

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 OBJECTIONS TO PATENT OWNER’S EXHIBIT 2031,
DECLARATION OF BENJAMIN SMITH IN RESPONSE TO
PETITIONER’S OBJECTIONS TO EVIDENCE**

Pursuant to 37 C.F.R. § 42.64(b)(1), Petitioner submits the following objections to supplemental evidence served November 17, 2025 in this proceeding.

Exhibit 2031 (Declaration of Benjamin Smith in Response to Petitioner's Objections to Evidence):

This declaration by Patent Owner's counsel, acting as a fact witness, purports authenticate Exhibits 2022–30 as true and correct copies of what Patent Owner alleges these exhibits to be. Petitioner objects to Exhibit 2031 as inadmissible hearsay under FRE 801 and 802 not falling under any exception. Petitioner further objects to Exhibit 2031 for lack of foundation and lack of personal knowledge under FRE 602, and as improper lay testimony under FRE 701, to the extent it offers testimony in areas outside of Mr. Smith's area of expertise or fails to properly provide the underlying facts, data, and other required disclosures. Petitioner incorporates by reference its prior objections to Exhibits 2022–30 filed on November 3, 2025.

Dated: November 24, 2025

Respectfully submitted,

/Jeremy Jason Lang/
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CERTIFICATE OF SERVICE

The undersigned hereby confirms that the foregoing paper was caused to be served on November 24, 2025 via electronic mail, upon the following attorneys of record for the Patent Owner:

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