

IN THE 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. IPR2025-00190
U.S. Patent No. 11,568,941
Issue Date: January 31, 2023

Title: MEMORY INCLUDING A PLURALITY OF PORTIONS AND USED
FOR REDUCING PROGRAM DISTURBANCE AND PROGRAM METHOD
THEREOF

PETITIONER'S UPDATED EXHIBIT LIST

LISTING OF EXHIBITS

Exhibit	Description
1001	U.S. Patent No. 11,568,941 to Song et al. (the “’941 patent”)
1002	File History for U.S. Patent No. 11,568,941
1003	File History for U.S. Patent No. 11,195,590
1004	Declaration of David Kuan-Yu Liu, Ph.D. (“Liu”)
1005	U.S. Patent Publication No. 2008/0279008 (“Dong”)
1006	U.S. Patent Publication No. 2008/0159003 (“Dong II”)
1007	U.S. Patent Publication No. 2006/0250850 (“Lee”)
1008	U.S. Patent Publication No. 2018/0190498 (“Lee II”)
1009	Aritome, “NAND Flash Memory Technologies” (2016)
1010	Micheloni et al., “Inside Solid State Drives (SSDs)” (2nd Ed. 2018)
1011	Silvagni, “3D NAND Flash Based on Planar Cells,” Computers 2017
1012	U.S. Patent Publication No. 2018/0012667 (“Costa”)
1013	U.S. Patent Publication No. 2019/0102104 (“Righetti”)
1014	U.S. Patent Publication No. 2012/0003800 (“Lee III”)
1015	U.S. Patent No. 6,859,397 (“Lutze”)
1016	U.S. Patent No. 10,269,570 (“Lee IV”)
1017	U.S. Patent Publication No. 2012/0163096 (“Futatsuyama”)
1018	U.S. Patent Publication No. 2019/0214405 (“Shirai”)
1019	U.S. Patent No. 10,438,671 (“Chen”)
1020	U.S. Patent No. 9,589,978 (“Yip”)

Exhibit	Description
1021	<i>Curriculum Vitae</i> of David Kuan-Yu Liu, Ph.D.
1022	Yeh et al., “Z-Interference and Z-Disturbance in Vertical Gate- Type 3-D NAND,” IEEE Transactions on Electron Devices, Vol. 63, No. 3, March 2016, pp. 1047-1053
1023	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
1024	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
1025	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
1026	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
1027	Declaration of Jared Bobrow in Support of Petitioner’s Motion for Admission <i>Pro Hac Vice</i>
1028	Press Release, Micron, Micron and Intel Unveil New 3D NAND Flash Memory (Mar. 26, 2015) (“Micron ‘3D NAND Flash Memory’ Press Release”)
1029	Press Release, Micron, <i>Micron and WekaIO Win Best of Show Award at the Flash Memory Summit 2019</i> (Aug. 29, 2019) (“Micron ‘Best of Show Award’”)
1030	Micron Technology, Inc., Annual Report (Form 10-K) (Oct. 4, 2024)

Exhibit	Description
1031	Ministry of Industry and Information Technology, <i>The Ministry of Industry and Information Technology Officially Announced the “National Integrated Circuit Industry Development Promotion Outline”</i> (Jun. 26, 2014) (https://www.cac.gov.cn/2014-06/26/c_1111325916.htm) (“National IC Development Promotion Outline”)
1032	Certified English Translation of Ex. 1031 (National IC Development Promotion Outline)
1033	Karen M. Sutter et al., Cong. Rsch. Serv., R47558, <i>Semiconductors and the CHIPS Act: The Global Context</i> (2023)
1034	Alex He, <i>Case Study: From Paper Tiger to Real Tiger? The Development of China’s Semiconductor Industry</i> , CENTRE FOR INT’L GOVERNANCE INNOVATION 14 (2021)
1035	State-Owned Assets Supervision and Administration Commission of the State Council (SASAC), <i>Definition of “State-Owned Enterprise”</i> (July 4, 2019) (https://www.sasac.gov.cn/n2588040/n2590387/n9854212/c11647665/content.html) (“SASAC Definition”)
1036	Certified English Translation of Ex. 1035 (SASAC Definition)
1037	China’s State Council, <i>Notice of the State Council on Issuing “Made in China 2025”</i> (May 19, 2015) (https://www.gov.cn/zhengce/content/2015-05/19/content_9784.htm) (“Made in China 2025”)
1038	Certified English Translation of Ex. 1037 (Made in China 2025)
1039	Karen M. Sutter, Cong. Rsch. Serv., R46767, <i>China’s New Semiconductor Policies: Issues for Congress</i> (2021)
1040	Liu Yuanchun et al., <i>Accelerating the Realization of High-Level Scientific and Technological Self-Reliance</i> , PEOPLE (July 15, 2024) (http://paper.people.com.cn/zgjzk/html/2024-07/15/nw.zgjzk_20240715_1-05.htm) (“People’s Paper Article”)

