

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

Entered: December 3, 2025

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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MICRON TECHNOLOGY, INC.,  
Petitioner,

v.

YANGTZE MEMORY TECHNOLOGIES COMPANY, LTD.,  
Patent Owner.

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Case IPR2025-00117  
Patent 10,672,711

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**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 1028**

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 Dr. Banerjee's area of expertise or fails to properly provide the underlying facts, data, and other required disclosures.

**Exhibits 1029-1030**

Patent Owner objects to these exhibits as being improperly directed to new evidence supporting a new theory of unpatentability not present in the Petition as required by 37 CFR § 42.22 and because any probative value, therefore, is substantially outweighed by a danger of unfair prejudice to Patent Owner under FRE 403.

**Exhibits 1031**

Patent Owner objects to this exhibit as not properly authenticated under FRE 901 because Petitioner has not presented sufficient evidence to show that it is authentic or self-authenticating under FRE 902. To the extent Petitioner relies on this document for the truth of the matter asserted, Patent Owner objects to this exhibit as inadmissible hearsay under FRE 801 and 802 that does not fall under any exceptions, including those of FRE 803, 804, 805, or 807.

**Exhibits 1032**

Patent Owner objects to this exhibit as not properly authenticated under FRE 901 because Petitioner has not presented sufficient evidence to show that it is authentic or self-authenticating under FRE 902. To the extent Petitioner relies on this document for the truth of the matter asserted, Patent Owner objects to this exhibit

as inadmissible hearsay under FRE 801 and 802 that does not fall under any exceptions, including those of FRE 803, 804, 805, or 807.

Patent Owner objects to this exhibit as being improperly directed to new evidence supporting a new theory of unpatentability not present in the Petition as required by 37 C.F.R. § 42.22 and because any probative value, therefore, is substantially outweighed by a danger of unfair prejudice to Patent Owner under FRE 403.

Respectfully submitted,

Dated: December 3, 2025

By: / Inge A. Osman /

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*Counsel for Patent Owner  
Yangtze Memory Technologies  
Company, Ltd.*

**CERTIFICATE OF SERVICE**

Pursuant to 37 C.F.R. § 42.6(e), I certify that on this 3rd day of December, 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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