

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

YANGTZE MEMORY TECHNOLOGIES COMPANY, LTD.

Petitioner,

v.

MICRON TECHNOLOGY, INC.

Patent Owner.

Case IPR2025-00099
Patent 10,872,903

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

LIST OF EXHIBITS

Exhibit	Description
1001	U.S. Patent No. 10,872,903 (“’903”)
1002	File History of U.S. Patent Application No. 16/716,177 (“’903FH”)
1003	Declaration of Dr. Kelin Kuhn in Support of Petition for <i>Inter Partes</i> Review of U.S. Patent No. 10,872,903 (“Kuhn”)
1004	Certified Translation of Korean Patent Application Publication No. 10-2010-0034612 (“Ahn”)
1005	Korean Patent Application Publication No. 10-2010-0034612
1006	U.S. Patent Application Publication No. 2009/0146190 (“Fukuzumi”)
1007	U.S. Patent Application Publication No. 2009/0283819 (“Ishikawa”)
1008	U.S. Patent No. 5,596,523 (“Endoh”)
1009	U.S. Patent No. 6,765,825 (“Scott”)
1010	U.S. Patent Application Publication No. 2010/0240205 (“Son”)
1011	U.S. Patent Application Publication No. 2009/0242967 (“Katsumata”)
1012	U.S. Patent Application Publication No. 2009/0310425 (“Sim”)
1013	U.S. Patent Application Publication No. 2010/0019310 (“Sakamoto”)
1014	Joint Claim Construction and Prehearing Statement (Patent Local Rule 4-3), <i>Yangtze Memory Technologies Co. Ltd. v. Micron Technology, Inc. and Micron Consumer Products Group, LLC.</i> , No. 3:23-cv-05792-RFL, D.I. 105 (N.D. Cal. August 19, 2024)
1015	“Extended Data Retention Process Technology for Highly Reliable Flash EEPROMs of 10^6 to 10^7 W/E Cycles” by F. Arai et al. (1998)
1016	“A High-Endurance (>100K) BE-SONOS NAND Flash With a Robust Nitrided Tunnel Oxide/Si Interface” by S. Wang et al. (2010)

1017	“Flash Memory Reliability NEPP 2008 Task Final Report” by Y. Chen (2009)
1018	Counterclaim Plaintiff Micron Technology’s Disclosure of Asserted Claims and Infringement Contentions and Document Production Accompanying Disclosure (Patent Local Rules 3-1 and 3-2), <i>Yangtze Memory Technologies Co. Ltd. v. Micron Technology, Inc. and Micron Consumer Products Group, LLC.</i> , No. 3:23-cv-05792- RFL (N.D. Cal.)
1019	U.S. Patent Application Publication No. 2008/0116441A1 (Raghuram)
1020	“Growth characteristics and electrical resistivity of chemical vapor-deposited tungsten film” by I-Shun Chang (1998)
1021	Scheduling Order, <i>Yangtze Memory Technologies Co. Ltd. v. Micron Technology, Inc. and Micron Consumer Products Group, LLC.</i> , No. 3:23-cv-05792-RFL, D.I. 141 (N.D. Cal. Sept. 18, 2024)
1022	“Nitride Engineering and the Effect of Interfaces on Charge Trap Flash Performance and Reliability” by Sandhya C. (2008)
1023	Excerpts of “Polycrystalline Silicon for Integrated Circuits and Displays” by Ted Kamins (1998)
1024	Print-out of IEEE webpage (dated November 8, 2024)
1025	U.S. Patent No. 7,425,742 (Nazarian)
1026	U.S. Patent Application Publication No. 2007/0057328 (“Taniguchi”)
1027	“Shrinking Possibilities” by B. Arnold (2009)
1028	Press Release, U.S. Department of Commerce, <i>Department of Commerce Awards CHIPS Incentives to Micron for Idaho and New York Projects and Announces Preliminary Memorandum of Terms for Virginia DRAM Project to Secure Domestic Supply of Legacy Memory Chips</i> (Dec. 10, 2024) available at: https://www.commerce.gov/news/press-releases/2024/12/department-commerce-awards-chips-incentives-micron-idaho-and-new-york (last accessed Apr. 9, 2025)

1029	IPR2025-00245 (<i>Micron Technology, Inc., v. Yangtze Memory Technologies Company, Ltd.</i>), Paper 1 (excerpt)
1030	IPR2024-00370 (<i>Micron Technology v. Netlist Inc.</i>), Paper 1 (excerpt)
1031	Printout, Bureau of Industry and Security, <i>Entity List FAQs</i> (2024) available at: https://www.bis.doc.gov/index.php/component/fsj_faqs/cat/33-entity-list-faqs (last accessed Apr. 9, 2025)
1032	87 Fed. Reg. 77505 (December 19, 2022), <i>Additions and Revisions to the Entity List and Conforming Removal From the Unverified List</i>
1033	Printout, Yahoo Finance, <i>Micron Technology Inc. (MU)</i> , available at https://finance.yahoo.com/quote/MU/holders/ (last accessed Apr. 9, 2025)
1034	Printout, Slashgear, <i>The Real Owners Behind the World's Biggest Tech Companies</i> , available at: https://www.slashgear.com/1669177/biggest-tech-companies-who-really-owns/ (last accessed Apr. 11, 2025)
1035	Declaration Of Andrew Radsch In Support Of Motion For <i>Pro Hac Vice</i> Admission

Yangtze Memory Technologies Company, Ltd. (“Petitioner”), respectfully requests *pro hac vice* admission of Andrew Radsch as counsel in this proceeding.

I. BACKGROUND

Petitioner 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 December 12, 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 Petitioner (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 10,872,903 and the issues involved in this case. Petitioner Yangtze Memory Technologies Co. Ltd. has requested Mr. Radsch represent it in these proceedings. Counsel for Patent Owner does not oppose Mr. Radsch appearing *pro hac vice* during this proceeding.

III. AFFIDAVIT OR DECLARATION OF INDIVIDUAL SEEKING TO APPEAR

Petitioner's Unopposed Motion for *Pro Hac Vice* Admission is accompanied by an Affidavit of Mr. Radsch.

V. CONCLUSION

Therefore, Petitioner 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 PETITIONER'S UNOPPOSED MOTION FOR *PRO HAC VICE* ADMISSION OF ANDREW RADSCH and EXHIBIT 1035 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 Patent Owner listed below:

Lead Counsel	Back-up Counsel
Jeremy Jason Lang Registration No. 73,604 (jjlang@orrick.com) Postal & Hand-Delivery Address: Orrick, Herrington & Sutcliffe LLP 51 West 52nd Street New York, NY 10019 T: 212-506-5000; F: 212-506-5151 PTABDocketJJL2@orrick.com PTABDocketJ3B3@orrick.com T61PTABDocket@orrick.com micron-ymtc_ohs@orrick.com	Jared Bobrow <i>Pro Hac Vice</i> (jbobrow@orrick.com) Travis Jensen Registration No. 60,087 (tjensen@orrick.com)
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Dated: July 9, 2025

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