

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

Title: ARCHITECTURE AND METHOD FOR NAND MEMORY OPERATION

AUTHORIZED RESPONSE TO DIRECTOR REVIEW REQUEST

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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. Pat. App. Pub. No. 2024/0295960
Ex. 2005	U.S. Pat. App. Pub. No. 2023/0343398
Ex. 2006	Transcript of December 17, 2024 Deposition of Dr. Liu for IPR2024-00795 in Connection with Patent U.S. 11,501,822
Ex. 2007	U.S. Pat. No. 10,726,920
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
Ex. 2012	Declaration of Andrew Radsch
Ex. 2013	Patent Owner’s Hearing Demonstratives

LIST OF ABBREVIATIONS

Abbreviation	Term
'957	U.S. Pat. No. 11,468,957 (Ex. 1001)
Liu	Declaration of David Kuan-Yu Liu (Ex. 1003)
Hongtao	Chinese Pat. App. Pub. No. 109065091 (Ex. 1005)
Seo	U.S. Pat. App. Pub. No. 2021/0027848 (Ex. 1009)
Aritome	Seiichi Aritome, <i>NAND Flash Memory Technologies</i> (2016) (Ex. 1014)
LiuR	Reply Declaration of David Kuan-Yu Liu (Ex. 1027)
Przybylski	Declaration of Steven Przybylski (Ex. 2003)
Petition or Pet.	Petition for <i>Inter Partes</i> Review of U.S. Pat. No. 11,468,957 (IPR2024-00792, Paper 1)
POR	Patent Owner's Response (IPR2024-00792, Paper 17)
Reply	Petitioner's Reply Brief (IPR2024-00792, Paper 20)
PO Sur-reply	Patent Owner's Sur-Reply (IPR2024-00792, Paper 22)
FWD	Judgment – Final Written Decision (IPR2024-00792, Paper 36)
Request	Petitioner's Request for Director Review of the Board's Final Written Decision (IPR2024-00792, Paper 37)
Board	Patent Trial and Appeal Board
Patent Owner or PO	Yangtze Memory Technologies Co. Ltd.
Petitioner	Micron Technology, Inc.

I. Introduction

Petitioner's Request for Director Review of the Board's FWD should be denied. The Board's analysis was detailed and well-grounded in the facts and law. The Request, in contrast, distorts the record, identifies no legal error, and makes new arguments not raised in the trial setting.

For Ground 1, Petitioner's sole complaint is that the Board credited the testimony of PO's expert. Dr. Przybylski testified that Hongtao's Figure 2 depicts *target* voltages applied to *word lines* of a memory device, instead of *actual* bias voltages applied to *gate terminals* of memory cells, which is what the claims require. Labeling Dr. Przybylski's testimony as unsupported and contradictory to Hongtao, Petitioner ignores the record. Dr. Przybylski's analysis was extensive and his reasoning supported by documentary evidence. In contrast, as the Board noted, Petitioner's expert, Dr. Liu, failed to address whether Hongtao's Figure 2 depicts actual bias voltages instead of mere target voltages. Instead, Dr. Liu confined his analysis to whether applying voltage to a word line (as disclosed by Hongtao) is the same as applying voltage to a gate terminal (as claimed in the '957). In any event, Dr. Liu *admitted* that Figure 2 shows "target values"—dooming Petitioner's case. Thus, not only was Dr. Przybylski's testimony unrebutted, it was consistent with Dr. Liu's own testimony. Nowhere does Hongtao state that Figure 2 depicts actual bias voltages, and nowhere did Petitioner

supply any evidence that it does. Even if Petitioner had done so, the Board was justified in weighing the credibility of the parties' experts and finding Dr. Przybylski more credible.

Revealing a lack of conviction in its core argument, Petitioner makes the backup argument that even if Figure 2 does show target values, Dr. Przybylski failed to show that Hongtao's purported actual voltages do not reach their target values. That argument is an improper attempt to place on PO the burden to prove non-obviousness. In addition, the premise of Petitioner's argument is that Hongtao discloses actual voltages, but it doesn't. Further still, the suggestion of Petitioner's argument is that Hongtao's target values should render obvious the claimed applied values. But Petitioner did not assert obviousness for the limitation requiring the second voltage be smaller than the first; it limited the trial ground to whether Figure 2 actually discloses the first and second bias voltage limitation. Petitioner cannot pivot to a new ground now.

