From: Trials <Trials@USPTO.GOV>
Sent: Monday, April 7, 2025 5:58 AM
To: Davis, James L., Jr.; Trials
Cc: Bonny, Christopher M.; YMTC-Micron-IPRs-Ropes-Service; PTABDocketJJL2; Bobrow, Jared; PTABDocketJ3B3; Jensen, Travis; T61PTABDocket; Lang, Jason
Subject: RE: IPR2025-00098 and IPR2025-00099: Request for Leave to File Preliminary Reply

[EXTERNAL]

Dear Counsel,

Petitioner is authorized to file, within 7 calendar days, a preliminary reply brief of no more than ten pages to respond to the following issues raised in Patent Owner Micron's preliminary response:

1) Whether YMTC is entitled to file an IPR petition
2) Whether YMTC identified all RPIs
3) Whether the Board should exercise its §314(a) discretion

Patent Owner is authorized to file a preliminary sur-reply, also of no more than ten pages. If Petitioner files additional evidence with its reply, Patent Owner may file rebutting documentary evidence with its sur-reply.
Regards,

Andrew Kellogg,
Deputy Chief Clerk, Trials
Patent Trial and Appeal Board
USPTO
andrew.kellogg@uspto.gov
(571) 272-5366

From: Davis, James L., Jr. <James.L.Davis@ropesgray.com>
Sent: Friday, March 28, 2025 6:00 PM
To: Trials <Trials@USPTO.GOV>
Cc: Bonny, Christopher M. <Christopher.Bonny@ropesgray.com>; YMTC-Micron-IPRs-Ropes-Service <YMTC-Micron-IPRs-Ropes-Service@ropesgray.com>; PTABDocketJJL2 <PTABDocketJJL2@orrick.com>; Bobrow, Jared <jbobrow@orrick.com>; PTABDocketJ3B3 <PTABDocketJ3B3@orrick.com>; Jensen, Travis <tjensen@orrick.com>; T61PTABDocket <T61PTABDocket@orrick.com>; Lang, Jason <jlang@orrick.com>
Subject: IPR2025-00098 and IPR2025-00099: Request for Leave to File Preliminary Reply

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To the Honorable Board,

In connection with IPR2025-00098 and IPR2025-00099, Petitioner YMTC seeks leave to file a preliminary reply of ten pages with the option to submit additional evidence limited to the issues raised in Patent Owner Micron's preliminary response:

1) Whether YMTC is entitled to file an IPR petition
2) Whether YMTC identified all RPIs
3) Whether the Board should exercise its §314(a) discretion

Petitioner does not oppose a preliminary sur-reply from Patent Owner of the same length. Petitioner proposes that the preliminary reply be due one week after the Board grants leave and that the preliminary sur-reply be due one week after the preliminary reply is filed. Petitioner is not seeking leave to submit any additional declarations, but does oppose Patent Owner submitting additional evidence to which Petitioner will not have an opportunity to respond.

Petitioner has conferred with Patent Owner Micron and Patent Owner opposes this request. To the extent the Board grants the request, Micron requests a preliminary sur-reply of the same length. And to the extent YMTC submits additional evidence, Micron requests the option to submit rebutting documentary evidence.

The parties are available for a call with the Board at the following times:

Tuesday 4/1: 4-5 pm et
Wednesday 4/2: 12-1, 1:30-2:30, 3:30-5 pm et
Thursday 4/3: 12-5 pm et

The parties can provide additional times if necessary.

Respectfully submitted,
Jim Davis
Counsel for Petitioner YMTC

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