

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

Entered: December 9, 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 IPR2025-00191
Patent 11,581,322

**PATENT OWNER'S UNOPPOSED MOTION FOR
PRO HAC VICE ADMISSION OF ROBERT B. DUNTEMAN
UNDER 37 C.F.R. § 42.10(c)**

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	Disclaimer in Patent Under 37 C.F.R. § 1.321(a)
2007	Declaration of Dr. Stephen A. Campbell ("Campbell")
2008	<i>Curriculum Vitae</i> of Dr. Stephen A. Campbell
2009	<i>Inside Solid State Drives (SSDs)</i> (Rino Micheloni et al. eds., 2d ed. 2018)

Ex.	Description
2010-2017	RESERVED
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	RESERVED
2020	U.S. Patent Application Publication No. 2007/0358593 A1, Published Dec. 14, 2017
2021	Declaration of Stephen Campbell in Support of Patent Owner's Response ("Campbell2")
2022	Transcript of the Deposition of Jack C. Lee, Ph.D., taken July 30, 2025, <i>Micron Tech., Inc. v. Yangtze Memory Techs. Co.</i> , IPR2025-00034 ("Lee '254 Dep.")
2023	Harmeet Singh, <i>Overcoming Challenges in 3D NAND Volume Manufacturing</i> , 60 Solid State Technology 18 (July 2017)
2024	Thermo Fisher Scientific, <i>White Paper: The Challenge of Measuring Buried Critical Dimensions in High-Aspect-Ratio Structures: How Busy Fab Process Owners Can Reduce Time-to-Data in 3D NAND Metrology</i> , https://assets.thermofisher.com/TFS-Assets/MSD/Reference-Materials/helios-5-pxl-3d-nand-whitepaper-wp0025.pdf (last visited Aug. 5, 2025)
2025	Mark Lapedus, <i>What's Next for NAND?: Vendors Pin Hopes on 3D Memory, Raising Specter of 2D NAND Shortages; Other Memory Types Add to Uncertainty</i> , Semiconductor Eng'g (May 19, 2016), https://web.archive.org/web/20161127122539/https://semiengineering.com/whats-next-for-nand/ (last visited Aug. 15, 2025)

Ex.	Description
2026	Mark Lapedus, <i>3D NAND Flash Wars Begin: Market Overcrowding, More Efficient Manufacturing, and Growing List of Scaling Issues Create a Challenging Competitive Landscape</i> , Semiconductor Eng'g (Aug. 20, 2018), https://web.archive.org/web/20180822030129/https://semiengineering.com/3d-nand-flash-wars-begin/ (last visited Aug. 15, 2025)
2027	Mark Shirey & Janay Camp, <i>Digging Deep Into High Aspect Ratio Process Control for Memory Technology</i> , Semiconductor Eng'g (Oct. 18, 2018), https://web.archive.org/web/20250621011306/https://semiengineering.com/digging-deep-into-high-aspect-ratio-process-control-for-memory-technology/ (last visited Aug. 15, 2025)
2028	Mark Lapedus, <i>3D NAND Metrology Challenges Growing: Rising Costs and Gaps in Equipment Emerge as Technology Scales; New Tools Under Development</i> , Semiconductor Eng'g (Apr. 9, 2019), https://semiengineering.com/3d-nand-metrology-challenges-growing/
2029	Mark Lapedus, <i>3D NAND's Vertical Scaling Race: More Competition, Business Uncertainty, and Much More Difficult Manufacturing Processes</i> , Semiconductor Eng'g (Dec. 17, 2020), https://semiengineering.com/3d-nands-vertical-scaling-race/
2030	Yongsik Yu, <i>Tech Brief: Memory "Grows Up" with 3D NAND</i> , Lam Rsch. Newsroom (Apr. 11, 2016), https://newsroom.lamresearch.com/Tech-Brief-Memory-Grows-Up-with-3D-NAND (last visited Aug. 5, 2025)
2031	Mark Lapedus, <i>NAND Market Hits Speed Bump: Transition from Planar to 3D NAND is Harder and More Time-Consuming Than Expected</i> , Semiconductor Eng'g (June 21, 2017), https://web.archive.org/web/20180625071314/https://semiengineering.com/nand-market-hits-speed-bump/ (last visited Aug. 15, 2025)

