

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 IPR2024-00795
Patent 11,501,822

**DECLARATION OF JONATHAN BRADFORD
IN SUPPORT OF PATENT OWNER'S RESPONSE**

1. I, Jonathan Bradford, make the following Declaration pursuant to 28 U.S.C. § 1746: I am a Senior IP Paralegal at the law firm of Ropes & Gray LLP.

2. I provide this Declaration in connection with the above-identified *Inter Partes* Review proceeding that is before the United States Patent and Trademark Office (“USPTO”). Unless otherwise stated, the facts stated in this Declaration are based on my personal knowledge.

3. Ex. 2012 is a true and correct copy of *Pulse*, Wiley Electrical and Electronics Engineering Dictionary (2004) produced by Micron in *Yangtze Memory Technologies Company, Ltd. v. Micron Technology, Inc.*, N.D. Cal. 3:23-cv-05792-RFL as document MYM0069175, which was obtained at my direction. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

4. Ex. 2013 is a true and correct copy of *Pulse*, IEEE Standard Dictionary (1996) produced by Micron in *Yangtze Memory Technologies Company, Ltd. v. Micron Technology, Inc.*, N.D. Cal. 3:23-cv-05792-RFL as document MYM0069160, which was obtained at my direction. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

5. Ex. 2014 is a true and correct copy of *Pulse*, Webster's II New College Dictionary (2001) produced by Micron in *Yangtze Memory Technologies Company, Ltd. v. Micron Technology, Inc.*, N.D. Cal. 3:23-cv-05792-RFL as document MYM0068603, which was obtained at my direction. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

6. Ex. 2015 is a true and correct copy of Micron's Preliminary Claim Constructions and Extrinsic Evidence Pursuant to Patent Local Rule 4-2, *Yangtze Memory Technologies Company, Ltd. v. Micron Technology, Inc.*, N.D. Cal. 3:23-cv-05792-RFL (Aug. 5, 2024) ("Micron's Preliminary Claim Constructions"), which was obtained at my direction. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

7. Ex. 2016 is a true and correct copy of *Dispose*, Merriam-Webster's Dictionary and Thesaurus (2014), which was obtained at my direction. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

8. Ex. 2017 is a true and correct copy of *Dispose*, Merriam-Webster's Collegiate Dictionary (2012), which was obtained at my direction. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

9. Ex. 2018 is a true and correct copy of *Dispose*, American Heritage Dictionary of the English Language (2011), which was obtained at my direction. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

10. Ex. 2019 is a true and correct copy of *Dispose*, New Oxford American Dictionary (2010), which was obtained at my direction. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

11. Ex. 2020 is a true and correct copy of Series of Images, Stamped as Ex. 2020 in the December 17, 2024, Deposition of Dr. David Kuan-Yu Liu, which was obtained at my direction. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

12. Ex. 2021 is a true and correct copy of Transcript of the December 17, 2024, Deposition of Dr. David Kuan-Yu Liu, which was obtained at my direction. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

13. Ex. 2022 is an excerpt of a true and correct copy of HAMBLEY, ELECTRICAL ENGINEERING PRINCIPLES AND APPLICATIONS, Fourth Edition (2008), which was obtained at my direction. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

14. Certain pages have been resized to 8.5 x 11 inches. No content was removed by this resizing.

15. I hereby declare that all statements made herein of my own knowledge are true and that all statements made on information and belief are believed to be true; and further that these statements were made with the knowledge that willful false statements and the like so made are punishable by fine or imprisonment, or both, under 18 U.S.C. § 1001. If called to testify as to the truth of the matters stated herein, I could and would testify competently.

16. I declare under penalty of perjury that the foregoing is true and correct.

Executed this 3rd day of January, 2025, in Boston, Massachusetts.

/Jonathan Bradford/
Jonathan Bradford
ROPES & GRAY LLP