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YANGTZE MEMORY TECHNOLOGIES, INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

YANGTZE MEMORY TECHNOLOGIES COMPANY, LTD., Plaintiff, v. MICRON TECHNOLOGY, INC., and MICRON CONSUMER PRODUCTS GROUP, LLC, Defendants.	Case No. 3:23-cv-05792-RFL **PLAINTIFF AND COUNTERCLAIM DEFENDANT YANGTZE MEMORY TECHNOLOGIES COMPANY, LTD.'S DISCLOSURE OF *YMTC II* ASSERTED CLAIMS AND INFRINGEMENT CONTENTIONS**
MICRON TECHNOLOGY, INC., Counterclaim Plaintiff, v. YANGTZE MEMORY TECHNOLOGIES COMPANY, LTD., and YANGTZE MEMORY TECHNOLOGIES, INC., Counterclaim Defendants.	

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Yangtze Memory Technologies Company, Ltd., ("YMTC") hereby provides its disclosure of asserted claims and infringement contentions relating to the *YMTC II* patents and accompanying document production pursuant to D.I. 141 and Patent Local Rules 3-1 and 3-2 to Micron Technology, Inc., and Micron Consumer Products Group, LLC, ("Micron"). YMTC expressly reserves the right to supplement its contentions, including the identification of additional accused products and additional claims that Micron infringes, based on additional information obtained in discovery and/or the Court's claim construction order, or based upon any other relevant development in this case.

1. 3-1 Disclosure of Asserted Claims and Infringement Contentions

(a) Each claim of each patent in suit that is allegedly infringed by each opposing party, including for each claim the applicable statutory subsections of 35 U.S.C. §271 asserted

Based on presently available information, YMTC contends that Micron has infringed under 35 U.S.C. §§ 271(a), (b), and (g) at least the following claims:

- Claims 1-15, 17-18, and 20 of U.S. Patent No. 10,879,254
- Claims 1-20 of U.S. Patent No. 11,581,322
- Claims 1-12, 14-20 of U.S. Patent No. 10,886,291
- Claims 1-3, 7-8, 10, 11, 13, 15-18, and 20 of U.S. Patent No. 11,482,532
- Claims 17, 19, and 20 of U.S. Patent No. 11,145,666
- Claims 1-5, 8-13, 15-20 of U.S. Patent No. 11,450,604
- Claims 1-6 and 8-19 of U.S. Patent No. 10,672,711
- Claims 1-5, 7-15, and 17-18 of U.S. Patent No. 11,101,276
- Claims 1-14 of U.S. Patent No. 11,568,941
- Claims 1-14 of U.S. Patent No. 10,879,164
- Claims 1, 3-7, and 12-20 of U.S. Patent No. 12,010,838

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(b) Separately for each asserted claim, each accused apparatus, product, device, process, method, act, or other instrumentality ("Accused Instrumentality") of each opposing party of which the party is aware

The Accused Products include all of Micron's 96-Layer NAND products, which include both individual NAND chips and products incorporating the same (the "96L Accused Products"). Such products include, but are not limited to, Micron SSD model 1300 SATA, and the Micron SSD model c200, and products with part or die name or number B27A, as well other memory chips (and memory products containing the same) that have the same or similar structures, features, or functionalities, and/or are made by the same or similar manufacturing processes as the aforementioned exemplary products. Because Micron does not publish or publicize a complete list of its products made using its 96L technology, and because Micron has not yet responded to discovery requesting this information, YMTC is not able to provide a complete list at this time. Micron is uniquely in possession of the identification of its products corresponding to this particular generation of products, which is accused.

The Accused Products include all of Micron's 128-Layer NAND products, which include both individual NAND chips and products incorporating the same (the "128L Accused Products"). Such products include, but are not limited to, Micron BX500 2.5 480GB SSD, and products with part or die name or number B37R, as well other memory chips (and memory products containing the same) that have the same or similar structures, features, or functionalities, and/or are made by the same or similar manufacturing processes as the aforementioned exemplary products. Because Micron does not publish or publicize a complete list of its products made using its 128L technology, and because Micron has not yet responded to discovery requesting this information, YMTC is not able to provide a complete list at this time. Micron is uniquely in possession of the identification of its products corresponding to this particular generation of products, which is accused.