For Ground 3, the Request ignores the basis for the Board's finding that Petitioner failed to carry its burden: the lack of any explanation in the Petition or by Petitioner's expert for why Seo's read operation discloses the claimed "pre-verify" limitation. The Petition's entire analysis for the "pre-verify" limitation comprises a single sentence consisting mostly of the claim language, followed by a figure. There is no analysis or explanation. Dr. Liu's testimony was just as

conclusory. The problem for Petitioner is that Seo describes *read* operations, not *verify* operations. And as the Board correctly noted, neither Petitioner nor its expert explained how Seo's read operation discloses the claimed verify operation. Nor did they explain how the two time periods in Seo's read operation (t1 and t2) form a "pre-verify" stage and a "verify" stage. Petitioner's attempt to assign error to the Board is an attempt to distract from Petitioner's failure to explain or support its ground.

II. The challenged '957 patent

The '957 patent discloses and claims an improved technique for performing verify operations in flash memory devices. POR 1; FWD 3. A verify operation, which is different from a read operation, occurs after a programming operation to verify whether a cell was programmed correctly. POR 4. Traditional verification operations suffered from certain drawbacks, such as hot carrier injection, leading to induced edge summation loss. POR 4-5. The claimed invention of the '957 helps to address these issues by subdividing the verification operation into multiple stages that occur after programming (*e.g.*, a "pre-verify stage" where voltages are applied to prepare the device for a subsequent "verify stage"), and selectively applying different voltages to the gate terminals of the selected memory cell and other not-programmed memory cells during each stage. POR 5; FWD 3.

There are challenges with applying desired voltages to a memory device. One of the challenges the '957 addresses is that target voltages applied to word lines may differ from the resulting voltages that develop on gate terminals. POR 3; FWD 16. Thus, the '957 distinguishes between the target voltages that may be applied through word line layers during a pre-pulse stage, and the bias voltages applied on the gate terminals of the memory cells that develop over time as a result. *See, e.g.*, '957, 11:58-12:9, 12:10-27. Figure 5 of the '957 illustrates how a short pre-pulse period may prevent the applied “bias voltages” experienced by the gates from developing fully, resulting in them being “less than a target value, such as 6.8 volts” during the pre-pulse period. '957, 12:18-19; Przybylski, ¶ 90. The '957's recognized distinction between target values and realized bias voltages was key to the Board's decision. FWD 16.

III. Petitioner provides no basis to disturb the Board's rejection of Ground 1

The Board correctly determined that Petitioner failed to carry its burden of showing the claims to be obvious over Ground 1.

A. The Board's determination that Petitioner failed to carry its burden on Ground 1 was amply supported

In seven pages of detailed analysis (FWD 11-17), the Board considered the arguments and evidence, weighed the credibility of the parties' experts, identified

where expert testimony went un rebutted, and concluded that Petitioner failed to carry its burden of proof. That determination was amply supported by the record.

The limitation at issue requires applying a first bias voltage on a gate terminal of a memory cell during a pre-verify stage, then applying a second bias voltage on a gate terminal of a memory cell during a verify stage, where the second bias voltage is less than the first bias voltage. FWD 11. For that limitation, Petitioner relied exclusively on Hongtao's Figure 2. Pet. 39; FWD 11-12.

The Board noted that the parties' declarants provided different interpretations of Hongtao Figure 2. Dr. Przybylski explained that Figure 2's waveforms depict target voltages, rather than resulting voltages that develop at gate terminals. FWD 13-15. As to that core issue, whether Figure 2 depicts target or resulting voltages, the Board correctly noted that Dr. Liu failed even to address Dr. Przybylski's persuasive testimony. FWD 16-17.

The Board thus credited Dr. Przybylski's testimony and found credible his explanation that "Hongtao lacks the details needed to determine how the gate voltages develop over time, in particular the length of the pre-conduction period." FWD 16. That testimony was, the Board commented, consistent with the '957 itself, which teaches that bias voltages may not fully develop to a target value, if not given sufficient time. *Id.* The Board thus concluded: "In light of Hongtao's dearth of details regarding the absolute or relative magnitudes of the pre-

conduction and conduction voltages, and Dr. Przybylski's unrebutted testimony that Hongtao does not provide sufficient information to ascertain the actual bias voltages that will be applied on the gate terminals of the memory cells over time, we are not persuaded that Petitioner carries its burden of establishing that Hongtao discloses limitation [1.d]." FWD 17.

B. Each of Petitioner's arguments about Board error fails

Petitioner identifies no error of law or fact in the FWD, but instead distorts the record, makes new arguments, and attempts to shift the burden of proof to PO. Each of Petitioner's arguments fails.

