

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.: IPR2024-00911
U.S. Patent No. 10,937,806

**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. 10,937,806 B2 to Tao et al.
1002	File History of U.S. Patent No. 10,937,806 B2 to Tao et al.
1003	Declaration of Jack C. Lee
1004	<i>Curriculum Vitae</i> of Dr. Jack C. Lee
1005	U.S. Patent Publ. No. 2017/0179026 A1 to Toyama et al. (“Toyama”).
1006	Minute Order, Dkt. No. 42, dated February 22, 2024 in <i>Yangtze Memory Technologies Company, Ltd. v. Micron Technology, Inc. and Micron Consumer Products Group, LLC</i> , Case No. 3:23-cv-05792-RFL
1007	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
1008	Docket from <i>Yangtze Memory Technologies Company, Ltd. v. Micron Technology, Inc. and Micron Consumer Products Group, LLC</i> , Case No. 3:23-cv-05792-RFL
1009	CN109075169A Office Action, dated November 14, 2019
1010	Certified Translation of CN109075169A Office Action, dated November 14, 2019
1011	CN109075169A Reexamination Decision, dated November 25, 2021
1012	Certified Translation of CN109075169A Reexamination Decision, dated November 25, 2021
1013	Micheloni, “3D Flash Memories” (2016)
1014	Aritome, “NAND Flash Memory Technologies” (2016)

Exhibit	Description
1015	U.S. Patent Publ. No. 2018/0108671 A1 to Yu et al.
1016	U.S. Patent Publ. No. 2019/0229125 A1 to Zhou et al.
1017	U.S. Patent No. 10,354,980 B1 to Mushiga et al.
1018	U.S. Patent No. 9,293,348 B2 to Lai et al.
1019	U.S. Patent No. 8,598,643 B2 to Kawasaki et al.
1020	U.S. Patent No. 8,697,519 B2 to Jee et al.
1021	Excerpts from “Merriam-Webster’s Collegiate Dictionary,” Eleventh Edition (2014)
1022	Print out of https://www.studycountry.com/wiki/what-is-a-piece-of-land-surrounded-by-water-on-2-sides
1023	Micheloni et al., “Inside Solid State Drives (SSDs)” (1 st Ed. 2013)
1024	U.S. Patent No. 10,043,558 to Shah et al.
1025	Micheloni et al., “Inside NAND Flash Memories” (2010)
1026	Lau, “Ball Grid Array Technology” (1995)
1027	U.S. Patent No. 10,103,169 to Ge et al.
1028	U.S. Patent No. 9,935,050 to Dunga et al.
1029	Chang, “ULSI Technology” (1996)
1030	Chen, “CMS Devices & Technology for VLSI” (1988)
1031	Jaeger, “Volume V: Introduction to Microelectronic Fabrication” (1988)
1032	U.S. Patent No. 5,776,808 to Muller et al.
1033	U.S. Patent No. 9,236,393 to Cernea

Exhibit	Description
1034	Capogreco et al., “Integration and electrical evaluation of epitaxially grown Si and SiGe channels for vertical NAND Memory applications,” 2015 IEEE International Memory Workshop, 2015
1035	Kim et al., “Three-Dimensional NAND Flash Architecture Design Based on Single-Crystalline Stacked Array,” IEEE Transactions on Electron Devices, Vol. 59, No. 1, Jan. 2012, pp. 35-45
1036	Wagner, “The Use of HBr in Polysilicon Etching,” Gases & Instrumentation International, Vol. 7, Issue 4, July/August (2013) printed from https://www.pall.com/content/dam/pall/microelectronics/literature-library/non-gated/HBr_Polysilicon.pdf
1037	Baker, “CMOS Circuit Design, Layout, and Simulation,” Third Ed. (2010)
1038	Complaint for Patent Infringement, Dkt. No. 1, filed Nov. 9, 2023, in <i>Yangtze Memory Technologies Company, Ltd. v. Micron Technology, Inc. and Micron Consumer Products Group, LLC</i> , Case No. 3:23-cv-05792-RFL
1039	First Amended Complaint for Patent Infringement, Dkt. No. 29, filed Feb. 2, 2024, in <i>Yangtze Memory Technologies Company, Ltd. v. Micron Technology, Inc. and Micron Consumer Products Group, LLC</i> , Case No. 3:23-cv-05792-RFL
1040	Plaintiff and Counterclaim Defendant Yangtze Memory Technologies Company, Ltd.’s Disclosure of Asserted Claims and Infringement Contentions, dated May 6, 2024, in <i>Yangtze Memory Technologies Company, Ltd. v. Micron Technology, Inc. and Micron Consumer Products Group, LLC</i> , Case No. 3:23-cv-05792-RFL
1041	Declaration of Jared Bobrow in Support of Petitioner’s Motion for Admission <i>Pro Hac Vice</i>

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. 1041, “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 36 years. Bobrow Declaration ¶ 1. Mr. Bobrow has been litigating patent cases for over 34 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. 10,937,806 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: July 19, 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 July 19, 2024 via electronic mail, upon the following attorneys of record for the Patent Owner:

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