The Accused Products include all of Micron's 176-Layer NAND products, which include both individual NAND chips and products incorporating the same (the "176L Accused Products"). Such products include, but are not limited to, Micron SSD model 3400 NVMe, Micron SSD model 3400 NVMe and the Micron SSD model 2400 PCIe Gen 4 and products with part or die name or number

N48R or B47R, as well other memory chips (and memory products containing the same) that have the same or similar structures, features, or functionalities, and/or are made by the same or similar manufacturing processes as the aforementioned exemplary products. Because Micron does not publish or publicize a complete list of its products made using its 176L technology, and because Micron has not yet responded to discovery requesting this information, YMTC is not able to provide a complete list at this time. Micron is uniquely in possession of the identification of its products corresponding to this particular generation of products, which is accused.

The Accused Products include all of Micron's 232-Layer NAND products, which include both individual NAND chips and products incorporating the same (the "232L Accused Products"). Such products include, but are not limited, to Micron SSD model 2550 and products with part or die name or number B58R, as well other memory chips (and memory products containing the same) that have the same or similar structures, features, or functionalities, and/or are made by the same or similar manufacturing processes as the aforementioned exemplary products. Because Micron does not publish or publicize a complete list of its products made using its 232L technology, and because Micron has not yet responded to discovery requesting this information, YMTC is not able to provide a complete list at this time. Micron is uniquely in possession of the identification of its products corresponding to this particular generation of products, which is accused.

The Accused Products include all of Micron's 276-Layer NAND products, which include both individual NAND chips and products incorporating the same (the "276L Accused Products"). Such products include, but are not limited, to Micron SSD model 2650 NVMe, as well other memory chips (and memory products containing the same) that have the same or similar structures, features, or functionalities, and/or are made by the same or similar manufacturing processes as the aforementioned exemplary products. Because Micron does not publish or publicize a complete list of its products made using its 276L technology, and because Micron has not yet responded to discovery requesting this information, YMTC is not able to provide a complete list at this time. Micron is uniquely in possession of the identification of its products corresponding to this particular generation of products, which is accused.

The Accused Products include all of Micron's DDR5 DRAM products, which include both individual DDR5 DRAM chips and products incorporating the same (the "DRAM Accused Products"). Such products include, but are not limited to, the Micron Y2BM, as well other memory chips (and memory products containing the same) that have the same or similar structures, features, or functionalities, and/or are made by the same or similar manufacturing processes as the aforementioned exemplary products. Because Micron does not publish or publicize a complete list of its products made using its DDR5 DRAM technology, and because Micron has not yet responded to discovery requesting this information, YMTC is not able to provide a complete list at this time. Micron is uniquely in possession of the identification of its products corresponding to this particular generation of products, which is accused.

Patent/Claims	Accused Instrumentality
U.S. Patent No. 10,879,254, Claims 1-15, 17-18, 20	Manufacture of 128L Accused Products Manufacture of 176L Accused Products Manufacture of 232L Accused Products Manufacture of 276L Accused Products
U.S. Patent No. 11,581,322, Claims 1-20	128L Accused Products 176L Accused Products 232L Accused Products 276L Accused Products
U.S. Patent No. 10,886,291, Claims 1-10	Manufacture of 96L Accused Products Manufacture of 276L Accused Products
U.S. Patent No. 10,886,291, Claims 11-12, 14-20	96L Accused Products 276L Accused Products
U.S. Patent No. 11,482,532, Claims 1-3, 7-8, 10	Manufacture of 96L Accused Products Manufacture of 276L Accused Products

U.S. Patent No. 11,482,532, Claims 11, 13, 15-18, 20	96L Accused Products 276L Accused Products
U.S. Patent No. 11,145,666, Claims 17, 19-20	128L Accused Products 176L Accused Products 276L Accused Products
U.S. Patent No. 11,450,604, Claims 1-5, 8-13	232L Accused Products 276L Accused Products
U.S. Patent No. 11,450,604, Claims 15-20	Manufacture of 232L Accused Products Manufacture of 276L Accused Products
U.S. Patent No. 10,672,711, Claims 1-6, 8-19	232L Accused Products 276L Accused Products
U.S. Patent No. 11,101,276, Claims 1-5, 7-15, 17-18	Manufacture of 232L Accused Products Manufacture of 276L Accused Products
U.S. Patent No. 11,568,941, Claims 1-4	176L Accused Products 232L Accused Products 276L Accused Products
U.S. Patent No. 11,568,941, Claims 5-14	Use of 176L Accused Products Use of 232L Accused Products Use of 276L Accused Products
U.S. Patent No. 10,879,164, Claim 1-7	DRAM Accused Products
U.S. Patent No. 10,879,164, Claim 8-14	Manufacture of DRAM Accused Products
U.S. Patent No. 12,010,838, Claims 1, 3-7, 12-20	128L Accused Products 176L Accused Products 276L Accused Products

The 96L Accused Products, 128L Accused Products, 176L Accused Products, 232L Accused Products, 276L Accused Products, and DRAM Accused Products are collectively the "Accused

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Products" or "Accused Instrumentalities." The Accused Products include any other Micron products with the same or similar functionality as the foregoing.

