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.: IPR2025-00294
U.S. Patent No. 10,886,291

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. 10,886,291 to Lu et al. ("the '291 Patent")
1002	File History of U.S. Patent No. 10,886,291 ("the '291 FH")
1003	Declaration of Dr. Sanjay K. Banerjee ("Banerjee")
1004	*Curriculum Vitae* of Dr. Sanjay K. Banerjee
1005	U.S. Patent Publication No. 2018/0182771 A1 to Costa et al. ("Costa")
1006	U.S. Patent Publication No. 2016/0204117 A1 to Liu et al. ("Liu")
1007	U.S. Patent Publication No. 2015/0060979 A1 to Lee et al. ("Lee")
1008	U.S. Patent Publication No. 2017/0179026 A1 to Toyama et al. ("Toyama")
1009	Aritome, "NAND Flash Memory Technologies" (2016)
1010	Silvagni, "3D NAND Flash Based on Planar Cells," Computers 2017
1011	Micheloni et al., "Inside Solid State Drives (SSDs)" (2nd Ed. 2018)
1012	U.S. Patent No. 10,475,737 to Tang et al.
1013	Micheloni, "3D Flash Memories" (2016)
1014	U.S. Patent No. 9,853,046 to Lu et al.
1015	Excerpt from YMTC's Exemplary Infringement Claim Chart for U.S. Patent No. 10,886,291 (Ex. C-1 to Disclosure of YMTC II Asserted Claims and Infringement Contentions, dated October 2, 2024) ("Ex. C-1, YMTC's Contentions") [PROTECTIVE ORDER MATERIAL – FILED UNDER SEAL]
1016	U.S. Patent No. 9,245,962 to Yang et al.

Exhibit	Description
1017	U.S. Patent No. 10,283,518 to Lee et al.
1018	Stavitski et al., "Specific contact resistance measurements of metal-semiconductor junctions," *2006 IEEE International Conference on Microelectronic Test Structures*, Austin, TX, USA, 2006, pp. 13-17
1019	Fasoli et al., "Overview and status of bottom-up silicon nanowire electronics," *Materials Science in Semiconductor Processing*, Vol. 15, Issue 6, 2012, pp. 601-614
1020	U.S. Patent Publication No. 2015/0264548 A1 to Lee et al. ("Lee 548")
1021	U.S. Patent No. 9,530,866 to Zhang et al.
1022	Plummer et al., "Silicon VLSI Technology: Fundamentals, Practice and Modeling" (2000)
1023	Certified Translation of KR 101487746 B1 to Lee et al. (including original Korean patent document)
1024	U.S. Patent Publication No. 2017/0154892 to Oh
1025	Minute Order (case schedule), Dkt. No. 141, dated September 18, 2024 in *Yangtze Memory Technologies Company, Ltd. v. Micron Technology, Inc. and Micron Consumer Products Group, LLC*, Case No. 3:23-cv-05792-RFL
1026	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

Exhibit	Description
1027	Plaintiff and Counterclaim Defendant Yangtze Memory Technologies Company, LTD.'s Disclosure of YMTC II Asserted Claims and Infringement Contentions, dated October 2, 2024 in *Yangtze Memory Technologies Company, Ltd. v. Micron Technology, Inc. and Micron Consumer Products Group, LLC*, Case No. 3:23-cv-05792-RFL
1028	Docket from *Yangtze Memory Technologies Company, Ltd. v. Micron Technology, Inc. and Micron Consumer Products Group, LLC*, Case No. 3:24−cv−04223−RFL which has been consolidated with Case No. 3:23-cv-05792-RFL
1029	Declaration of Jared Bobrow in Support of Petitioner's Motion for Admission *Pro Hac Vice*

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. 1029, "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. 10,886,291 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: May 1, 2025

/Jeremy Jason Lang/

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CERTIFICATE OF SERVICE

The undersigned hereby confirms that the foregoing paper was caused to be served on May 1, 2025 via electronic mail, upon the following attorneys of record for the Patent Owner:

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