First, Petitioner ignores the record when it argues that Dr. Przybylski failed to support his opinion that Figure 2 shows target voltages applied to word lines, not actual bias voltages at the gate terminals (Request 6-8). Over nearly seven pages of his declaration, Dr. Przybylski explained in detail why Hongtao's Figure 2 depicts target voltages for word lines, not the resulting voltages applied at a gate terminal. Przybylski, ¶¶ 93-101; *see also* FWD 14-15 (quoting at length and crediting Dr. Przybylski's reasoned explanation). In addition to his detailed explanation, Dr. Przybylski cited for support (i) an IEEE textbook, *NAND Flash Memory Technologies*, that Petitioner itself cited in the Petition (*see* Przybylski, ¶ 94 (citing Aritome)); (ii) Dr. Liu's testimony from another proceeding in which he acknowledged that there will always be ramping time before applied voltage

reaches its target value (*see id.*, ¶ 95); and (iii) the '957's discussion of bias voltages requiring enough time to progress fully to reach a target value (*see id.*, ¶¶ 97-98). That is ample "documentary support" for Dr. Przybylski's opinion. *Cf.* Request 7-8.

Dr. Przybylski's testimony was not only well-supported, it was consistent with the opinion of Petitioner's own expert, Dr. Liu. Dr. Liu affirmatively testified that Hongtao's Figure 2 depicts "intended target levels." LiuR, ¶ 19. Thus, Petitioner's own expert refutes its assertion that Dr. Przybylski's testimony contradicts Hongtao. Petitioner's citation of *Advanced Technology Materials* (Request 7) is inapposite because Dr. Przybylski's testimony was neither conclusory nor contrary to Hongtao's disclosure.

It is important to note, too, that while Petitioner faults the Board for "declin[ing] to find the claim limitation obvious," Request 4, Petitioner did not allege obviousness for this limitation. The Petition asserted only that Hongtao's Figure 2 "discloses" the first applied voltage being greater than the second applied voltage. Pet. 39 ("Hongtao discloses this limitation"); *cf.* Pet. 29 (alleging that "Hongtao discloses, or at least renders obvious" a different limitation). Petitioner cannot now assert a ground not raised in its Petition. *See Corephotonics, Ltd. v. Apple Inc.*, 84 F.4th 990, 1002, 1008-09 (Fed. Cir. 2023). To be certain, an "intended target" voltage is not, of course, an "appl[ied]" voltage, particularly

where (i) Hongtao's target voltages are applied to word lines, yet the claims require bias voltages "appl[ied]" at "gate terminal[s]," and (ii) Hongtao is silent whether, or over what time period, applied voltages reach the intended targets in Figure 2. That silence is deafening where the claims require that the applied voltage be greater in a pre-verify stage than in a verify stage, meaning the time at which a target is reached is critical to the analysis.

Second, Petitioner argues that even if Hongtao's Figure 2 depicts target values, the Board still erred because Dr. Przybylski did not support his opinion that Hongtao's applied voltages fail to reach their target value. Petitioner's backup argument fails on several levels. For starters, that argument attempts to shift the burden to PO to show non-obviousness. But Petitioner always retains the burden to prove obviousness. *E.g., Fanduel, Inc. v. Interactive Games LLC*, 966 F.3d 1334, 1341 (Fed. Cir. 2020) (holding that the burden never shifts to patent owner in an IPR) (citations omitted).

In any event, Dr. Przybylski rooted his analysis in Hongtao's disclosures. He provided a figure depicting what he concluded the applied voltages would be if one extrapolated from the target values of Hongtao's Figure 2. POR 40. While Petitioner criticizes his conclusion, its expert provided no alternative waveform or volage levels. Instead, Petitioner argued that the actual voltage might "overshoot," "undershoot," or "reach" the target. Reply 23; PO Sur-reply 14-15. And yet,

Petitioner never established which occurs in Hongtao, confirming that the Board correctly found that Petitioner failed to carry its burden. Petitioner's further argument that Hongtao is presumed enabling is of no moment. Hongtao is silent about, and not dependent on, whether the *actual* voltage at the gate is higher in the pre-conduction phase than the voltage in the reading stage.