The identification of the Accused Products is based on information reasonably available to YMTC at this time. Micron does not publish the names of all of its products and component parts, and it does not identify all procedures used in manufacture. YMTC has served Interrogatories and Requests for Production to identify such products and procedures, to which Micron has not yet adequately and fully responded. YMTC reserves the right to supplement these Infringement Contentions based on information developed in the course of this lawsuit through discovery or additional factual investigation, in view of the Court's claim construction rulings, or as other circumstances may require. Specifically, should discovery reveal that Micron has committed acts of infringement related to any products or processes other than those listed above, YMTC reserves the right to supplement these contentions.

(c) A chart identifying specifically where and how each limitation of each asserted claim is found within each Accused Instrumentality, including for each limitation that such party contends is governed by 35 U.S.C. § 112(6), the identity of the structure(s), act(s), or material(s) in the Accused Instrumentality that performs the claimed function

The Accused Products practice the asserted claims as shown in the claim charts attached hereto as Exhibits A-1, A-2, A-3, B-1, B-2, B-3 C-1, D-1, E-1, E-2, F-1, G-1, H-1, I-1, I-2, J-1, K-1, and K-2 (collectively, "Exhibits A-K"). Any citations to documentation or other evidence in the attached claim charts are exemplary and not exhaustive, as are the examples provided of the ways in which the Accused Products satisfy the elements of each of the asserted claims. Moreover, any and all citations or references to documentation or other evidence should be understood to encompass any and all prior versions that incorporate the same or similar functionality, as well as any similar or derivative products which YMTC has been unable to discover from publicly available information to this point. The identified infringing regions, structures, and/or elements are exemplary and are not intended to be exhaustive.

YMTC is likely to have additional evidentiary support regarding Micron's infringement after a reasonable opportunity for further investigation and discovery, as discovery has only recently begun. YMTC reserves the right to supplement these Infringement Contentions based on information developed in the course of this lawsuit through discovery or additional factual investigation, in view of the Court's claim construction ruling, or as other circumstances may require.

(d) For each claim which is alleged to have been indirectly infringed, an identification of any direct infringement and a description of the acts of the alleged indirect infringer that contribute to or are inducing that direct infringement. Insofar as alleged direct infringement is based on joint acts of multiple parties, the role of each such party in the direct infringement must be described

YMTC contends that Micron has actively induced infringement of each of the asserted claims and has done so since at least the original Complaint, by actively encouraging others to infringe (such infringement by others being by way of using, selling, offering to sell, or importing into the United States the Accused Products). Since at least the filing of the original *YMTC II* Complaint in this action, Micron has known of the asserted *YMTC II* claims and its infringement thereof. Since before the filing of the original *YMTC II* and *YMTC I* Complaints, Micron has had knowledge of YMTC's patent portfolio with respect to semiconductor technology and that portfolio's relevance and application to Micron's own products. Accordingly, discovery may reveal the Micron knew of the asserted patents and Micron's unauthorized use thereof even before the filing of the original *YMTC II* Complaint.

YMTC contends that the direct infringers whom Micron has induced to infringe include Micron's authorized distributors, particularly those in the United States (*see* listing of those entities at https://www.micron.com/sales-support/sales-network/authorized-distributors); other distributors of Micron's Accused Products; importers of the Accused Products; OEMs; ODMs; consumer and other electronics manufacturer customers of Micron who use or sell the Accused Products in the United States; any of Micron's other customers, vendors, retailers, or consignees, who use, sell, offer to sell in the United States, or import into the United States, the Accused Products; and end users of Micron's

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Accused Products (standing alone or as incorporated into other products) who have used an Accused Product in the United States.

YMTC contends that Micron has actively induced infringement of each of the asserted claims has done so by acts including but not limited to (1) selling or distributing for resale in the United States (whether alone or integrated into other downstream products) the Accused Products; (2) encouraging use of the Accused Products in the United States through marketing, advertising, and other promotional activities, targeted at a United States audience; (3) providing instructions, technical support, and other support and encouragement for the use the Accused Products in downstream devices; (4) meeting with customers to encourage them to use the Accused Products in products to be sold in the United States; (5) engaging in and securing design wins for products to be sold in the United States; (6) testing and qualifying the Accused Products with customers in the United States; and (7) taking all other active steps to encourage the use of the Accused Products in the United States, and their importation by others into the United States.

