

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
Issue Date: December 8, 2020

Title: THREE-DIMENSIONAL MEMORY DEVICE AND METHOD
FOR FORMING THE SAME

PETITIONER'S UPDATED EXHIBIT LIST

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	<i>Curriculum Vitae</i> 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)” (2 nd 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 <i>Yangtze Memory Technologies Company, Ltd. v. Micron Technology, Inc. and Micron Consumer Products Group, LLC</i> , 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 <i>Yangtze Memory Technologies Company, Ltd. v. Micron Technology, Inc. and Micron Consumer Products Group, LLC</i> , Case No. 3:23-cv-05792-RFL
1023	Micheloni, “3D Flash Memories” (2016)
1024	<i>Intentionally Omitted</i>
1025	<i>Intentionally Omitted</i>
1026	<i>Intentionally Omitted</i>
1027	<i>Intentionally Omitted</i>
1028	<i>Intentionally Omitted</i>
1029	<i>Intentionally Omitted</i>
1030	<i>Intentionally Omitted</i>

Exhibit	Description
1031	Complaint for Patent Infringement, Dkt. No. 1, filed Nov. 9, 2023, in <i>Yangtze Memory Technologies Company, Ltd. v. Micron Technology, Inc. and Micron Consumer Products Group, LLC</i> , Case No. 3:23-cv-05792-RFL
1032	First Amended Complaint for Patent Infringement, Dkt. No. 29, filed Feb. 2, 2024, in <i>Yangtze Memory Technologies Company, Ltd. v. Micron Technology, Inc. and Micron Consumer Products Group, LLC</i> , 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 <i>Yangtze Memory Technologies Company, Ltd. v. Micron Technology, Inc. and Micron Consumer Products Group, LLC</i> , Case No. 3:23-cv-05792-RFL
1034	Declaration of Jared Bobrow in Support of Petitioner’s Motion for Admission <i>Pro Hac Vice</i>
1035	Reply Declaration of Dr. Sanjay Banerjee (“Banerjee-Reply”)
1036	Joint Claim Construction and Prehearing Statement (Patent Local Rule 4-3), Dkt. No. 105, in <i>Yangtze Memory Technologies Company, Ltd. v. Micron Technology, Inc. and Micron Consumer Products Group, LLC</i> , Case No. 3:23-cv-05792-RFL
1037	U.S. Patent No. 10,559,583 B2 to Park et al., bearing production numbers MYM0084362 - MYM0084410
1038	U.S. Patent No. 9,893,082 B2 to Kim et al., bearing production numbers MYM0069093 - MYM0069154
1039	U.S. Patent No. 11,335,807 B2 to Mehandru et al., bearing production numbers MYM0092210 - MYM0092240
1040	U.S. Patent No. 10,431,686 B1 to Yang et al., bearing production numbers MYM0092241 - MYM0092267

Exhibit	Description
1041	Transcript of the deposition of Dr. Kelin Kuhn, dated March 28, 2025, in IPR2024-00789, concerning U.S. Patent No. 10,861,872
1042	Deposition Exhibit 6 from the deposition of Dr. Kelin Kuhn, dated March 28, 2025, in IPR2024-00789, concerning U.S. Patent No. 10,861,872
1043	Petitioner's Hearing Demonstratives

Respectfully submitted,

ORRICK, HERRINGTON & SUTCLIFFE LLP

Dated: July 24, 2025

/Jeremy Jason Lang/

Jeremy Jason Lang
Lead Counsel for Petitioner
Reg. No. 73,064
Jared Bobrow (admitted *Pro Hac Vice*)
1000 Marsh Road
Menlo Park, CA 94025-1015
T: (650) 614-7400
F: (650) 614-7401
Email: PTABDocketJL2@orrick.com
Email: PTABDocketJ3B3@orrick.com

K. Patrick Herman
Reg. No. 75,018
51 West 52nd Street
New York, NY 10019
T: (212) 506-5000
F: (212) 506-5151
Email: P52PTABDocket@orrick.com

*Attorneys for Petitioner Micron Technology,
Inc.*

CERTIFICATE OF SERVICE

The undersigned hereby confirms that the foregoing Petitioner's Hearing Demonstratives were caused to be served on July 24, 2025 via electronic mail, upon the following attorneys of record for the Patent Owner:

James L. Davis (James.L.Davis@ropesgray.com)
Andrew T. Radsch (andrew.radsch@ropesgray.com)
Christopher M. Bonny (Christopher.Bonny@ropesgray.com)
Allen S. Cross (allen.cross@ropesgray.com)
YMTC-Micron-IPRs-Ropes-Service@ropesgray.com

/Karen Johnson/

Karen Johnson