

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 IPR2024-00792
Patent 11,468,957

**DECLARATION OF JONATHAN BRADFORD
IN SUPPORT OF PATENT OWNER'S RESPONSE**

1. I, Jonathan Bradford, make the following Declaration pursuant to 28 U.S.C. § 1746: I am a Senior IP Paralegal at the law firm of Ropes & Gray LLP.

2. I provide this Declaration in connection with the above-identified *Inter Partes* Review proceeding that is before the United States Patent and Trademark Office (“USPTO”). Unless otherwise stated, the facts stated in this Declaration are based on my personal knowledge.

3. Ex. 2004 is a true and correct copy of U.S. 2024/0295960 (“Li”), which was obtained from the USPTO’s Patent Center system. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

4. Ex. 2005 is a true and correct copy of U.S. 2023/0343398 (“Dong”), which was obtained from the USPTO’s Patent Center system. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

5. Ex. 2006 is a true and correct copy of Transcript of December 17, 2024 Deposition of Dr. Liu for IPR2024-00795 in Connection with Patent U.S. 11,501,822 (“Liu822 Tr.”), which was obtained at my direction. This document has been marked with an exhibit label and page numbers on each page at the

bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

6. Ex. 2007 is a true and correct copy of U.S. 10,726,920 (“Yang”), which was obtained from the USPTO’s Patent Center system. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

7. Certain pages have been resized to 8.5 x 11 inches. No content was removed by this resizing.

8. I hereby declare that all statements made herein of my own knowledge are true and that all statements made on information and belief are believed to be true; and further that these statements were made with the knowledge that willful false statements and the like so made are punishable by fine or imprisonment, or both, under 18 U.S.C. § 1001. If called to testify as to the truth of the matters stated herein, I could and would testify competently.

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

Executed this 31st day of January, 2025, in Boston, Massachusetts.

/Jonathan Bradford/
Jonathan Bradford
ROPES & GRAY LLP