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 IPR2025-00190
Patent 11,568,941

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 ten business days of institution of trial. 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 1004

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

Exhibits 1028-1034, 1036, 1038, 1039, 1041, 1043, 1044, 1045, 1047, 1050, 1052, 1054, 1056, 1058, 1060, 1062-1068, 1070-1072, 1075, 1076

To the extent Petitioner relies on this exhibit for the truth of the matter asserted, Patent Owner objects to these exhibits 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 1028-1077

Patent Owner objects to these exhibits under Fed. R. Evid. 401 and 402 as lacking relevance. These exhibits are irrelevant at least because they do not make any fact more or less probable than it would be without the evidence. Patent Owner objects to these exhibits because any probative value of the documents are substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the factfinder, wasting time, and needlessly presenting cumulative evidence under Fed. R. Evid. 403.

Exhibits 1009-1011, 1022, 1024, 1028-1029, 1031-1035, 1037, 1039-1040, 1042, 1044-1046, 1049, 1051, 1053, 1055, 1057, 1059, 1061, 1063-1067, 1069, 1075, 1077

Patent Owner objects to these exhibits as not properly authenticated under FRE 901 because Petitioner has not presented sufficient evidence to show that they are authentic or self-authenticating under FRE 902. To the extent Petitioner relies

on these documents for the truth of the matter asserted, Patent Owner objects to these exhibits as inadmissible hearsay under FRE 801 and 802 that do not fall under any exceptions, including those of FRE 803, 804, 805, or 807.

Respectfully submitted,

Dated: August 7, 2025

By: / Inge A. Osman /

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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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