPR proceedings.

EXHIBIT A: YMTC'S PROPOSED CONSTRUCTIONS

CERTIFICATE OF SERVICE

I hereby certify that this document is being served upon counsel of record for YMTC on January 8, 2025, via electronic service.

/s/ Drago Gregov
Drago Gregov