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. PGR2025-00021
U.S. Patent No. 12,010,838 B2

PETITIONER'S UPDATED EXHIBIT LIST AND HEARING DEMONSTRATIVES

As required by the Board's Order Setting Oral Argument (Paper 38), Petitioner hereby submits its hearing demonstratives (Ex. 1083) and associated updated Listing of Exhibits:

Exhibit	Description
1001	U.S. Patent No. 12,010,838 B2 to Lu et al. (the "'838 patent")
1002	File History of U.S. Patent No. 12,010,838 B2 to Lu et al.
1003	Declaration of Dr. Jack C. Lee
1004	*Curriculum Vitae* of Dr. Jack C. Lee
1005	U.S. Patent No. 10,229,929 to Kim et al. ("Kim")
1006	U.S. Patent Publication No. 2014/0191389 A1 to Lee et al. ("Lee")
1007	U.S. Patent No. 9,941,153 to Yang ("Yang")
1008	U.S. Patent No. 9,520,402 to Haller et al. ("Haller")
1009	U.S. Patent No. 10,297,543 to Park et al. ("Park")
1010	U.S. Patent No. 9,589,978 to Yip
1011	Aritome, "NAND Flash Memory Technologies" (2016)
1012	Micheloni et al., "Inside Solid State Drives (SSDs)" (2nd Ed. 2018)
1013	Silvagni, "3D NAND Flash Based on Planar Cells," Computers 2017
1014	U.S. Patent Publication No. 2016/0218107 A1 to Lee ("Lee 107")
1015	U.S. Patent Publication No. 2015/255385 to Lee
1016	U.S. Patent No. 9,373,540 to Hyun
1017	U.S. Patent Publication No. 2011/0031630 A1 to Hashimoto
1018	Excerpts from the File History of PCT/CN2018/098962

Exhibit	Description
1019	File History of U.S. Patent Application No. 16/126,956
1020	File History of U.S. Patent Application No. 16/885,858
1021	U.S. Patent No. 9,343,452 to Yun et al. ("Yun")
1022	U.S. Patent Publication No. 2018/0026046 A1 to Nam et al. ("Nam")
1023	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
1024	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
1025	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
1026	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
1027	Declaration of Jared Bobrow in Support of Petitioner's Motion for Admission *Pro Hac Vice*
1028	Press Release, Micron, Micron and Intel Unveil New 3D NAND Flash Memory (Mar. 26, 2015) ("Micron '3D NAND Flash Memory' Press Release")
1029	Press Release, Micron, *Micron and WekaIO Win Best of Show Award at the Flash Memory Summit 2019* (Aug. 29, 2019) ("Micron 'Best of Show Award' Press Release")

Exhibit	Description
1030	Micron Technology, Inc., Annual Report (Form 10-K) (Oct. 4, 2024)
1031	Ministry of Industry and Information Technology, *The Ministry of Industry and Information Technology Officially Announced the "National Integrated Circuit Industry Development Promotion Outline"* (Jun. 26, 2014) (https://www.cac.gov.cn/2014-06/26/c_1111325916.htm) ("National IC Development Promotion Outline")
1032	Certified English Translation of Ex. 1031 (National IC Development Promotion Outline)
1033	Karen M. Sutter et al., Cong. Rsch. Serv., R47558, *Semiconductors and the CHIPS Act: The Global Context* (2023)
1034	Alex He, *Case Study: From Paper Tiger to Real Tiger? The Development of China's Semiconductor Industry*, CENTRE FOR INT'L GOVERNANCE INNOVATION 14 (2021)
1035	State-Owned Assets Supervision and Administration Commission of the State Council (SASAC), *Definition of "State-Owned Enterprise"* (July 4, 2019) (https://www.sasac.gov.cn/n2588040/n2590387/n9854212/c11647665/content.html) ("SASAC Definition")
1036	Certified English Translation of Ex. 1035 (SASAC Definition)
1037	China's State Council, *Notice of the State Council on Issuing "Made in China 2025"* (May 19, 2015) (https://www.gov.cn/zhengce/content/2015-05/19/content_9784.htm) ("Made in China 2025")
1038	Certified English Translation of Ex. 1037 (Made in China 2025)
1039	Karen M. Sutter, Cong. Rsch. Serv., R46767, *China's New Semiconductor Policies: Issues for Congress* (2021)

