

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.: IPR2024-00792
U.S. Patent No. 11,468,957

PETITIONER'S OBJECTIONS TO EVIDENCE

Pursuant to 37 C.F.R. § 42.64(b)(1), Petitioner submits the following objections to evidence associated with Patent Owner's Response (Paper 17) in this proceeding.

- Exhibit 2004 (U.S. Patent Pub. No. 2024/0295960 ("Li")) and Exhibit 2005 (U.S. Patent Pub. No. 2023/0343398 ("Dong")): Petitioner objects on the grounds of relevance and Federal Rules of Evidence 402 and 403. These exhibits postdate the priority date of the '957 patent and thus cannot be used to explain the disclosure of the '957 patent for purpose of prior-art invalidity. Patent Owner's attempt to use the irrelevant evidence unfairly prejudices Petitioner, confuses the issues presented in the Petition, and misleads the Board.
- Exhibit 2006 (Transcript of December 17, 2024 Deposition of Dr. Liu for IPR2024-00795 in Connection with U.S. Patent No. 11,501,822): Petitioner objects on the grounds of relevance and Federal Rules of Evidence 402 and 403. Dr. Liu's testimony regarding an unrelated patent is not relevant to issues related to the '957 patent. Patent Owner's attempt to take Dr. Liu's testimony out of context unfairly prejudices Petitioner, confuses the issues presented in the Petition, and misleads the Board. Petitioner further maintains and preserves all objections as stated on the record of the deposition transcript.

Dated: February 6, 2025

Respectfully submitted,

/Jeremy Jason Lang/

Jeremy Jason Lang

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CERTIFICATE OF SERVICE

The undersigned hereby confirms that the foregoing paper was caused to be served on February 6, 2025 via electronic mail, upon the following attorneys of record for the Patent Owner:

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