Filed on behalf of: Yangtze Memory Technologies Company, Ltd.

Entered: August 7, 2025

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 IPR2025-00034
Patent 10,879,254

PATENT OWNER'S OBJECTIONS TO PETITIONER'S EVIDENCE

Pursuant to 37 C.F.R. § 42.64(b)(1), Patent Owner Yangtze Memory Technologies Company, Ltd. ("Patent Owner") submits the following objections to the evidence relied on by Petitioner Micron Technology, Inc. ("Petitioner"). Patent Owner's objections apply equally to Petitioner's reliance on this evidence in any subsequently filed documents or further proceedings in this matter. These objections are timely, having been filed and served within five business days of service of evidence. Notwithstanding these objections, Patent Owner expressly reserves the right to rely on any evidence submitted by Petitioner, including on the ground that such evidence constitutes a party admission.

Objections

Exhibit 1047

Patent Owner objects to this exhibit as inadmissible hearsay under FRE 801 and 802 not falling under any exception, and as improper expert testimony under FRE 702 and 703, to the extent it impermissibly acts as a conduit for hearsay, including the hearsay objected to herein, and does not rely on the kinds of facts or data that experts in the relevant fields would reasonably rely on in forming an opinion on the subject without providing the underlying facts, data, and other required disclosures.

Patent Owner further objects to this exhibit for lack of foundation and lack of personal knowledge under FRE 602, and as improper lay testimony under FRE 701,

to the extent it offers testimony in areas outside of Mr. Lang's area of expertise or fails to properly provide the underlying facts, data, and other required disclosures.

Patent Owner further objects to the timing of Petitioner's service of Exhibit 1047. Under 37 CFR § 42.64(b)(2), supplemental evidence other than deposition evidence must be served within 10 business days of service of Patent Owner's objections, which were served on June 2, 2025 (Paper 23). Thus, any supplemental evidence Petitioner wanted to serve in response to Patent Owner's objections had to be served by June 16, 2025, ten business days after June 2, 2025. However, Petitioner did not serve Exhibit 1047 until July 31, 2025. Thus, Exhibit 1047 was not timely served under 37 CFR § 42.64(b)(2).

Respectfully submitted,

Dated: August 7, 2025

By: / Inge A. Osman /

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Yangtze Memory Technologies Company, Ltd.

CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6(e), I certify that on this 7th day of August, 2025, a true and correct copy of the foregoing **Patent Owner's Objections to Petitioner's Evidence** was served by electronic mail on Petitioner's lead and backup counsel at the following email addresses:

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