Exhibit	Description
1041	Certified English Translation of Ex. 1040 (<i>People's Paper</i> Article)
1042	YMTC, <i>Yangtze Memory Technologies Co. Ltd. Officially Established</i> (Aug. 1, 2016) (https://www.ymtc.com/cn/news/28.html) ("YMTC Press Release")
1043	Certified English Translation of Ex. 1042 (YMTC Press Release)
1044	Testimony of Stephen Ezell (VP, Global Innovation Policy – Information Technology & Innovation Foundation) Before the U.S.-China Economic and Security Review Commission (Apr. 14, 2022)
1045	Yahoo! Finance, South China Morning Post, Tech War: China's Top Memory Chip Maker YMTC Gets US\$7 Billion From State-Backed Investors (Mar. 2, 2023) ("Yahoo! Article")
1046	Baidu, <i>Yangtze Memory Increases Capital and Expands Capacity to RMB 100 Billion, Big Fund Phase II Forms a Partnership with Local Hubei State-owned Assets</i> (Mar. 2, 2023) (https://baijiahao.baidu.com/s?id=1759256650733024656&wfr=spider&for=pc) ("Baidu Article")
1047	Certified English Translation of Ex. 1046 (<i>Baidu</i> Article)
1048	YMTC's Rule 7.1 Corporate Disclosure Statement, <i>Yangtze Memory Technologies Company, Ltd. v. Micron Technology, Inc.</i> , Case No. 5:23-cv-05792-VKD (N.D. Cal. Nov. 9, 2023)
1049	Lianhe Credit Rating Co., Ltd., Wuhan Optics Valley Financial Holding Group Co., Ltd., 2024 Tracking Rating Report (Jun. 28, 2024) ("2024 Tracking Rating Report")
1050	Certified English Translation of Ex. 1049 (2024 Tracking Rating Report)

Exhibit	Description
1051	State-Owned Assets Supervision and Administration Commission of the State Council (SASAC), <i>Focusing on Key Points and Making Breakthroughs in Innovation, Hubei Solidly Promotes the Deepening and Improvement Actions to Go Deeper and More Concrete</i> (Mar. 25, 2024) (www.sasac.gov.cn/n4470048/n29955503/n30329277/n30329358/c30380577/content.html) (“Statement of China’s State Council”)
1052	Certified English Translation of Ex. 1051 (Statement of China’s State Council)
1053	Sina Finance, <i>Yangtze Memory’s “Double 11 Performance” Surpassed Samsung’s for the First Time</i> (Nov. 12, 2024) (https://finance.sina.com.cn/roll/2024-11-12/doc-incvupap6483110.shtml) (“Sina Finance Article”)
1054	Certified English Translation of Ex. 1053 (<i>Sina Finance</i> Article)
1055	Southeast University, <i>Yangtze Memory Technologies Co., Ltd. 2024 Campus Recruitment</i> (Mar. 13, 2024) (https://seu.91job.org.cn/substation/lectureDetail?xjhid=1000000000301932&xxdm=10286) (“Southeast Univ., YMTC 2024 Campus Recruitment”)
1056	Certified English Translation of Ex. 1055 (Southeast Univ., YMTC 2024 Campus Recruitment)
1057	Wuhan University of Science and Technology, <i>Yangtze Memory Technologies Co., Ltd. 2020 Campus Recruitment Introduction</i> (Sept. 10, 2019) (https://wust.91wllm.cn/teachin/view/id/97310) (“Wuhan Univ. of Sci. and Tech., YMTC 2020 Campus Recruitment Introduction”)
1058	Certified English Translation of Ex. 1057 (Wuhan Univ. of Sci. and Tech., YMTC 2020 Campus Recruitment Introduction)
1059	China University of Petroleum, <i>Yangtze Memory 2025 Campus Recruitment</i> (Feb. 20, 2025) (https://career.cup.edu.cn/job/view/id/618140) (“China Univ. Of Petroleum, YMTC 2025 Campus Recruitment”)