Exhibit	Description
1040	Liu Yuanchun et al., *Accelerating the Realization of High-Level Scientific and Technological Self-Reliance*, PEOPLE (July 15, 2024) (http://paper.people.com.cn/zgjjzk/html/2024-07/15/nw.zgjjzk_20240715_1-05.htm) ("*People's Paper* Article")
1041	Certified English Translation of Ex. 1040 (*People's Paper* Article)
1042	YMTC, *Yangtze Memory Technologies Co. Ltd. Officially Established* (Aug. 1, 2016) (https://www.ymtc.com/cn/news/28.html) ("YMTC Press Release")
1043	Certified English Translation of Ex. 1042 (YMTC Press Release)
1044	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)
1045	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) ("*Yahoo!* Article")
1046	Baidu, *Yangtze Memory Increases Capital and Expands Capacity to RMB 100 Billion, Big Fund Phase II Forms a Partnership with Local Hubei State-owned Assets* (Mar. 2, 2023) (https://baijiahao.baidu.com/s?id=1759256650733024656&wfr=spider&for=pc) ("*Baidu* Article")
1047	Certified English Translation of Ex. 1046 (*Baidu* Article)
1048	YMTC's Rule 7.1 Corporate Disclosure Statement, *Yangtze Memory Technologies Company, Ltd. v. Micron Technology, Inc.*, Case No. 5:23-cv-05792-VKD (N.D. Cal. Nov. 9, 2023)
1049	Lianhe Credit Rating Co., Ltd., Wuhan Optics Valley Financial Holding Group Co., Ltd., 2024 Tracking Rating Report (Jun. 28, 2024) ("2024 Tracking Rating Report")
1050	Certified English Translation of Ex. 1049 (2024 Tracking Rating Report)

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1051	State-Owned Assets Supervision and Administration Commission of the State Council (SASAC), *Focusing on Key Points and Making Breakthroughs in Innovation, Hubei Solidly Promotes the Deepening and Improvement Actions to Go Deeper and More Concrete* (Mar. 25, 2024) (www.sasac.gov.cn/n4470048/n29955503/n30329277/n30329358/c30380577/content.html) ("Statement of China's State Council")
1052	Certified English Translation of Ex. 1051 (Statement of China's State Council)
1053	Sina Finance, *Yangtze Memory's "Double 11 Performance" Surpassed Samsung's for the First Time* (Nov. 12, 2024) (https://finance.sina.com.cn/roll/2024-11-12/doc-incvupap6483110.shtml) ("*Sina Finance* Article")
1054	Certified English Translation of Ex. 1053 (*Sina Finance* Article)
1055	Southeast University, *Yangtze Memory Technologies Co., Ltd. 2024 Campus Recruitment* (Mar. 13, 2024) (https://seu.91job.org.cn/sub-station/lectureDetail?xjhid=1000000000301932&xxdm=10286) ("Southeast Univ., YMTC 2024 Campus Recruitment")
1056	Certified English Translation of Ex. 1055 (Southeast Univ., YMTC 2024 Campus Recruitment)
1057	Wuhan University of Science and Technology, *Yangtze Memory Technologies Co., Ltd.* 2020 Campus Recruitment Introduction (Sept. 10, 2019) (https://wust.91wllm.cn/teachin/view/id/97310) ("Wuhan Univ. of Sci. and Tech., YMTC 2020 Campus Recruitment Introduction")
1058	Certified English Translation of Ex. 1057 (Wuhan Univ. of Sci. and Tech., YMTC 2020 Campus Recruitment Introduction)
1059	China University of Petroleum, *Yangtze Memory 2025 Campus Recruitment* (Feb. 20, 2025) (https://career.cup.edu.cn/job/view/id/618140) ("China Univ. Of Petroleum, YMTC 2025 Campus Recruitment")

