

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.: IPR2025-00191
U.S. Patent No. 11,581,322

PETITIONER'S UPDATED EXHIBIT LIST

LISTING OF EXHIBITS

Exhibit.	Description
1001	U.S. Patent No. 11,581,322 to Guo et al. (“322 patent”)
1002	File History of U.S. Patent No. 11,581,322 (“322 FH”)
1003	Declaration of Dr. Jack C. Lee (“Lee”)
1004	<i>Curriculum Vitae</i> of Dr. Jack C. Lee
1005	U.S. Patent No. 9,837,431 to Nishikawa et al. (“Nishikawa”)
1006	U.S. Patent No. 9,853,046 to Lu et al. (“Lu”)
1007	U.S. Patent No. 10,658,378 to Tao et al.
1008	U.S. Patent Publication No. 2019/0229125A1 to Zhou et al.
1009	U.S. Patent No. 10,777,501 to Nakajima et al. (“Nakajima”)
1010	Micheloni, “3D Flash Memories” (2016)
1011	U.S. Patent Publication No. 2017/0179026 A1 to Toyama et al.
1012	U.S. Patent No. 10,354,980 to Mushiga et al. (“Mushiga”)
1013	PCT Publication No. WO 2019/042103A1 to Dai et al.
1014	U.S. Patent No.10,679,721 to Kim et al.
1015	Aritome, “NAND Flash Memory Technologies” (“Aritome”)
1016	File History for U.S. Patent Application No. 16/745,342
1017	U.S. Patent Publication No. 2012/0280304A1 to Lee et al. (“Lee304”)
1018	U.S. Patent Publication No. 2017/0125430A1 to Nishikawa et al. (“Nishikawa430”)
1019	U.S. Patent Publication No. 2015/0348987A1 to Lee et al. (“Lee987”)

Exhibit.	Description
1020	U.S. Patent Publication No. 2018/0301374A1 to Masamori et al. (“Masamori”)
1021	U.S. Patent No. 8,107,292 to Maejima
1022	U.S. Patent No. 10,347,654 to Iwai et al. (“Iwai”)
1023	U.S. Patent No. 10,559,583 to Park et al.
1024	U.S. Patent No. 5,945,717 to Chevallier
1025	U.S. Patent No. 10,347,487 to Lee et al.
1026	Ronse, “Optical lithography—a historical perspective,” C. R. Physique 7 (2006) (“Ronse”)
1027	U.S. Patent No. 10,290,643 to Kai et al. (“Kai”)
1028	U.S. Patent No. 9,859,297 to Park et al. (“Park297”)
1029	U.S. Patent Publication No. 2018/0308559 to Kim et al. (“Kim559”)
1030	U.S. Patent No. 8,945,996 to Tang et al.
1031	U.S. Patent No. 10,115,632 to Masamori et al. (“Masamori632”)
1032	U.S. Patent No. 10,879,254 to Guo et al.
1033	U.S. Patent No. 9,793,139 to Sharangpani et al.
1034	Wolf, “Silicon Processing for the VLSI Era, Volume 1-Process Technology,” Lattice Press (1986) (“Wolf Vol. 1”)
1035	Wolf, “Silicon Processing for the VLSI Era, Volume 2-Process Integration,” Lattice Press (1990) (“Wolf Vol. 2”)
1036	U.S. Patent Publ. No. 2019/0081061 to Tessariol et al. (“Tessariol”)
1037	U.S. Patent No. 10,304,852 to Cui et al. (“Cui”)

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1038	Excerpt from YMTC’s Exemplary Infringement Claim Chart for U.S. Patent No. 10,879,254 (Ex. B-1 to Disclosure of YMTC II Asserted Claims and Infringement Contentions, dated October 2, 2024) (“Ex. B-1, YMTC’s Contentions”) [PROTECTIVE ORDER MATERIAL – FILED UNDER SEAL]
1039	U.S. Patent No. 11,075,084 to Shen et al.
1040	U.S. Patent No. 10,504,596 to Goda et al.
1041	U.S. Patent No. 10,381,369 to Kim et al. (“Kim369”)
1042	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
1043	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
1044	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
1045	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
1046	U.S. Patent No. 9,935,123 to Nishikawa (“Nishikawa2”)
1047	Printout, 11/26/2024, Britannica (https://www.britannica.com/science/geometry) (ellipse)
1048	Declaration of Jared Bobrow in Support of Petitioner’s Motion for Admission <i>Pro Hac Vice</i>
1049	<i>Intentionally Omitted</i>
1050	<i>Intentionally Omitted</i>

Exhibit.	Description
1051	Press Release, Micron, Micron and Intel Unveil New 3D NAND Flash Memory (Mar. 26, 2015) (“Micron ‘3D NAND Flash Memory’ Press Release”)
1052	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’”)
1053	Micron Technology, Inc., Annual Report (Form 10-K) (Oct. 4, 2024)
1054	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”)
1055	Certified English Translation of EX1054 (National IC Development Promotion Outline)
1056	Karen M. Sutter et al., Cong. Rsch. Serv., R47558, <i>Semiconductors and the CHIPS Act: The Global Context</i> (2023)
1057	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)
1058	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”)
1059	Certified English Translation of EX1058 (SASAC Definition)
1060	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”)
1061	Certified English Translation of EX1060 (Made in China 2025)
1062	Karen M. Sutter, Cong. Rsch. Serv., R46767, <i>China’s New Semiconductor Policies: Issues for Congress</i> (2021)

