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 UNOPPOSED MOTION FOR *PRO HAC VICE* ADMISSION OF ANDREW RADSCH

LIST OF EXHIBITS

Exhibit	Description
Ex. 2001	Micron 4-2 Claim Construction Disclosure
Ex. 2002	YMTC 4-2 Claim Construction Disclosure
Ex. 2003	Declaration of Steven Przybylski ("Przybylski")
Ex. 2004	U.S. 2024/0295960 ("Li")
Ex. 2005	U.S. 2023/0343398 ("Dong")
Ex. 2006	Transcript of December 17, 2024 Deposition of Dr. Liu for IPR2024-00795 in Connection with Patent U.S. 11,501,822 ("Liu822 Tr.")
Ex. 2007	U.S. 10,726,920 ("Yang")
Ex. 2008-09	Reserved
Ex. 2010	Declaration of Jonathan Bradford
Ex. 2011	Transcript of May 28, 2025 Deposition of Dr. Liu for IPR2024-00792 in Connection with Patent U.S. 11,468,957 ("Liu957 Tr.")
Ex.2012	Declaration Of Andrew Radsch In Support Of Motion For *Pro Hac Vice* 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 June 10, 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 11,468,957 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 2012 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**
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Counsel for Petitioner Micron Technology, Inc.	

Dated: July 9, 2025

By: /Jonathan Bradford/
Name: Jonathan Bradford

ROPES & GRAY LLP