Exhibit	Description
1060	Certified English Translation of Ex. 1059 (China Univ. Of Petroleum, YMTC 2025 Campus Recruitment)
1061	Yoko Kubota et al., *U.S. Chip Equipment Suppliers Suspend Business Activities at Yangtze Memory*, 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")
1062	Certified English Translation of Ex. 1061 (*WSJ China* Article)
1063	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)
1064	Demetri Sevastopulo, *Bipartisan Group Urges US Blacklist for "Beijing-Directed" Chipmaker*, FINANCIAL TIMES (Sept. 20, 2022) (https://www.ft.com/content/173eb5b7-c211-4fa8-af8e-93382ed12836) ("*Financial Times* Article")
1065	U.S. Senator Charles E. Schumer, *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* (Dec. 16, 2022) ("Schumer Statement")
1066	U.S. Department of Defense, *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* (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/)

Exhibit	Description
1067	U.S. Department of Defense, *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)* (https://media.defense.gov/2024/Jan/31/2003384819/-1/-1/0/1260H-LIST.PDF)
1068	*Oversight of the USPTO: Hearing Before the Subcomm. On Intellectual Property*, 118th Cong. (2023) (Testimony of Katherine Vidal, Undersecretary of Commerce for IP and Director of USPTO)
1069	China's State Council, *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* (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")
1070	Certified English Translation of Ex. 1069 (State Council Notice on Policies to Promote Development of IC)
1071	Declaration of Karen Lee, Translator (Mar. 10, 2025)
1072	Declaration of Fei-Xue Qian, Translator (Mar. 10, 2025)
1073	Order Granting Motion to Stay Case Pending *Inter Partes* Review, *Yangtze Memory Techs. Co., Ltd. v. Micron Tech., Inc. et al.*, Case No. 23-cv-05792-RFL, Docket No. 243 (N.D. Cal. Mar. 14, 2025)
1074	Plaintiff and Counterclaim Defendant Yangtze Memory Technologies Company, Ltd.'s Disclosure of YMTC I Asserted Claims and Infringement Contentions, *Yangtze Memory Techs. Co., Ltd. v. Micron Tech., Inc. et al.*, Case No. 3:23-cv-05792-RFL (N.D. Cal. May 6, 2024)
1075	Reply Declaration of Dr. Jack C. Lee
1076	Transcript of the February 11, 2026 Deposition of Konstantinos Giapis in PGR2025-00021

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1077	Excerpt from Merriam Webster Dictionary (1998)
1078	Confidential Excerpt from Exhibit K-1 to YMTC's October 2, 2024 Infringement Contentions from *Yangtze Memory Technologies Company, Ltd. v. Micron Technology, Inc. and Micron Consumer Products Group, LLC*, Case No. 3:23-cv-05792-RFL [Subject to Motion to Seal]
1079	Transcript of the November 12, 2025 Deposition of Konstantinos Giapis in IPR2025-00189
1080	Falcony, Characterization of Excess Si in Nonsoichiometric SiO2 Films by Optical and Surface Analysis Techniques, J. Electrochem. So., Vol 144, No. 1, 379-383 (Jan 1997)
1081	Bedjaoui et al., Si nanocrystal-containing SiO_x (x<2) produced by thermal annealing of PECVD realized thin films, Materials Science and Engineering B 124-125, 508-512 (2005)
1082	U.S. Patent No. 9,728,547 to Ohsaki et al.
1083	Petitioner's Hearing Demonstratives

Respectfully submitted,

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Dated: May 28, 2026

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CERTIFICATE OF SERVICE

The undersigned hereby confirms that the foregoing paper and associated exhibit was caused to be served on May 28, 2026 via electronic mail, upon the following attorneys of record for the Patent Owner:

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