

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

Entered on: April 21, 2026

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.

IPR2025-00190
Patent 11,568,941

PATENT OWNER'S UPDATED EXHIBIT LIST

Pursuant to 37 C.F.R. § 42.63(e), Patent Owner respectfully submits the following updated Exhibit List:

Ex.	Description
2001	Defendants' Preliminary Invalidity Contentions and Document Production Accompanying Invalidity Contentions re YMTC II Asserted Patents (Patent Local Rules 3-3 and 3-4), <i>Yangtze Memory Technologies Company, Ltd. v. Micron Technology, Inc.</i> , No. 3:23-cv-05792-RFL (N.D. Cal. Nov. 25, 2024) (excerpts)
2002	Civil Minutes, <i>Yangtze Memory Technologies Company, Ltd. v. Micron Technology, Inc.</i> , No. 3:23-cv-05792-RFL (N.D. Cal. Sept. 18, 2024), ECF No. 141
2003	Order Granting Stipulation to Extend Certain Deadlines Pursuant to Patent L.R. 4-2 and the Scheduling Order (ECF No. 141) Pursuant to Civil Local Rule 6-1(b), <i>Yangtze Memory Technologies Company, Ltd. v. Micron Technology, Inc.</i> , No. 3:23-cv-05792-RFL (N.D. Cal. Jan. 8, 2025), ECF No. 194
2004	Order Granting Motion to Stay Case Pending <i>Inter Partes</i> Review, <i>Yangtze Memory Technologies Company, Ltd. v. Micron Technology, Inc.</i> , No. 3:23-cv-05792-RFL (N.D. Cal. Mar. 14, 2025), ECF No. 243
2005	Plaintiff/Counterclaim Defendant Yangtze Memory Technologies Company, Ltd.'s and Counterclaim Defendant Yangtze Memory Technologies, Inc.'s Opposition to Micron's Motion to Stay Case Pending <i>Inter Partes</i> Review and Post-Grant Proceedings, <i>Yangtze Memory Technologies Company, Ltd. v. Micron Technology, Inc.</i> , No. 3:23-cv-05792-RFL (N.D. Cal. Feb. 3, 2025), ECF No. 221
2006	Declaration of Dr. Sunil P. Khatri, Ph.D. In Support Of Patent Owner's Preliminary Response ("Khatri")
2007	<i>Curriculum Vitae</i> of Dr. Sunil P. Khatri

Ex.	Description
2008	Soon-Moon Jung et al., <i>Three Dimensionally Stacked NAND Flash Memory Technology Using Stacking Single Crystal Si Layers on ILD and TANOS Structure for Beyond 30nm Node</i> , 2006 International Electron Devices Meeting Technical Digest (“Jung”)
2009	Erh-Kun Lai et al., <i>A Multi-Layer Stackable Thin-Film Transistor (TFT) NAND-Type Flash Memory</i> , 2006 International Electron Devices Meeting Technical Digest (“Lai 2006”)
2010	Declaration of E. Fred Schubert, Ph.D. in Support of Defendants’ Proposed Claim Constructions (Patent Local Rule 4-3), <i>Yangtze Memory Technologies Company, Ltd. v. Micron Technology, Inc.</i> , No. 3:23-cv- 05792-RFL (N.D. Cal. Jan. 31, 2025) (“Schubert Decl.”) (excerpts)
2011	U.S. Patent Application Publication No. 2016/0071595 A1 (“Dong III”)
2012	U.S. Patent Application Publication No. 2019/0006021 A1 (“Ghai”)
2013	Excerpts from <i>The Merriam-Webster Dictionary</i> (2016) (“2016 Merriam-Webster Dictionary”)
2014	Excerpts from <i>The American Heritage Dictionary of the English Language</i> (5th ed. 2018) (“2018 American Heritage Dictionary”)
2015	U.S. Patent Application Publication No. 2016/0343414 A1 (“Lee V”)
2016	U.S. Patent Application Publication No. 2016/0099060 A1 (“Yoo”)
2017	Rino Micheloni et al., <i>Inside NAND Flash Memories</i> (2010) (excerpts)
2018	Order Granting Motion to Consolidate, <i>Yangtze Memory Technologies Company, Ltd. v. Micron Technology, Inc.</i> , No. 3:23-cv-05792-RFL (N.D. Cal. Aug. 21, 2024), ECF No. 106
2019	Jan M. Rabaey et al., <i>Digital Integrated Circuits: A Design Perspective</i> (2003) (excerpts)

Ex.	Description
2020	<i>3D Flash Memories</i> (Rino Micheloni ed. 2016)
2021	Transcript of the deposition of David Kuan-Yu Liu, Ph.D., taken October 16, 2025 (“Liu-Dep1”)
2022	Declaration of David Kuan-Yu Liu, Ph.D., <i>Micron Technology, Inc. v. Yangtze Memory Technologies Company, Ltd.</i> , IPR2024-00792 (PTAB Apr. 29, 2024), Ex. 1003
2023	Reply Declaration of David Kuan-Yu Liu, Ph.D., <i>Micron Technology, Inc. v. Yangtze Memory Technologies Company, Ltd.</i> , IPR2024-00792 (PTAB Apr. 25, 2025), Ex. 1027
2024	Myounggon Kang & Yoon Kim, <i>Natural Local Self-Boosting Effect in 3D NAND Flash Memory</i> , IEEE (2017) (“Kang”)
2025	Yoon Kim & Myounggon Kang, <i>Down-Coupling Phenomenon of Floating Channel in 3D NAND Flash Memory</i> , 37 IEEE Electron Device Letters 1566 (Dec. 2016)
2026	Sangwoo Han et al., <i>Investigation of Inhibited Channel Potential of 3D NAND Flash Memory According to Word-Line Location</i> , 9 Electronics 268 (Feb. 5, 2020)
2027	Youngseok Jeong, <i>Hot Carrier Injection Phenomenon due to Excessive Natural Local Self-Boosting Effect in 3D NAND Flash Memory</i> , Extended Abstracts 2019 Int’l Conf. on Solid State Devices & Materials 685 (2019) (“Jeong”)
2028	Declaration of Dr. Sunil P. Khatri, Ph.D. in Support of Patent Owner’s Response (“Khatri2”)
2029	Declaration of Richard A. Lowry in Response to Petitioner’s Objections to Evidence, with Appendices A-J [<i>served, not filed</i>]
2030	Transcript of the Deposition of David Kuan-Yu Liu, Ph.D., taken March 17, 2026 (“Liu-Dep2”)

Ex.	Description
2031	Patent Owner's Demonstratives

Respectfully submitted,

Dated: April 21, 2026

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 21st day of April, 2026, a true and correct copy of the foregoing **Patent Owner's Updated Exhibit List and Exhibit 2031** were served by electronic mail on Petitioner's lead and backup counsel at the following email addresses:

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