

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 IPR2024-00789

Patent 10,861,872

**DECLARATION OF ANDREW RADSCH IN SUPPORT OF MOTION FOR
PRO HAC VICE ADMISSION**

I, Andrew Radsch, being duly sworn and upon oath, hereby attest to the following:

1. I am a member in good standing of the Bars of California and New York.
2. I have never been suspended or disbarred from practice before any court or administrative body.
3. I have never been denied an application for admission to practice before any court or administrative body.
4. In the last three (3) years, I have previously applied to appear pro hac vice before the Office in these proceedings:

IPR2022-00182 (filed 08/03/22 (Paper 17), granted 08/12/22 (Paper 23));

IPR2023-01329 (filed 9/20/2023 (Paper 7), granted 10/10/23 (Paper 9));

IPR2023-01353 (filed 9/28/2023 (Paper 7), granted 11/06/2023 (Paper 9)).
5. No sanction or contempt citation has ever been imposed against me by any court or administrative body.
6. I have read and will comply with the Office Patent Trial Practice Guide and the Board's Rules of Practice for Trials set forth in 37 C.F.R. Part 42.

7. I will be subject to the USPTO Rules of Professional Conduct set forth in 37 C.F.R. §§ 11.101 *et seq.* and disciplinary jurisdiction under 37 C.F.R. § 11.19(a).
8. I am an experienced litigation attorney having familiarity with the subject matter at issue in this proceeding. I have been practicing law since 2006 and have extensive experience litigating patent infringement cases in many different District Courts across the country and the International Trade Commission, including drafting briefs before the Court, including in connection with *Markman* hearings, performing validity and infringement analyses, overseeing all aspects of claim construction, conducting discovery investigations, managing expert witnesses, and taking and defending depositions. Many of the cases that I have litigated have involved the kinds of technologies at issue in this case. I am familiar with U.S. Patent No. 10,861,872 and the issues involved in this case. Patent Owner has requested that I represent it in these proceedings.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 9th day of July 2025, in Palo Alto, California.

By: /Andrew Radsch/
Name: Andrew Radsch
ROPES & GRAY LLP