Petitioner's backup argument also fails because it goes beyond what Figure 2 discloses. Figure 2, the only disclosure the Petition relied on for the limitation at issue, does not depict or disclose actual voltages. It depicts only target values, as discussed above. It makes no sense for Petitioner to argue that Dr. Przybylski did not show that Hongtao's actual voltages do not reach their target value when Hongtao does not depict or disclose actual voltages. The annotated figure Dr. Przybylski created (referenced above) was an extrapolation from what Figure 2 actually discloses—target values—to show how actual voltages (not disclosed) would develop. By criticizing that extrapolation and arguing a different conclusion could have been reached, Petitioner is trying to backdoor an obviousness argument for this limitation. As discussed above, however, the Petition did not assert that Hongtao rendered the limitation obvious. It relied only on actual disclosure of the limitation. Not surprisingly, then, Petitioner made no effort to show obviousness of this limitation, nor could it where it argued that the actual value may overshoot, undershoot, or reach the target, without knowing which in Hongtao occurs.

The Director should not disturb the Board's conclusion as to Ground 1.

IV. The Board properly rejected Ground 3 because Petitioner did not, and could not, show that Seo discloses distinct pre-verify and verify stages

Petitioner also criticizes the Board's analysis of Ground 3, but it ignores why the Board determined that Petitioner failed to carry its burden of showing obviousness. The Board's determination was based squarely on the fact that, for one of the disputed limitations, Petitioner provided only conclusory argument, and it utterly failed to explain or support its position. There is again no basis to disturb the Board's decision.

Claim 1 of the '957 requires distinct pre-verify and verify stages, and specifically recites applying, in a pre-verify stage, a first verify voltage. '957, claim 1. For that pre-verify limitation, Petitioner relied exclusively on Seo, contending that Seo discloses that limitation. Pet. 106-07. Seo does not disclose a verify operation, let alone a pre-verify stage with a first verify voltage. As Petitioner's Request concedes (at 12-13), Seo discloses a *read* operation that spans first and second time periods (t1 and t2).

The Board rightly concluded that Petitioner did not meet its burden of proving obviousness. Specifically, the Board concluded as follows:

Although Seo's read operation includes two time periods during which different voltages are applied, we are not directed to, nor do we discern, any teachings in Seo that time period t1 is a pre-verify stage

that is distinct from the verify/read stage. In that regard, Dr. Liu testifies that “Seo discloses *apply[ing], in a pre-verify stage* (a first time period t1 preceding a read/verify period t2)” without further explanation. Ex. 1003 ¶ 249 (alteration in original). As a result, we are not persuaded that Petitioner sufficiently establishes that Seo’s time period t1 is a pre-verify stage that is distinct from a verify/read stage.

FWD 29. The Board did not err in reaching that conclusion.

Petitioner was required to “present a clear argument” in its Petition. *Netflix, Inc. v. DivX, LLC*, 84 F.4th 1371, 1377 (Fed. Cir. 2023); *see also Intelligent Bio-Sys., Inc. v. Illumina Cambridge Ltd.*, 821 F.3d 1359, 1369 (Fed. Cir. 2016) (“It is of the utmost importance that petitioners in the IPR proceedings adhere to the requirement that the initial petition identify ‘with particularity’ the ‘evidence that supports the grounds for the challenge to each claim.’” (quoting 35 U.S.C. § 312(a)(3) (2012))). Thus, “to satisfy its burden of proving obviousness, a petitioner cannot employ mere conclusory statements,” but “must instead articulate specific reasoning, based on evidence of record,” to support obviousness. *In re Magnum Oil Tools Int’l, Ltd.*, 829 F.3d 1364, 1380 (Fed. Cir. 2016).

Petitioner did not do so. It asserted that Seo discloses a pre-verify stage in just one sentence, half of which quoted the claim language, and one unexplained figure. Pet. 106-07. And it cited just one paragraph of Seo, showing merely that

Seo's read operation has two time periods. *Id.* at 107 (citing Seo [0090]).¹ Dr.

Liu's declaration was nearly verbatim the same. Liu, ¶ 249. Absent from the Petition (or Dr. Liu's declaration) was *any* explanation why Seo's read operation spanning two time periods disclosed the claimed pre-verify stage or operation. The Board correctly concluded that Petitioner's conclusory statement fell short.

The Board's refusal to blindly accept Petitioner's single-sentence assertion was not only legally supported, it was factually supported, too. **First**, Seo discloses a read operation but no verify operation. Verify operations and read operations are different. POR 30-32 (citing many supporting references); Przybylski, ¶¶ 81-82. Indeed, in referring to these operations as "virtually identical," Request 15, Petitioner concedes that they are not the same operation. That admission is fatal to Petitioner's argument that Seo actually "discloses" the pre-verify limitation. Petitioner's Request, like its Petition, does not assert that Seo renders this limitation obvious. *See* Request 11-15.

