

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.: IPR2025-00118
U.S. Patent No. 10,879,164
Issue Date: December 29, 2020

Title: INTEGRATED CIRCUIT ELECTROSTATIC DISCHARGE BUS
STRUCTURE AND RELATED METHOD

PETITIONER'S UPDATED EXHIBIT LIST

LISTING OF EXHIBITS

EXHIBIT NO.	DESCRIPTION
1001	U.S. Patent No. 10,879,164 to Li (“the ’164 Patent”)
1002	File History of U.S. Patent No. 10,879,164
1003	Declaration of Dr. Daniel Foty (“Foty”)
1004	<i>Curriculum Vitae</i> of Dr. Daniel Foty
1005	Japanese Unexamined Patent Application Publication No. JP2006-93598 to Yoshinaga (“Yoshinaga”)
1006	Certified Translation of Japanese Unexamined Patent Application Publication No. JP2006-93598 to Yoshinaga (“Yoshinaga”)
1007	U.S. Patent No. 9,070,700 to Haralabidis (“Haralabidis”)
1008	IC Mask Design: Essential Layout Techniques, Christopher Saint and Judy Saint, McGraw-Hill (2002) (“Saint”)
1009	Library of Congress Catalog Record for IC Mask Design: Essential Layout Techniques, Christopher Saint and Judy Saint, McGraw-Hill (2002)
1010	United States Copyright Office Record for IC Mask Design: Essential Layout Techniques, Christopher Saint and Judy Saint, McGraw-Hill (2002)
1011	U.S. Patent No. 6,078,068 (“Tamura”)
1012	U.S. Patent No. 7,129,574 (“Wu”)
1013	U.S. Patent No. 6,144,542 (“Ker”)
1014	U.S. Patent Publ. No. 2004/0140860 (“Miller”)
1015	U.S. Patent No. 7,880,310 (“Mathew”)

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EXHIBIT NO.	DESCRIPTION
1016	U.S. Patent Publ. No. 2007/0215994 (“Beauchamp”)
1017	Comprehensive Dictionary of Electrical Engineering, 2nd Ed. (2005)
1018	Wiley Electrical and Electronics Engineering Dictionary (2004)
1019	The Authoritative Dictionary of IEEE Standards Terms, 7th Ed. (2000)
1020	U.S. Patent No. 6,097,098 (“Ball”)
1021	Minute Order (case schedule), Dkt. No. 141, dated September 18, 2024 in <i>Yangtze Memory Technologies Company, Ltd. v. Micron Technology, Inc. and Micron Consumer Products Group, LLC</i> , Case No. 3:23-cv-05792-RFL
1022	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
1023	Plaintiff and Counterclaim Defendant Yangtze Memory Technologies Company, LTD.’s Disclosure of YMTC II Asserted Claims and Infringement Contentions, dated October 2, 2024 in <i>Yangtze Memory Technologies Company, Ltd. v. Micron Technology, Inc. and Micron Consumer Products Group, LLC</i> , Case No. 3:23-cv-05792-RFL
1024	Docket from <i>Yangtze Memory Technologies Company, Ltd. v. Micron Technology, Inc. and Micron Consumer Products Group, LLC</i> , Case No. 3:24-cv-04223-RFL which has been consolidated with Case No. 3:23-cv-05792-RFL
1025	YMTC’s October 2, 2024 Infringement Contentions for the ’164 Patent [FILED UNDER SEAL]

EXHIBIT NO.	DESCRIPTION
1026	C. Ito, K. Banerjee, and R. Dutton, "Analysis and Design of ESD Protection Circuits for High-Frequency/RF Applications," Proceedings of the International Symposium on Quality of Electronic Design, pp. 117-122 (2001).
1027	Uyemura, "Chip Design for Submicron VLSI," Thomson, 2006.
1028	Declaration of Jared Bobrow in Support of Petitioner's Motion for Admission <i>Pro Hac Vice</i>
1029	Email from Franchesca I. Alicea Villanueva (PTAB) regarding IPR2025-00118 – Preliminary Reply Request, dated April 8, 2025
1030	Order Granting Motion to Stay Pending <i>Inter Partes</i> Review, dated March 14, 2025 in <i>Yangtze Memory Technologies Company, Ltd. v. Micron Technology, Inc. and Micron Consumer Products Group, LLC</i> , Case No. 3:23-cv-05792-RFL
1031	RESERVED
1032	Datasheet for Philips 80C31/80C32 Microcontroller, Aug. 7, 2000
1033	Datasheet for Silicon Labs C8051F020/1/2/3 Microcontroller, Rev. 1.4, December 2003
1034	Datasheet for Texas Instruments MSP430G2x53 Mixed-Signal Microcontroller, May 2013
1035	Datasheet for Zilog Z8 Encore! XP® F64xx Series, 2014
1036	Datasheet for PL-2303HX Edition USB to Serial Bridge Controller, Prolific, May 23, 2006
1037	<i>Getting to the Bottom of Deep Submicron II: A Global Wiring Paradigm</i> , D. Sylvester et al., 1999

EXHIBIT NO.	DESCRIPTION
1038	Deposition Transcript of Dr. Sunil Khatri, December 3, 2025
1039	U.S. Patent No. 6,424,263 (“Lee”)
1040	U.S. Patent No. 7,375,978 (“Conner”)
1041	U.S. Patent Publ. No. 2007/0029661 (“Beddingfield”)
1042	Supplemental Declaration of Dr. Daniel Foty (“Foty_Supp.”)
1043	<i>The Microelectronic Wire Bond: Past, Present, and Future</i> , H.K. Charles <i>et al.</i> , IMAPS 2010 - 43rd International Symposium on Microelectronics
1044	U.S. Patent No. 6,110,816 (“Huang”)
1045	<i>Research Progress on Bonding Wire for Microelectronic Packaging</i> , H. Zhou <i>et al.</i> , Micromachines vol. 14, pp. 232 – 255 (2023)
1046	RESERVED FOR FUTURE USE
1047	RESERVED FOR FUTURE USE
1048	RESERVED FOR FUTURE USE
1049	RESERVED FOR FUTURE USE
1050	RESERVED FOR FUTURE USE
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1053	RESERVED FOR FUTURE USE
1054	RESERVED FOR FUTURE USE
1055	RESERVED FOR FUTURE USE

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EXHIBIT NO.	DESCRIPTION
1056	Petitioner's Hearing Demonstratives

Respectfully submitted,

Dated: March 5, 2026

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CERTIFICATE OF SERVICE

The undersigned hereby confirms that the foregoing paper was caused to be served on March 5, 2026 via electronic mail, upon the following attorneys of record for the Patent Owner

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