Ex.	Description
2032	Mark Lapedus, <i>3D NAND Race Faces Huge Tech and Cost Challenges: Shakeout Looms as Vendors Struggle to Find Ways to Add More Layers and Increase Density</i> , Semiconductor Eng'g (May 23, 2019), https://web.archive.org/web/20190619034609/https://semiengineering.com/3d-nand-race-faces-huge-tech-and-cost-challenges/ (last visited Aug. 15, 2025)
2033	Mark Lapedus, <i>How to Make 3D NAND: Foundries Progress With Complex Combination of High-Aspect Ratio Etch, Metal Deposition and String Stacking</i> , Semiconductor Eng'g (May 23, 2016), https://semiengineering.com/how-to-make-3d-nand/ (last visited Aug. 15, 2025)
2034	Timothy Yang, <i>Creating Higher Density 3D NAND Structures: Identify the Manufacturing Issues Associated With Increased 3D NAND Density to Make the Best Tradeoffs and Avoid Structural Collapse</i> , Semiconductor Eng'g (Feb. 21, 2019), https://semiengineering.com/creating-higher-density-3d-nand-structures/ (last visited Aug. 15, 2025)
2035	Seong Jae Yoo et al., <i>Highly Selective Etching of SiN_x Over SiO₂ Using CIF₃/Cl₂ Remote Plasma</i> , 34 Nanotechnology 465302 (2023)
2036	Entegris, <i>White Paper: Considerations for Improving 3D NAND Performance, Reliability, and Yield</i> , https://www.entegris.com/content/dam/web/resources/white-papers/whitepaper-improving-3d-nand-performance-8443.pdf (last visited Aug. 5, 2025)
2037	RESERVED
2038	Transcript of the Deposition of Jack C. Lee, Ph.D., taken October 23, 2025, <i>Micron Tech. Inc. v. Yangtze Memory Techs. Co.</i> , IPR2025-00191
2039	Declaration of Robert B. Duntelman In Support of Patent Owner's Unopposed Motion for <i>Pro Hac Vice</i> Admission Under 37 C.F.R. § 42.10(c)

I. RELIEF REQUESTED

Under 37 C.F.R. § 42.10(c) and the Notice of Filing Date Accorded to Petition and Time for Filing Patent Owner Preliminary Response (Paper No. 6), Patent Owner Yangtze Memory Technologies Company, Ltd. ("Patent Owner") respectfully requests the *pro hac vice* admission of attorney Robert B. Dunteman, Esq., in this proceeding. Patent Owner has conferred with counsel for Micron Technology, Inc. ("Petitioner"), and Petitioner does not oppose this motion.

II. LEGAL STANDARD

Under 37 C.F.R. § 42.10(c):

The Board may recognize counsel *pro hac vice* during a proceeding upon a showing of good cause, subject to the condition that lead counsel be a registered practitioner and to any other conditions as the Board may impose. For example, where the lead counsel is a registered practitioner, a motion to appear *pro hac vice* by counsel who is not a registered practitioner may be granted upon showing that counsel is an experienced litigating attorney and has an established familiarity with the subject matter at issue in the proceeding.

The Notice of Filing Date Accorded to Petition and Time for Filing Patent Owner Preliminary Response (Paper No. 6) further instructs that a motion for *pro hac vice* must:

- a. Contain a statement of facts showing there is good cause for the Board to recognize counsel *pro hac vice* during the proceeding; and
- b. Be accompanied by an affidavit or declaration in which the individual seeking *pro hac vice* recognition attests to the following:
 - i. Membership in good standing of the Bar of at least one State or the District of Columbia;
 - ii. No suspensions or disbarments from practice before any court or administrative body;
 - iii. No application for admission to practice before any court or administrative body ever denied;
 - iv. No sanctions or contempt citations imposed by any court or administrative body;
 - v. The individual seeking to appear has read and will comply with the Office Patent Trial Practice Guide and Board's Rules of Practice for Trials set forth in 37 C.F.R. part 42;
 - vi. The individual will be subject to the USPTO Rules of Professional Conduct set forth in 37 C.F.R. §§ 11.101 *et seq.* and disciplinary jurisdiction under 37 C.F.R. § 11.19(a);
 - vii. All other proceedings before the Office for which the individual has applied to appear *pro hac vice* in the last three years; and

viii. Familiarity with the subject matter at issue in the proceeding.

Paper No. 6 at 3-4 (footnote omitted). As set forth below, and in the accompanying Declaration of Robert B. Dunteman ("Dunteman Decl.," Ex. 2039), each of these requirements is satisfied here.

