

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.: IPR2025-00228
U.S. Patent No. 11,101,276

**PETITIONER'S MOTION FOR ADMISSION *PRO HAC VICE* OF
JARED BOBROW PURSUANT TO 37 C.F.R. § 42.10**

LISTING OF EXHIBITS

Exhibit	Description
1001	U.S. Patent No. 11,101,276 to Zhu et al. (“the ’276 patent”)
1002	File History of U.S. Patent No. 11,101,276 (“the ’276 FH”)
1003	Declaration of Dr. Sanjay Banerjee (“Banerjee”)
1004	<i>Curriculum Vitae</i> of Dr. Sanjay Banerjee
1005	U.S. Patent Publication No. 2012/0070944A1 (“Kim”)
1006	U.S. Patent Publication No. 2019/0067306A1 (“Fang”)
1007	U.S. Patent Publication No. 2017/0062470A1 (“Han”)
1008	U.S. Patent Publication No. 2017/0294384A1 (“Chen”)
1009	U.S. Patent Publication No. 2018/0330985A1 (“Yu”)
1010	Aritome, “NAND Flash Memory Technologies” (2016)
1011	Silvagni, “3D NAND Flash Based on Planar Cells,” Computers 2017
1012	Michelsoni et al., “Inside Solid State Drives (SSDs)” (2nd Ed. 2018)
1013	U.S. Patent Publication No. 2017/0117222A1 to Kim et al.
1014	Chang and Sze, “ULSI Technology” (1996)
1015	Orlowski et al., <i>Si, SiGe, Ge, and III-V Semiconductor Nanomembranes and Nanowires Enabled by SiGe Epitaxy</i> , ECS Transactions Vo. 33, No. 6 (2010), 777-89
1016	U.S. Patent No. 9,728,547 (“Ohsaki”)
1017	U.S. Patent Publication No. 2017/0148677A1 (“Shin”)
1018	U.S. Patent No. 10,672,711 to Zhu et al. (“the ’711 patent”)

Exhibit	Description
1019	Excerpt from YMTC’s Exemplary Infringement Claim Chart for U.S. Patent No. 11,101,276 (Ex. H-1 to Disclosure of YMTC II Asserted Claims and Infringement Contentions, dated October 2, 2024) (“YMTC2 Infringement Contentions, Ex. H-1”) [PROTECTIVE ORDER MATERIAL – FILED UNDER SEAL]
1020	Korean Patent Publication No. KR10-2013-0015120 (“Lee”) with machine translation
1021	Wolf S., et al., “Silicon Processing for the VLSI Era, Volume 1 – Process Technology, Chapter 15, Multilevel Interconnects for ULSI” (2nd Ed. 2000)
1022	CN Patent Publication No. 107658309 A with certified translation (Priority application to the ’276 patent)
1023	Wang, et al., “Low DC-Bias Silicon Nitride Anisotropic Etching,” Journal of Vacuum Science & Technology B, Vol. 33, Issue 6 (Sept. 10, 2015)
1024	U.S. Patent Publication No. 2014/0284661A1 (“Williams”)
1025	Shamiryan D., et al., “Selective Removal of High-K Gate Dielectrics,” Chemical Engineering Communications (2009)
1026	Morel, et al., “Tungsten metal gate etching in Cl ₂ /O ₂ inductively coupled high density plasmas,” Journal of Vacuum Science and Technology B (Nov. 3, 2008)
1027	Kim, et al., “Dry Etching of High-k Dielectric Thin Films in HBr/Ar Plasma,” Journal of the Korean Physical Society, Vol. 54, No. 2, pp. 934-38 (February 2009)
1028	U.S. Patent No. 10,297,543 to Park et al.
1029	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

Exhibit	Description
1030	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
1031	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
1032	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
1033	Declaration of Jared Bobrow in Support of Petitioner’s Motion for Admission <i>Pro Hac Vice</i>

Pursuant to 37 C.F.R. § 42.10, Petitioner Micron Technology, Inc. (“Micron” or “Petitioner”) respectfully requests that the Board admit Jared Bobrow *pro hac vice* in this proceeding.

I. STATEMENT OF FACTS

Pursuant to 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 facts, supported by the accompanying Declaration of Jared Bobrow in Support of Petitioner’s Motion for Admission *Pro Hac Vice* (Ex. 1033, “Bobrow Declaration”), establish good cause to admit Mr. Bobrow *pro hac vice* in this proceeding.

Lead counsel Jeremy Jason Lang is a registered practitioner.

Jared Bobrow is an experienced litigation attorney. Mr. Bobrow has been a litigating attorney for more than 36 years. Bobrow Declaration ¶ 1. Mr. Bobrow has been litigating patent cases for over 34 of those years. *Id.* Mr. Bobrow is a member in good standing of the California State Bar, with no suspensions or disbarments from practice, nor any application for admission to practice denied, nor any sanctions or contempt citations, and is admitted to practice in the United States Court of Appeals for the Federal Circuit, United States Court of Appeals for the Ninth Circuit, United States Court of Appeals for the First Circuit; California State Supreme Court; the United States District Court for the Eastern District of Texas; and the United States District Courts for the Central, Eastern, Northern, and Southern Districts of California. *Id.* ¶¶ 1-4.

Mr. Bobrow has familiarity with the subject matter at issue in this proceeding and in the related district court case: *Yangtze Memory Technologies Co., Ltd. v. Micron Technology, Inc. & Micron Consumer Products Group, LLC*, Case No. 3:23-cv-05792-RFL (N.D. Cal., filed Nov. 9, 2023), in which U.S. Patent No. 11,101,276 was asserted by the Patent Owner. Bobrow Declaration ¶ 9.

Mr. Bobrow has read and will comply with the Office Patent Trial Practice Guide and the Board's Rules for Practice for Trials set forth in part 42 of the C.F.R, and he agrees to be subject to the USPTO Code of Professional Responsibility set

forth in 37 C.F.R. §§ 10.20 *et seq.*, and to disciplinary jurisdiction under 37 C.F.R. § 11.19(a). Bobrow Declaration ¶¶ 5-6.

II. ANALYSIS

The facts contained in the Statement of Facts above, and contained in the Bobrow Declaration, establish that there is good cause to admit Mr. Bobrow *pro hac vice* in this proceeding under 37 C.F.R. § 42.10. Lead counsel is a registered practitioner, Mr. Bobrow is an experienced patent litigation attorney, and Mr. Bobrow has familiarity with the subject matter at issue in this proceeding.

III. CONCLUSION

For the foregoing reasons, Petitioner respectfully requests that the Board admit Jared Bobrow *pro hac vice* in this proceeding.

Respectfully submitted,

ORRICK, HERRINGTON & SUTCLIFFE LLP

Dated: April 29, 2025

/Jeremy Jason Lang/

Jeremy Jason Lang
Lead Counsel for Petitioner
Reg. No. 73,064
1000 Marsh Road
Menlo Park, CA 94025-1015
T: (650) 614-7400
F: (650) 614-7401
Email: PTABDocketJLL2@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 29, 2025 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)
Brenda L. Danek (brenda.danek@lw.com)
Steven W. Peters (steven.peters@lw.com)
Amit Makker (amit.makker@lw.com)

/Karen Johnson/

Karen Johnson