Micron knows (or believes that there is a high probability, but has taken deliberate steps to avoid knowing, including by not adequately investigating the allegations against it) that its actions are inducing infringement and are intended to induce infringement.

(e) Whether each limitation of each asserted claim is alleged to be literally present or present under the doctrine of equivalents in the Accused Instrumentality

At this time, and except as otherwise expressly noted in the claim chart, YMTC contends and reasonably believes that all limitations of the Asserted Claims are present literally. To the extent that any specific limitation of the Asserted Claims is found to not be present literally, then YMTC contends that, if there are any differences between the claim elements and the Accused Products, the charts attached as Exhibits A-K identify illustrative support for where the equivalent feature is found under the doctrine of equivalents pursuant to the function-way-result and/or insubstantial differences tests.

(f) For any patent that claims priority to an earlier application, the priority date to which each asserted claim allegedly is entitled

YMTC asserts that the asserted patents are entitled to claim priority to at least the following applications:

- U.S. Patent No. 10,879,254: U.S. App. No. 16/149,103, filed Oct. 1, 2018; and International App. No. PCT/CN2018/101482, filed Aug. 21, 2018
- U.S. Patent No. 11,581,322: U.S. App. No. 16/745,342, filed Jan. 17, 2020; U.S. App. No. 16/149,103, filed Oct. 1, 2018; and International App. No. PCT/CN2018/101482, filed Aug. 21, 2018
- U.S. Patent No. 10,886,291: International App. No. PCT/CN2018/077785, filed Mar. 1, 2018; CN 2017/10134782, filed on Mar. 8, 2017, and CN 2017/10134783, filed on Mar. 8, 2017
- U.S. Patent No. 11,482,532: International App. No. PCT/CN2018/077785, filed Mar. 1, 2018; U.S. App. No. 16/046,847, filed July 26, 2018; CN 2017/10134782.1, filed on Mar. 8, 2017, and CN 2017/10134783, filed on Mar. 8, 2017
- U.S. Patent No. 11,145,666: International App. No. PCT/CN2018/098962, filed Aug. 6, 2018; U.S. App. No. 16/126,956, filed Sept. 10, 2018; and CN 2017/10750398, filed on Aug. 28, 2017
- U.S. Patent No. 11,450,604: International App. No. PCT/CN2020/094658, filed June 5, 2020; and U.S. App. No. 16/944,857, filed on Jul. 31, 2020
- U.S. Patent No. 10,672,711: International App. No. PCT/CN2018/101308, filed Aug. 20, 2018; and CN 2017/10774754, filed Aug. 31, 2017
- U.S. Patent No. 11,101,276: U.S. App. No. 16/126,947, filed Sep. 10, 2018; International App. No. PCT/CN2018/101308, filed Aug. 20, 2018; and CN 2017/10774754, filed Aug. 31, 2017
- U.S. Patent No. 11,568,941: U.S. Patent App. No. 16/827,734, filed March 24, 2020; International App. No. PCT/CN2020/074580, filed Feb. 10, 2020

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- U.S. Patent No. 10,879,164: International App. No. PCT/CN2018/113271, filed Nov. 1, 2018
- U.S. Patent No. 12,010,838: U.S. App. No. 16/995,858, filed May 28, 2020; U.S. App. No. 16/126,956, filed Sept. 10, 2018; International App. No. PCT/CN2018/098962, filed Aug. 6, 2018; and CN 2017/10750398, filed on Aug. 28, 2017

(g) If a party claiming patent infringement wishes to preserve the right to rely, for any purpose, on the assertion that its own or its licensee's apparatus, product, device, process, method, act, or other instrumentality practices the claimed invention, the party shall identify, separately for each asserted claim, each such apparatus, product, device, process, method, act, or other instrumentality that incorporates or reflects that particular claim

YMTC is not currently relying on any such apparatus, product, or device.

(h) Identify the timing of the point of first infringement, the start of claimed damages, and the end of claimed damages

The time of first infringement is when Micron first made, used, sold, offered for sale, or imported any one of the Accused Products in the United States. YMTC is not currently aware of the specific date of first infringement but expects to receive this information from Micron in discovery. The date of first infringement is also the start of the claimed damages period which will end at the last to expire of the asserted patents.