Exhibit	Description
1060	Certified English Translation of Ex. 1059 (China Univ. Of Petroleum, YMTC 2025 Campus Recruitment)
1061	Yoko Kubota et al., <i>U.S. Chip Equipment Suppliers Suspend Business Activities at Yangtze Memory</i> , WALL STREET JOURNAL CHINA (Oct. 13, 2022) (https://cn.wsj.com/articles/美国供应商暂停在中国长江存储科技的业务活动-11665617406) (“ <i>WSJ China Article</i> ”)
1062	Certified English Translation of Ex. 1061 (<i>WSJ China Article</i>)
1063	Letter from Michael T. McCaul, Member of Congress, and Bill Hagerty, U.S. Senator, to the Honorable Gina Raimondo, U.S. Commerce Secretary (July 12, 2021)
1064	Demetri Sevastopulo, <i>Bipartisan Group Urges US Blacklist for “Beijing-Directed” Chipmaker</i> , FINANCIAL TIMES (Sept. 20, 2022) (https://www.ft.com/content/173eb5b7-c211-4fa8-af8e-93382ed12836) (“ <i>Financial Times Article</i> ”)
1065	U.S. Senator Charles E. Schumer, <i>With Chinese Chip Companies Threatening National Security And Jobs, Schumer Announces President Has Heeded His Call And Will Add YMTC - One Of China’s Leading Chip Makers - To A Trade Blacklist; Administration Action Will Strengthen National Security And Protect The Domestic Chip Industry</i> (Dec. 16, 2022) (“ <i>Schumer Statement</i> ”)
1066	U.S. Department of Defense, <i>DOD Releases List of People’s Republic of China (PRC) Military Companies in Accordance with Section 1260H of the National Defense Authorization Act for Fiscal Year 2021</i> (Jan. 31, 2024) (https://www.defense.gov/News/Releases/Release/article/3661985/dod-releases-list-of-peoples-republic-of-china-prc-military-companies-in-accord/)

Exhibit	Description
1067	U.S. Department of Defense, <i>Entities Identified as Chinese Military Companies Operating in the United States in accordance with Section 1260H of the William M. (“Mac”) Thornberry National Defense Authorization Act for Fiscal Year 2021 (Public Law 116-283)</i> (https://media.defense.gov/2024/Jan/31/2003384819/-1/-1/0/1260H-LIST.PDF)
1068	<i>Oversight of the USPTO: Hearing Before the Subcomm. On Intellectual Property</i> , 118th Cong. (2023) (Testimony of Katherine Vidal, Undersecretary of Commerce for IP and Director of USPTO)
1069	China’s State Council, <i>Notice of the State Council on Issuing Policies to Promote the High-quality Development of the Integrated Circuit Industry and Software Industry in the New Era</i> (Aug. 4, 2020) (https://www.gov.cn/zhengce/content/2020-08/04/content_5532370.htm) (“State Council Notice on Policies to Promote Development of IC”)
1070	Certified English Translation of Ex. 1071 (State Council Notice on Policies to Promote Development of IC)
1071	Declaration of Karen Lee, Translator (Mar. 10, 2025)
1072	Declaration of Fei-Xue Qian, Translator (Mar. 10, 2025)
1073	Order Granting Motion to Stay Case Pending <i>Inter Partes</i> Review, <i>Yangtze Memory Techs. Co., Ltd. v. Micron Tech., Inc. et al.</i> , Case No. 3:23-cv-05792-RFL, Docket No. 243 (N.D. Cal. Mar. 14, 2025)
1074	Plaintiff and Counterclaim Defendant Yangtze Memory Technologies Company, Ltd.’s Disclosure of YMTC I Asserted Claims and Infringement Contentions, <i>Yangtze Memory Techs. Co., Ltd. v. Micron Tech., Inc. et al.</i> , Case No. 3:23-cv-05792-RFL (N.D. Cal. May 6, 2024)
1075	Tanaka et al., <i>Bit Cost Scalable Technology with Punch and Plug Process for Ultra High Density Flash Memory</i> , VLSI Symposium Technical Digest, 2007, pp. 14-15

