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.: IPR2024-00793
U.S. Patent No. 11,600,342

PETITIONER'S MOTION FOR ADMISSION *PRO HAC VICE* OF JARED BOBROW PURSUANT TO 37 C.F.R. § 42.10

LISTING OF EXHIBITS

Exhibit	Description
1001	U.S. Patent No. 11,600,342 to Chen et al.
1002	File History of U.S. Patent No. 11,600,342 to Chen et al.
1003	Declaration of David Kuan-Yu Liu, Ph.D. ("Liu")
1004	*Curriculum Vitae* of David Kuan-Yu Liu, Ph.D.
1005	U.S. Patent Publ. No. 2021/0027848 A1 to Seo ("Seo")
1006	U.S. Patent Publ. No. 2015/0003169 A1 to Nam et al. ("Nam")
1007	Choi et al., "Comprehensive evaluation of early retention (fast charge loss within a few seconds) characteristics in tube-type 3-D NAND Flash Memory," 2016 Symposium on VLSI Technology, Digest of Technical Papers, 78-79 ("Choi")
1008	U.S. Patent Publ. No. 2012/0151301 A1 to Izumi et al. ("Izumi")
1009	Minute Order, Dkt. No. 42, dated February 22, 2024 in *Yangtze Memory Technologies Company, Ltd. v. Micron Technology, Inc. and Micron Consumer Products Group, LLC*, Case No. 3:23-cv-05792-RFL
1010	Combined Civil and Criminal Federal Court Management Statistics (December 31, 2023), available at https://www.uscourts.gov/sites/default/files/data_tables/fcms_na_distcomparison1231.2023.pdf
1011	Docket from *Yangtze Memory Technologies Company, Ltd. v. Micron Technology, Inc. and Micron Consumer Products Group, LLC*, Case No. 3:23-cv-05792-RFL
1012	U.S. Patent No. 9,589,978 to Yip
1013	Aritome, "NAND Flash Memory Technologies" (2016)
1014	Silvagni, "3D NAND Flash Based on Planar Cells," Computers 2017

Exhibit	Description
1015	U.S. Patent Publ. No. 2020/0168276 A1 to Yang
1016	U.S. Patent No. 9,620,233 to Dong et al.
1017	Micheloni, "3D Flash Memories" (2016)
1018	U.S Patent No. 10,276,251 B1 to Lobana et al.
1019	U.S Patent No. 9,361,993 B1 to Chen et al.
1020	Affidavit of Nathaniel E. Frank-White (Internet Archive) re Choi Reference (Ex. 1007)
1021	Declaration of Gordon MacPherson (IEEE) re Choi Reference (Ex. 1007)
1022	Certified File History of U.S. Patent No. 10,403,637 to Lue
1023	Wu et al., "Multiscale simulation of lateral charge loss in Si3N4 3D NAND flash based on density functional theory," Journal of Physics D: Applied Physics, vol. 52, no. 39, 395103, 2019
1024	U.S. Patent Publ. No. 2019/0198117 A1 to Yu et al.
1025	U.S. Patent No. 10,121,529 B2 to Lee
1026	Micheloni et al., "Inside Solid State Drives (SSDs)" (2nd Ed. 2018)
1027	U.S. Patent Publ. No. 2020/0395372 A1 to Seo et al.
1028	U.S. Patent Publ. No. 2019/0348122 A1 to Ko et al.
1029	U.S. Patent Publ. No. 2016/0293271 A1 to Won et al.
1030	*Intentionally Omitted*
1031	*Intentionally Omitted*
1032	*Intentionally Omitted*
1033	*Intentionally Omitted*

Exhibit	Description
1034	*Intentionally Omitted*
1035	Complaint for Patent Infringement, Dkt. No. 1, filed Nov. 9, 2023, in *Yangtze Memory Technologies Company, Ltd. v. Micron Technology, Inc. and Micron Consumer Products Group, LLC*, Case No. 3:23-cv-05792-RFL
1036	First Amended Complaint for Patent Infringement, Dkt. No. 29, filed Feb. 2, 2024, in *Yangtze Memory Technologies Company, Ltd. v. Micron Technology, Inc. and Micron Consumer Products Group, LLC*, Case No. 3:23-cv-05792-RFL
1037	Plaintiff and Counterclaim Defendant Yangtze Memory Technologies Company, Ltd.'s Disclosure of Asserted Claims and Infringement Contentions, dated May 6, 2024, in *Yangtze Memory Technologies Company, Ltd. v. Micron Technology, Inc. and Micron Consumer Products Group, LLC*, Case No. 3:23-cv-05792-RFL
1038	Declaration of Jared Bobrow in Support of Petitioner's Motion for Admission *Pro Hac Vice*