III. STATEMENT OF FACTS SHOWING GOOD CAUSE FOR THE BOARD TO RECOGNIZE ROBERT B. DUNTEMAN ESQ. *PRO HAC VICE* IN THIS PROCEEDING

Mr. Dunteman is a member in good standing of the District of Columbia (Bar No. 90002747), the Minnesota State Bar (Bar No. 0401794), and the Illinois State Bar (Bar No. 6350772), and admitted to practice before the United States Court of Appeals for the Federal Circuit. Dunteman Decl. ¶ 2. Mr. Dunteman has never been suspended or disbarred from practice before any court or administrative body. *Id.* ¶ 3. No application of Mr. Dunteman for admission to practice before any court or administrative body has ever been denied. *Id.* Nor has any court or administrative body imposed sanctions or contempt citations against Mr. Dunteman. *Id.* Mr. Dunteman has read, fully understands, and will comply with the Office Patent Trial Practice Guide and the Board's Rules of Practice for Trials set forth in part 42 of title 37 of the Code of Federal Regulations. *Id.* ¶ 4. Mr. Dunteman acknowledges and agrees that he will be subject to the USPTO Rules of Professional Conduct set forth in 37 C.F.R. §§ 11.101 *et seq.* and disciplinary jurisdiction under 37 C.F.R. § 11.19(a). *Id.*

Patent Owner's lead counsel in this proceeding, Inge A. Osman, is a registered practitioner (Reg. No. 74,480). Moreover, as set forth below (and in his accompanying declaration), Mr. Dunteman is both an experienced and technically-trained litigation attorney with an established familiarity with the subject matter at issue in this proceeding.

Mr. Dunteman received a Bachelor of Science degree in Mechanical Engineering from Iowa State University in 2016. Dunteman Decl. ¶ 5. Mr. Dunteman earned a law degree from the University of Chicago Law School in 2020. *Id.* Mr. Dunteman joined Latham & Watkins LLP ("Latham") as an associate in 2024. *See id.* ¶ 6.

Mr. Dunteman is currently a member of Latham's intellectual property group, with a focus on patent litigation. *Id.* Mr. Dunteman has practiced in this group for nearly two years. *Id.*

Mr. Dunteman also has an established familiarity with the subject matter at issue in this proceeding. Mr. Dunteman has been actively involved in Patent Owner's development of its validity positions regarding the claims of the '322 patent at issue here. *Id.* ¶¶ 7-8. Mr. Dunteman has been actively involved in analyzing and assisting with responding to the Petition for *Inter Partes* Review submitted in this proceeding. *Id.* ¶ 9.

He is concurrently applying to appear *pro hac vice* in the following

proceedings before the USPTO: Case Nos. IPR2025-00117 and IPR2025-00228. *Id.*

¶ 10.

In view of Mr. Dunteman's extensive knowledge of the subject matter at issue in this proceeding, Patent Owner has a substantial need for Mr. Dunteman's *pro hac vice* admission and his involvement in the continued prosecution of this proceeding.

IV. CONCLUSION

For the foregoing reasons, Patent Owner respectfully requests that Mr. Dunteman be admitted *pro hac vice* in this proceeding.

Respectfully submitted,

Dated: December 9, 2025

By: / Inge A. Osman /

Inge A. Osman (Reg. No. 74,480)
inge.osman@lw.com
Latham & Watkins LLP
555 Eleventh Street, NW, Ste. 1000
Washington, DC 20004-1304
Tel.: 202.637.2200
Fax: 202.637.2201

*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 9th day of December, 2025, a true and correct copy of the foregoing **Patent Owner's Unopposed Motion for *Pro Hac Vice* Admission of Robert B. Dunteman Under 37 C.F.R. § 42.10(c) and Exhibit 2039** were served by electronic mail on Petitioner's lead and backup counsel at the following email addresses:

Jeremy Jason Lang
Jared Bobrow
Orrick, Herrington & Sutcliffe LLP
1000 Marsh Road
Menlo Park, CA 94025-1015
T: 650-614-7400
F: 650-614-7401
jlang@orrick.com
jbobrow@orrick.com
PTABDocketJJL2@orrick.com
PTABDocketT6J1@orrick.com
PTABDocketJ3B3@orrick.com
MICRON-YMTC_OHS@orrick.com

Thomas James
Orrick, Herrington & Sutcliffe LLP
353 N Clark Street, Suite 3600
Chicago, IL 60654
T: 312-924-9800
F: 312-924-9899
tjames@orrick.com

By: / Inge A. Osman /

Inge A. Osman (Reg. No. 74,480)
inge.osman@lw.com

Latham & Watkins LLP
555 Eleventh Street, NW, Ste. 1000
Washington, DC 20004-1304
Tel.: 202.637.2200
Fax: 202.637.2201

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