(i) If a party claiming patent infringement alleges willful infringement, the basis for such allegation

Since at least the filing of the *YMTC II* Complaint in this action, Micron's infringement has been willful with respect to the *YMTC II* patents, as exemplified by, for example, its actions, or lack thereof—including its failure to cease its infringing conduct, to seek a license, or to assert any meaningful explanation of how it allegedly does not infringe—since having been put on notice of its infringement of the asserted patents. Further, as explained above, discovery may reveal that Micron

knew of the asserted *YMTC II* patents and Micron's unauthorized use thereof even before the filing of the original *YMTC II* Complaint, but nevertheless that Micron made the choice to continue engaging in the conduct that infringes YMTC's asserted patents. For example, since before the filing of the original *YMTC I* and *YMTC II* Complaints, Micron has had knowledge of YMTC's patent portfolio with respect to semiconductor technology and that portfolio's relevance and application to Micron's own products. Micron has also been an active financial supporter of China Tech Threat, a purported "advocacy" group, and likely has had discussions with it or its representatives about YMTC's technology, including its patented technologies, thus demonstrating Micron's knowledge about the scope of the asserted patents and their relevance to Micron's Accused Products.

Despite such knowledge, Micron has proceeded to infringe the asserted patents with full and complete knowledge of its applicability to its products without taking a license to the asserted patents and without a good faith belief that the Asserted Claims are invalid and not infringed. Thus, Micron's infringement of the asserted patents is willful and deliberate, entitling YMTC to increased damages under 35 U.S.C. § 284.

2. <u>3-2 Document Production Accompanying Disclosure</u>

(a) Documents (e.g., contracts, purchase orders, invoices, advertisements, marketing materials, offer letters, beta site testing agreements, and third party or joint development agreements) sufficient to evidence each discussion with, disclosure to, or other manner of providing to a third party, or sale of or offer to sell, or any public use of, the claimed invention prior to the date of application for the patent in suit. A party's production of a document as required herein shall not constitute an admission that such document evidences or is prior art under 35 U.S.C. § 102

YMTC has not identified any documents responsive to this category within its possession, custody, or control.

(b) All documents evidencing the conception, reduction to practice, design, and development of each claimed invention, which were created on or before the date of application for the patent in suit or the priority date identified pursuant to Patent L.R. 3-1(f), whichever is earlier

YMTC's investigation is ongoing, and YMTC will promptly produce responsive, non-privileged documents, if any, once its investigation is complete.

(c) A copy of the file history for each patent in suit

YMTC identifies the following documents related to this category: YMTC_20000089 – YMTC_20004657.

(d) All documents evidencing ownership of the patent rights by the party asserting patent infringement

YMTC identifies the following documents related to this category: YMTC_20000001 – YMTC_20000088, in addition to the documents identified above with respect to L.R. 3-2(c).

(e) If a party identifies instrumentalities pursuant to Patent L.R. 3-1(g), documents sufficient to show the operation of any aspects or elements of such instrumentalities the patent claimant relies upon as embodying any asserted claims

YMTC has not identified any instrumentalities pursuant to 3-1(g), and therefore has no documents responsive to this category.

(f) All agreements, including licenses, transferring an interest in any patent-in-suit

Apart from the documents identified in response to subpart (d), YMTC has not identified any documents responsive to this category in its possession, custody, or control.

(g) All agreements that the party asserting infringement contends are comparable to a license that would result from a hypothetical reasonable royalty negotiation

YMTC has not yet identified any such agreements in its possession, custody, or control.

(h) All agreements that otherwise may be used to support the party asserting infringement's damages case

YMTC has not yet identified any such agreements in its possession, custody, or control.

If a party identifies instrumentalities pursuant to Patent L.R. 3-1(g), documents sufficient to show marking of such embodying accused instrumentalities and if it wants to preserve the right to recover lost profits based on such products, sales, revenues, costs and profits of such embodying accused instrumentalities

YMTC has not identified any instrumentalities pursuant to 3-1(g), and therefore has no documents responsive to this category.

(i) All documents comprising or reflecting a F/RAND commitment or agreement with respect to the asserted patent(s)

YMTC has identified no documents responsive to this category in its possession, custody, or control.

Respectfully submitted,

Date: October 2, 2024

By: */s/ Kevin C. Wheeler*

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CERTIFICATE OF SERVICE

I hereby certify that this document is being served upon counsel of record for Defendant's and Counterclaim Plaintiff on October 2, 2024, via electronic service.

By: */s/ Kevin C. Wheeler*
Kevin C. Wheeler

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