Pursuant to 37 C.F.R. § 42.10, Petitioner Micron Technology, Inc. ("Micron" or "Petitioner") respectfully requests that the Board admit Jared Bobrow *pro hac vice* in this proceeding.

I. STATEMENT OF FACTS

Pursuant to 37 C.F.R. § 42.10(c), the Board

> *may recognize counsel pro hac vice during a proceeding upon a showing of good cause, subject to the condition that lead counsel be a registered practitioner and to any other conditions as the Board may impose. For example, where the lead counsel is a registered practitioner, a motion to appear pro hac vice by counsel who is not a registered practitioner may be granted upon showing that counsel is an experienced litigating attorney and has an established familiarity with the subject matter at issue in the proceeding.*

The facts, supported by the accompanying Declaration of Jared Bobrow in Support of Petitioner's Motion for Admission *Pro Hac Vice* (Ex. 1038, "Bobrow Declaration"), establish good cause to admit Mr. Bobrow *pro hac vice* in this proceeding

Lead counsel Jeremy Jason Lang is a registered practitioner.

Jared Bobrow is an experienced litigation attorney. Mr. Bobrow has been a litigating attorney for more than 35 years. Bobrow Declaration ¶ 1. Mr. Bobrow has been litigating patent cases for over 33 of those years. *Id.* Mr. Bobrow is a member in good standing of the California State Bar, with no suspensions or disbarments from practice, nor any application for admission to practice denied, nor any sanctions or contempt citations, and is admitted to practice in the United States Court of Appeals for the Federal Circuit, United States Court of Appeals for the Ninth Circuit, United States Court of Appeals for the First Circuit; California State Supreme Court; the United States District Court for the Eastern District of Texas; and the United States District Courts for the Central, Eastern, Northern, and Southern Districts of California. *Id.* ¶¶ 1-4.

Mr. Bobrow has familiarity with the subject matter at issue in this proceeding and in the related district court case: *Yangtze Memory Technologies Co., Ltd. v. Micron Technology, Inc. & Micron Consumer Products Group, LLC*, Case No. 3:23-cv-05792-RFL (N.D. Cal., filed Nov. 9, 2023) in which U.S. Patent No. 11,600,342 was asserted by the Patent Owner. Bobrow Declaration ¶ 9.

Mr. Bobrow has read and will comply with the Office Patent Trial Practice Guide and the Board's Rules for Practice for Trials set forth in part 42 of the C.F.R, and he agrees to be subject to the USPTO Code of Professional Responsibility set

forth in 37 C.F.R. §§ 10.20 *et seq*., and to disciplinary jurisdiction under 37 C.F.R. § 11.19(a). Bobrow Declaration ¶¶ 5-6.

II. ANALYSIS

The facts contained in the Statement of Facts above, and contained in the Bobrow Declaration, establish that there is good cause to admit Mr. Bobrow *pro hac vice* in this proceeding under 37 C.F.R. § 42.10. Lead counsel is a registered practitioner, Mr. Bobrow is an experienced patent litigation attorney, and Mr. Bobrow has familiarity with the subject matter at issue in this proceeding.

III. CONCLUSION

For the foregoing reasons, Petitioner respectfully requests that the Board admit Jared Bobrow *pro hac vice* in this proceeding.

Respectfully submitted,

ORRICK, HERRINGTON & SUTCLIFFE LLP

Dated: June 11, 2024

/Jeremy Jason Lang/

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CERTIFICATE OF SERVICE

The undersigned hereby confirms that the foregoing paper was caused to be served on June 11, 2024 via electronic mail, upon the following attorneys of record for the Patent Owner:

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