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.: IPR2025-00034
U.S. Patent No. 10,879,254

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. 10,879,254 to Guo et al. ("the '254 Patent")
1002	File History of U.S. Patent No. 10,879,254 ("the '254 FH")
1003	Declaration of Dr. Jack C. Lee ("Lee")
1004	*Curriculum Vitae* of Dr. Jack C. Lee
1005	U.S. Patent No. 10,777,501 to Nakajima et al. ("Nakajima")
1006	U.S. Patent Publ. No. 2019/0198524 to Fujiki et al. ("Fujiki")
1007	U.S. Patent No. 10,658,378 to Tao et al.
1008	Micheloni, "3D Flash Memories" (2016)
1009	U.S. Patent Publ. No. 2017/0179026 to Toyama et al. ("Toyama")
1010	U.S. Patent No. 10,354,980 to Mushiga et al. ("Mushiga")
1011	U.S. Patent Publ. No. 2019/0229125 to Zhou et al.
1012	PCT Publication No. WO 2019/042103 A1 to Dai et al.
1013	U.S. Patent No. 10,679,721 to Kim et al.
1014	Aritome, "NAND Flash Memory Technologies" ("Aritome")
1015	U.S. Patent No. 10,290,643 to Kai et al. ("Kai")
1016	U.S. Patent No. 9,859,297 to Park et al. ("Park")
1017	U.S. Patent Publ. No. 2018/0308559 to Kim et al. ("Kim")
1018	U.S. Patent No. 8,945,996 to Tang et al.
1019	U.S. Patent No. 10,115,632 to Masamori et al.
1020	U.S. Patent No. 5,945,717 to Chevallier

Exhibit	Description
1021	U.S. Patent No. 10,347,487 to Lee et al.
1022	Ronse, "Optical lithography—a historical perspective," C. R. Physique 7 (2006) ("Ronse")
1023	U.S. Patent Publ. No. 2019/0081061 to Tessariol et al. ("Tessariol")
1024	U.S. Patent No. 9,620,514 to Kai et al.
1025	Hwang, "Atomic Layer Deposition for Semiconductors," Springer (2014) ("Hwang")
1026	U.S. Patent No. 10,515,799 to Wang et al.
1027	U.S. Patent No. 9,570,460 to Kanakamedala et al.
1028	U.S. Patent No. 9,728,546 to Serov et al.
1029	Excerpt from YMTC's Exemplary Infringement Claim Chart for U.S. Patent No. 10,879,254 (Ex. A-2 to Disclosure of YMTC II Asserted Claims and Infringement Contentions, dated October 2, 2024) ("Ex. A-2, YMTC's Contentions") [PROTECTIVE ORDER MATERIAL – FILED UNDER SEAL]
1030	U.S. Patent No. 11,075,084 to Shen et al.
1031	U.S. Patent No. 10,304,852 to Cui et al. ("Cui")
1032	U.S. Patent No. 9,793,139 to Sharangpani et al.
1033	Minute Order (case schedule), Dkt. No. 141, dated September 18, 2024 in *Yangtze Memory Technologies Company, Ltd. v. Micron Technology, Inc. and Micron Consumer Products Group, LLC*, Case No. 3:23-cv-05792-RFL
1034	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

Exhibit	Description
1035	Plaintiff and Counterclaim Defendant Yangtze Memory Technologies Company, LTD.'s Disclosure of YMTC II Asserted Claims and Infringement Contentions, dated October 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
1036	Docket from *Yangtze Memory Technologies Company, Ltd. v. Micron Technology, Inc. and Micron Consumer Products Group, LLC*, Case No. 3:24-cv-04223-RFL which has been consolidated with Case No. 3:23-cv-05792-RFL
1037	INTENTIONALLY OMITTED
1038	INTENTIONALLY OMITTED
1039	INTENTIONALLY OMITTED
1040	INTENTIONALLY OMITTED
1041	INTENTIONALLY OMITTED
1042	INTENTIONALLY OMITTED
1043	INTENTIONALLY OMITTED
1044	INTENTIONALLY OMITTED
1045	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. 1045, "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. 10,879,254 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: January 15, 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 January 15, 2025 via electronic mail, upon the following attorneys of record for the Patent Owner:

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/*Valerie Cloyd*/
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