

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

**PATENT OWNER'S UNOPPOSED MOTION FOR *PRO HAC VICE*
ADMISSION OF ANDREW RADSCH**

LIST OF EXHIBITS

Exhibit ("Ex.")	Description
2001	July 17, 2024, Declaration of Dr. Steven Przybylski ("PrzybylskiI")
2002	U.S. Pat. No. 11,081,164 ("the '164 patent")
2003	Reserved
2004	U.S. Pat. No. 10,700,157 ("Chen")
2005	U.S. Pub. 2011/0194351 ("Kim")
2006-09	Reserved
2010	July 17, 2024, Declaration of Jonathan Bradford
2011	January 3, 2025, Declaration of Dr. Steven Przybylski ("PrzyblyskiII")
2012	Pulse, Wiley Electrical and Electronics Engineering Dictionary (2004)
2013	Pulse, IEEE Standard Dictionary (1996)
2014	Pulse, Webster's II New College Dictionary (2001)
2015	Micron's Preliminary Claim Constructions and Extrinsic Evidence Pursuant to Patent Local Rule 4-2, <i>Yangtze Memory Technologies Company, Ltd. v. Micron Technology, Inc.</i> , N.D. Cal. 3:23-cv-05792-RFL (Aug. 5, 2024) ("Micron's Preliminary Claim Constructions")
2016	Dispose, Merriam-Webster's Dictionary and Thesaurus (2014)
2017	Dispose, Merriam-Webster's Collegiate Dictionary (2012)
2018	Dispose, American Heritage Dictionary of the English Language (2011)
2019	Dispose, New Oxford American Dictionary (2010)
2020	Series of Images, Stamped as Ex. 2020 in the December 17, 2024, Deposition of Dr. David Kuan-Yu Liu

2021	Transcript of the December 17, 2024, Deposition of Dr. David Kuan-Yu Liu (“Liu Tr.”)
2022	Hambley, “Electrical Engineering Principles and Applications, Fourth Edition” (2008) (“Hambley”)
2023-2029	Reserved
2030	January 3, 2025, Declaration of Jonathan Bradford
2031	Patent Owner’s Demonstrative Slides
2032	Declaration Of Andrew Radsch In Support Of Motion For <i>Pro Hac Vice</i> 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 April 17, 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 11,501,822 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 2032 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
K. Patrick Herman Registration No. 75,018 (pberman@orrick.com) Postal & Hand-Delivery Address: Orrick, Herrington & Sutcliffe LLP 1000 Marsh Road Menlo Park, CA 94025 T: 650-614-7400; F: 650-614-7401 P52PTABDocket@orrick.com PTABDocketJJL2@orrick.com PTABDocketJ3B3@orrick.com micron-ymtc_ohs@orrick.com	Jeremy Jason Lang Registration No. 73,604 (jlang@orrick.com) Jared Bobrow <i>Pro Hac Vice</i> (jbobrow@orrick.com)
<i>Counsel for Petitioner Micron Technology, Inc.</i>	

Dated: July 9, 2025

By: /Jonathan Bradford/
Name: Jonathan Bradford

ROPES & GRAY LLP