Second, even if Seo had a verify operation, that does not mean that its two time periods (t1 and t2) are distinct stages, or that the first time period is a "pre-

¹ The Reply is no better. It cites nothing from Seo showing that Seo's time periods represent distinct stages or that Seo's read operation is a verify operation. Instead, it relies on conclusory, impenetrable expert testimony. *See* Reply 28-29.

verify” stage. For example, a single stage can have multiple periods each with their own voltages. As Petitioner argued, “the ’957 patent . . . do[es] not require applying the [same] voltages throughout the given stage.” Pet. 18. And the ’957 itself discloses that “the [pre-verify] stage can include a first portion T1 and a second portion T2.” ’957, 13:11-12. Between those portions, some voltages change. *Id.* at 2:41-63. Petitioner provided no explanation for why Seo’s two time periods are not two time periods of a single stage but are instead separate and distinct stages.

For these reasons, Petitioner’s argument that the Board reached a conclusion that was inconsistent with its factual findings, lacks merit. Request 12. There is no inconsistency between the Board finding that Seo discloses a read operation with two time periods, and its conclusion that Petitioner’s single-sentence assertion did not adequately explain why Seo discloses a pre-verify operation.

Similarly, the Board did not fail to provide a “reasoned explanation.” Request 13. The Board explained that its determination was based on the conclusory and unexplained nature of Petitioner’s assertion. And the Board properly rejected Dr. Liu’s testimony. It can—indeed, must—disregard conclusory expert testimony. *TQ Delta, LLC v. CISCO Sys., Inc.*, 942 F.3d 1352, 1358 (Fed. Cir. 2019). Dr. Liu asserted that Seo’s “first time period” was a pre-verify stage “without further explanation.” FWD 29. That is a mere conclusion. Petitioner

counters that “the Board did not articulate what ‘further explanation’ was necessary to demonstrate that Seo satisfies the claim limitation.” Request 13.

When the Board rejects an argument, however, it need not say what other arguments might have succeeded. After all, the Board need not “explain every possible reason supporting its conclusion.” *Yeda R&D Co. v. Mylan Pharms. Inc.*, 906 F.3d 1031, 1046 (Fed. Cir. 2018) (quoting *Synopsis, Inc. v. Mentor Graphics Corp.*, 814 F.3d 1309, 1322 (Fed. Cir. 2016)).

Nor did the Board have to discuss paragraph 89 of Dr. Liu’s report, which is part of the background discussion. *See* Request 14 (citing Liu, ¶ 89). The Board need not “explicitly discuss . . . every piece of evidence[.]” *Novartis AG v. Torrent Pharms. Ltd.*, 853 F.3d 1316, 1328 (Fed. Cir. 2017). This is especially true when the Board’s treatment “was at least commensurate with” the Petitioner’s. *Id.* at 1327. The Petition cited paragraph 89 only once, while citing three other paragraphs, and without explaining its relevance. Pet. 27. Indeed, paragraph 89 is irrelevant: it explains why Seo’s t1 helps reduce hot carrier injection, not why t1 is a pre-verify stage. Petitioner “rel[ied] on a vague, generic, and/or meandering petition”; it cannot now “fault the Board for failing to understand what the petition really meant.” *Netflix*, 84 F.4th at 1377.

Finally, and contrary to Petitioner’s final argument, the Board’s reasoning was “base[d] . . . on arguments that were advanced by a party, and to which the

opposing party was given a chance to respond.” *Magnum*, 829 F.3d at 1381.

Petitioner claims that PO argued only that Seo lacked a verify operation. Request 15. But PO argued that Seo lacked a pre-verify stage, too. The POR stated that “[e]ven assuming that a POSITA would have been motivated to employ Seo’s teachings when performing a verification operation, it does not follow that the time period t1 in Seo would thus be converted to a ‘pre-verify stage’ in the sense of the ’957.” POR 60-61. Clearly, that issue was disputed.

V. Conclusion

Petitioner provides no basis to disturb the Board’s well-supported findings. The Request for Director Review should be denied.

Dated: December 12, 2025

Respectfully submitted,

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CERTIFICATE OF SERVICE

I, Jacob Todd, hereby certify that on this 12th day of December 2025, a copy of the foregoing **AUTHORIZED RESPONSE TO DIRECTOR REVIEW REQUEST** was served via the Patent Trial and Appeal Case Tracking System (P-TACTS), with an additional courtesy copy via e-mail, on the following:

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