

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 IPR2024-00790
Patent 10,868,031

**PATENT OWNER'S UNOPPOSED MOTION FOR *PRO HAC VICE*
ADMISSION OF ANDREW RADSCH**

LIST OF EXHIBITS

Exhibit	Description
Ex. 2001	New Oxford American Dictionary, 3 rd Ed., 2010
Ex. 2002	The American Heritage® College Dictionary, 3 rd Ed., 2000
Ex. 2003	Webster’s II New College Dictionary, 3 rd Ed., 2005
Ex. 2004	Merriam-Webster’s Dictionary and Thesaurus, 5 th Printing, 2014
Ex. 2005	Declaration of Jonathan Bradford
Ex. 2006	Deposition Transcript of Dr. Banerjee
Ex. 2007	Micron’s Preliminary Claim Constructions (District Court)
Ex. 2008	Plaintiff’s Proposed Claim Constructions (District Court)
Ex. 2009	Gosset, “General review of issues and perspectives for advanced copper interconnections using air-gaps as ultra-low K material” (2003)
Ex. 2010	Harada, “Extremely Low Keff (1.9) Cu Interconnects with Air Gap Formed Using SiOC” (2007)
Ex. 2011	Ashby, Michael, “Materials Selection in Mechanical Design, Chapter 4, Material Property Charts” (4 th Ed. 2011)
Ex. 2012	Nitta, “Performance and reliability of airgaps for advanced BEOL Interconnects” (2008)
Ex. 2013	January 17, 2025, Declaration of Dr. Kuhn (“KuhnII”)
Ex. 2014	Electrical Conductivity, Wolfram Research
Ex. 2015	Young’s Modulus, Wolfram Research
Ex. 2016	Thermal Expansion Coefficients, Wolfram Research
Ex. 2017	Declaration Of Andrew Radsch In Support Of Motion For <i>Pro Hac Vice</i> Admission

Yangtze Memory Technologies Company, Ltd. (“Patent Owner”), respectfully requests *pro hac vice* admission of Andrew Radsch as counsel in this proceeding.

I. BACKGROUND

Patent Owner files this Motion for Admission *Pro Hac Vice* in accordance with the Notice of Filing Date Accorded to Petition and Time for Filing Patent Owner Preliminary Response mailed April 29, 2024, and in accordance with 37 C.F.R. § 42.10(c) and the Order – Authorizing Motion for *Pro Hac Vice* Admission in Case IPR2013-00639, Paper 7.

II. THE CONDITIONS FOR PRO HAC VICE ADMISSION ARE MET HERE

The conditions outlined in 37 C.F.R. § 42.10(c) and the Order – Authorizing Motion for *Pro Hac Vice* Admission in Case IPR2013-00639, Paper 7 are met here.

First, Lead Counsel for Patent Owner (James L. Davis, Jr., Reg. No 57,325) is registered to practice before the Board. See 37 C.F.R. § 41.10(c).

Second, good cause exists to permit Mr. Radsch to be admitted *pro hac vice* for this matter. *See id.* Mr. Radsch has established familiarity with the subject matter at issue in this proceeding, including extensive knowledge of the printed prior art submitted in the instant Petition and related matters. *See id.* Mr. Radsch is

an experienced litigation attorney and has an established familiarity with the subject matter at issue in this proceeding. Mr. Radsch has been practicing law since 2006 and has extensive experience litigating patent infringement cases in many jurisdictions, including District Courts across the country and the International Trade Commission. Among his experience in patent litigation matters, Mr. Radsch has been involved in drafting briefs before the Court, including Markman hearings, performing validity and infringement analyses, overseeing all aspects of claim construction, conducting discovery investigations, managing expert witnesses, and taking and defending depositions.

Mr. Radsch is familiar with U.S. Patent 10,868,031 and the issues involved in this case. Patent Owner Yangtze Memory Technologies Co. Ltd. has requested Mr. Radsch represent it in these proceedings. Counsel for Petitioner does not oppose Mr. Radsch appearing *pro hac vice* during this proceeding.

III. AFFIDAVIT OR DECLARATION OF INDIVIDUAL SEEKING TO APPEAR

Patent Owner's Unopposed Motion for *Pro Hac Vice* Admission is accompanied by an Affidavit of Mr. Radsch.

V. CONCLUSION

Therefore, Patent Owner respectfully requests that the Board recognize Mr. Radsch as counsel *pro hac vice* during this proceeding.

Respectfully submitted,

Dated: July 9, 2025

By: /James L. Davis, Jr./
James L. Davis, Jr.
Registration No. 57,325

Counsel for Yangtze Memory
Technologies Co. Ltd.

CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing PATENT OWNER'S UNOPPOSED MOTION FOR *PRO HAC VICE* ADMISSION OF ANDREW RADSCH and EXHIBIT 2017 was served in its entirety by filing through the Patent Trial and Appeal Case Tracking System (P-TACTS), as well as providing a courtesy copy via e-mail to the following attorneys of record for Petitioner listed below:

Lead Counsel	Back-up Counsel
Jeremy Jason Lang Registration No. 73,604 (jjlang@orrick.com) Postal & Hand-Delivery Address: Orrick, Herrington & Sutcliffe LLP 51 West 52nd Street New York, NY 10019 T: 212-506-5000; F: 212-506-5151 P52PTABDocket@orrick.com PTABDocketJJL2@orrick.com PTABDocketJ3B3@orrick.com micron-ymtc_ohs@orrick.com	Jared Bobrow <i>Pro Hac Vice</i> (jbobrow@orrick.com) K. Patrick Herman Registration No. 75,018 (pherman@orrick.com)
<i>Counsel for Petitioner Micron Technology, Inc.</i>	

Dated: July 9, 2025

By: /Jonathan Bradford/
Name: Jonathan Bradford

ROPES & GRAY LLP