

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. IPR2024-00909
U.S. Patent No. 10,658,378

JOINT REQUEST FOR ORAL ARGUMENT

Pursuant to 37 C.F.R. § 42.70 and the Board’s Scheduling Order dated January 7, 2025 (Paper No. 13), Petitioner Micron Technology, Inc. (“Petitioner”) and Patent Owner Yangtze Memory Technologies Company, Ltd., (“Patent Owner”) (collectively, “Parties”) request Oral Argument in IPR2024-00909 on issues related to the patentability of claims 1-7 and 18 of U.S. Patent No. 10,658,378.

The Parties request to present arguments on the following issues:

- All grounds on which trial was instituted, including all issues raised by the parties’ papers;
- Rebuttal to any issue raised by either party in its presentation at the oral argument; and
- Any additional issue on which the Board seeks clarification.

The Parties request that the Board hold argument on this IPR (IPR2024-00909) and three related IPRs (IPR2024-00788, IPR2024-00791, and IPR2024-00911) on the same day. The Parties request that the two IPRs challenging U.S. Pat. No. 10,658,378 (IPR2024-00788 and IPR2024-00909) be argued together in a consolidated hearing (“the ’378 hearing”). The Parties similarly request that the two IPRs on U.S. Pat. No. 10,937,806 (IPR2024-00791 and IPR2024-00911) be argued together in a separate, consolidated hearing on the same day (“the ’806 hearing”). Given the similarities between the two challenged patents (which are in the same family), and the number of overlapping grounds and issues between the four

proceedings, the Parties agree that consolidated hearings held on the same day would be the most efficient way to proceed.

The table below shows the current hearing dates set by the respective scheduling orders for the four proceedings, and the Parties' proposed hearing date:

Case No.	U.S. Patent No.	Current Hearing Date	Proposed Hearing Date
IPR2024-00788	10,658,378	August 7, 2025	August 28, 2025
IPR2024-00791	10,937,806	August 28, 2025	August 28, 2025
IPR2024-00909	10,658,378	October 7, 2025	August 28, 2025
IPR2024-00911	10,937,806	October 7, 2025	August 28, 2025

The Parties request that argument for the four IPRs be held on August 28, 2025, which is the date that the Board set for argument in one of the proceedings at issue. IPR2024-00791, Paper 12, at 12. The Parties do not plan to file motions to exclude and, therefore, all four proceedings will be ripe for argument on August 28. The Parties request that the hearings take place in-person at the USPTO headquarters in Alexandria. The Parties request the ability to use audio-visual equipment to display demonstratives and exhibits.

The Parties request that the Board order cross-use of the arguments in each hearing (that is, each hearing is made of record in all four proceedings). Given the number of issues involved, the Parties request that Board allocate each side 60 minutes for argument in the '378 hearing, inclusive of any rebuttal. Given the

number of issues involved, the Parties further request that the Board allocate each side 60 minutes for argument in the '806 hearing, inclusive of any rebuttal.

Respectfully submitted,

ORRICK, HERRINGTON & SUTCLIFFE LLP

Dated: June 27, 2025

/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 27, 2025 via electronic mail, upon the following attorneys of record for the Patent Owner:

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