Exhibit.	Description
1063	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) (“ <i>People’s Paper Article</i> ”)
1064	Certified English Translation of EX1063 (<i>People’s Paper Article</i>)
1065	YMTC, <i>Yangtze Memory Technologies Co. Ltd. Officially Established</i> (Aug. 1, 2016) (https://www.ymtc.com/cn/news/28.html) (“YMTC Press Release”)
1066	Certified English Translation of EX1065 (YMTC Press Release)
1067	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)
1068	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) (“ <i>Yahoo! Article</i> ”)
1069	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) (“ <i>Baidu Article</i> ”)
1070	Certified English Translation of EX1069 (<i>Baidu Article</i>)
1071	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)
1072	Lianhe Credit Rating Co., Ltd., Wuhan Optics Valley Financial Holding Group Co., Ltd., 2024 Tracking Rating Report (Jun. 28, 2024) (“ <i>2024 Tracking Rating Report</i> ”)
1073	Certified English Translation of EX1072 (2024 Tracking Rating Report)

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1074	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”)
1075	Certified English Translation of EX1074 (Statement of China’s State Council)
1076	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”)
1077	Certified English Translation of EX1076 (<i>Sina Finance</i> Article)
1078	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”)
1079	Certified English Translation of EX1078 (Southeast Univ., YMTC 2024 Campus Recruitment)
1080	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”)
1081	Certified English Translation of EX1080 (Wuhan Univ. of Sci. and Tech., YMTC 2020 Campus Recruitment Introduction)
1082	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”)
1083	Certified English Translation of EX1082 (China Univ. of Petroleum, YMTC 2025 Campus Recruitment)
1084	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) (“WSJ China Article”)

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1085	Certified English Translation of EX1084 (<i>WSJ China Article</i>)
1086	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)
1087	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> ”)
1088	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) (“Schumer Statement”)
1089	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/)
1090	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)
1091	<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)
1092	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”)

Exhibit.	Description
1093	Certified English Translation of EX1092 (State Council Notice on Policies to Promote Development of IC)
1094	Declaration of Karen Lee, Translator (Mar. 10, 2025)
1095	Declaration of Fei-Xue Qian, Translator (Mar. 10, 2025)
1096	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)
1097	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. 23-cv-05792-RFL (N.D. Cal. May 6, 2024)
1098	Declaration of Ingrid Hsieh-Yee, Ph.D. Regarding Micron EX1010 (Michelsoni), originally filed in Case No. IPR2025-0034 (SERVICE ONLY)
1099	Entry on the Wiley Online Library for Aritome, "NAND Flash Memory Technologies," https://onlinelibrary.wiley.com/doi/book/10.1002/9781119132639 (SERVICE ONLY)
1100	U.S. Copyright Registration for Aritome, "NAND Flash Memory Technologies" (SERVICE ONLY)
1101	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)
1102	Declaration of Jeremy Jason Lang regarding Ronse (EX1026) (SERVICE ONLY)
1103	US Copyright Registration for Wolf & Tauber Vol. 1 (1986) (SERVICE ONLY)
1104	US Copyright Registration for Wolf & Tauber Vol. 2 (1990) (SERVICE ONLY)
1105	Reply Declaration of Dr. Jack C. Lee ("Lee2")
1106	Transcript of the Deposition of Stephen Campbell, taken January 23, 2026, Micron Tech. Inc. v. Yangtze Memory Techs. Co., IPR2025-00191

Exhibit.	Description
1107	Additional excerpts from Wolf, “Silicon Processing for the VLSI Era, Volume 1-Process Technology,” Lattice Press (1986)
1108	U.S. Patent No. 11,043,507
1109	U.S. Patent Publication No. 2015/0029775A1
1110	U.S. Patent Publication No. 2019/0027434A1
1111	U.S. Patent No. 10,115,737 (“Iwai737”)
1112	U.S. Patent No. 9,449,987 (“Miyata”)
1113	U.S. Patent No. 9,929,174 (“Mizutani”)
1114	U.S. Patent Publication No. 2019/035942A1 (“Kwon”)
1115	U.S. Patent Publication No. 2018/0190540 (“Liu”)
1116	PCT Publication No. WO 2019/066829A1
1117	Declaration of Rachel J. Watters on Authentication of Publication - Wolf, “Silicon Processing for the VLSI Era, Volume 1-Process Technology,” Lattice Press (1986) (Exhibits 1034 & 1107) (SERVICE ONLY)
1118	Declaration of Rachel J. Watters on Authentication of Publication - Wolf, “Silicon Processing for the VLSI Era, Volume 2-Process Integration,” Lattice Press (1990) (SERVICE ONLY)
1119	Petitioner’s Hearing Demonstratives

Dated: April 20, 2026

Respectfully submitted,

/Jeremy Jason Lang/

Jeremy Jason Lang
Lead Counsel for Petitioner
Reg. No. 73,604
ORRICK, HERRINGTON &
SUTCLIFFE LLP
1000 Marsh Road
Menlo Park, CA 94025
Telephone: (650) 614-7400
Facsimile: (650) 614-7401
Email: PTABDocketJJL2@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 20, 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)
Adam Greenfield (adam.greenfield@lw.com)
Jacob Vannette (jake.vannette@lw.com)
YMTCMICRONIPR.LWTEAM@lw.com
LATHAM & WATKINS LLP

/Karen Johnson/

Karen Johnson