

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

PATENT OWNER'S REQUEST FOR ORAL HEARING

Pursuant to 37 C.F.R. § 42.70, Patent Owner Yangtze Memory Technologies Co. Ltd. (“Patent Owner”) submits this Request for Oral Hearing on the instituted grounds of unpatentability for claims 1-6 of U.S. Patent No. 11,468,957 (“’957 patent”) under 35 U.S.C. §§ 102 and 103 and associated issues. Patent Owner also requests rebuttal to respond to all issues raised by Petitioner’s presentation. Given the number of issues involved, Patent Owner requests that each side be allotted sixty (60) minutes total for oral argument.

Patent Owner intends to discuss the issues raised in the parties’ filings under the ongoing review, including but not limited to, the following items:

1. Any issues addressed by Petitioner, including in the Petition for Inter Partes Review and Reply, including the patentability of claims 1-6 of the ’957 patent.
2. Any issues raised by Patent Owner, including in Patent Owner’s Response and Sur-reply.
3. Rebuttal to Petitioner’s presentation on all matters.
4. Any other issues related to invalidity that the Board deems necessary for issuing a final written decision.

Patent Owner requests to have the hearing held in person at the USPTO headquarters in Alexandria, VA. Patent Owner requests the ability to use

audio/visual equipment to display demonstratives and exhibits at the oral hearing, to the extent available at the time of the hearing.

Dated: June 27, 2025

Respectfully submitted,

By: /James L. Davis, Jr./
James L. Davis, Jr. (Lead Counsel)
Reg. No. 57,325
Counsel for Yangtze Memory
Technologies Co. Ltd.

CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing PATENT OWNER'S REQUEST FOR ORAL HEARING 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 the 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 PTABDocketJL2@orrick.com PTABDocketJ3B3@orrick.com T61PTABDocket@orrick.com PTABDocketJ1H1@orrick.com micron-ymtc_ohs@orrick.com	K. Patrick Herman Registration No. 75,018 (pherman@orrick.com) Jared Bobrow <i>Pro Hac Vice</i> (jbobrow@orrick.com) Travis Jensen Registration No. 60,087 (tjensen@orrick.com) Johannes Hsu Registration No. 74,689 (johanneshsu@orrick.com)
<i>Counsel for Petitioner Micron Technology, Inc.</i>	

Dated: June 27, 2025

By: /Jonathan Bradford/
Name: Jonathan Bradford

ROPES & GRAY LLP