Exhibit	Description
1076	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. et al.</i> , Case No. 3:23-cv-05792-RFL (N.D. Cal. Jan. 31, 2025)
1077	Amended Claims of ZL 202080000267.4 (CN111344792)
1078	Declaration of Gordon MacPherson (SERVICE ONLY)
1079	Entry on the Wiley Online Library for Aritome, "NAND Flash Memory Technologies," https://onlinelibrary.wiley.com/doi/book/10.1002/9781119132639 (SERVICE ONLY)
1080	U.S. Copyright Registration for Aritome, "NAND Flash Memory Technologies" (SERVICE ONLY)
1081	Library of Congress Marc Record for Aritome, "NAND Flash Memory Technologies," https://search.catalog.loc.gov/instances/f731a7af-7a75-5ccf-9aca-32cf0b662658?option=lccn&query=2016462666 (SERVICE ONLY)
1082	U.S. Patent No. 7,672,165 ("Pham")
1083	U.S. Patent No. 9,230,658 ("Han")
1084	U.S. Patent No. 9,530,492 ("Lee 492")
1085	U.S. Patent No. 9,613,704 ("Lee 704")
1086	U.S. Patent Publication No. 2021/0158880 ("Zhao")
1087	U.S. Patent Publication No. 2007/0252201 ("Kito")
1088	<i>Intentionally Omitted</i>
1089	Reply Declaration of David Kuan-Yu Liu, Ph.D. ("Liu_Reply")
1090	U.S. Patent No. 8,542,529
1091	U.S. Patent No. 10,762,973

Exhibit	Description
1092	U.S. Patent No. 11,373,716
1093	U.S. Patent No. 10,438,671
1094	Transcript of the January 27, 2026 deposition of Dr. Sunil Khatri
1095	U.S. Patent No. 11,581,322
1096	U.S. Patent No. 10,861,872
1097	U.S. Patent No 10,658,378
1098	U.S. Patent No 10,950,623
1099	U.S. Patent No 10,672,711
1100	District Court Declaration of Dr. Sunil P. Khatri, Ph.D., dated January 31, 2025
1101	<i>Novel Ultrahigh-Density Flash Memory With a Stacked-Surrounding Gate Transistor (S-SGT) Structured Cell</i> , Tetsuo Endoh et al., IEEE Transactions on Electron Devices, Vol. 50, No. 4, April 2003 (“Endoh1”)
1102	<i>Novel Ultra High Density Flash Memory with A Stacked-Surrounding Gate Transistor (S-SGT) Structured Cell</i> , Tetsuo Endoh et al., IEDM 01-33, 2001 (“Endoh2”)
1103	NAND Memory Market Tracker – Q2 2020, https://omdia.tech.informa.com/-/media/tech/omdia/legacy-ih/asset-families/nand-memory-market-tracker-q2-2020.pdf
1104	https://news.samsung.com/global/samsung-electronics-takes-3d-memory-to-new-heights-with-sixth-generation-v-nand-ssds-for-client
1105	https://news.skhynix.com/sk-hynix-starts-mass-producing-worlds-first-128-layer-4d-nand/
1106	https://blocksandfiles.com/2022/05/13/micron-flash-roadmap/

Exhibit	Description
1107	https://www.techpowerup.com/258862/yangtze-memory-begins-mass-production-of-64-layer-3d-nand-flash-memory
1108	https://investors.micron.com/news-releases/news-release-details/micron-and-intel-unveil-new-3d-nand-flash-memory
1109	https://news.samsung.com/global/samsung-starts-mass-producing-industrys-first-3d-vertical-nand-flash
1110	https://overclock3d.net/news/storage/western-digital-announces-its-bics5-112-layer-3d-nand-with-kioxia/
1111	Affidavit of Mina Ching regarding Exhibits 1103-1110 (SERVICE ONLY)
1112	Hearing Demonstratives

Respectfully submitted,

ORRICK, HERRINGTON & SUTCLIFFE LLP

Dated: April 21, 2026

/ Travis Jensen/

Travis Jensen, Reg. No. 60,087

1000 Marsh Road

Menlo Park, CA 94025-1015

T: (650) 614-7400

F: (650) 614-7401

Email: T61PTABDocket@orrick.com

Attorneys for Petitioner Micron Technology, Inc.

CERTIFICATE OF SERVICE

The undersigned hereby confirms that the foregoing paper was caused to be served on April 21, 2026 via electronic mail, upon the following attorneys of record for the Patent Owner

Inge A. Osman (inge.osman@lw.com)
Kevin Wheeler (kevin.wheeler@lw.com)
Charles H. Sanders (charles.sanders@lw.com)
Amit Makker (amit.makker@lw.com)
Richard A. Lowry (richard.lowry@lw.com)
B. Thomas Watson (thomas.watson@lw.com)
Alex Grabowski (alex.grabowski@lw.com)
Benjamin Smith (ben.smith@lw.com)
YMTCMICRONIPR.LWTEAM@lw.com
LATHAM & WATKINS LLP

/Karen Johnson/

Karen Johnson