

Filed on behalf of: Yangtze Memory Technologies Company, Ltd.

Entered on: May 28, 2026

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.

PGR2025-00021
Patent 12,010,838

PATENT OWNER'S UPDATED EXHIBIT LIST

Pursuant to 37 C.F.R. § 42.63(e), Patent Owner respectfully submits the following updated Exhibit List:

Exhibit	Description
2001	Defendants' Preliminary Invalidity Contentions and Document Production Accompanying Invalidity Contentions re YMTC II Asserted Patents (Patent Local Rules 3-3 and 3-4), <i>Yangtze Memory Technologies Company, Ltd. v. Micron Technology, Inc.</i> , No. 3:23-cv- 05792-RFL (N.D. Cal. Nov. 25, 2024) (excerpts)
2002	Civil Minutes, <i>Yangtze Memory Technologies Company, Ltd. v. Micron Technology, Inc.</i> , No. 3:23-cv-05792-RFL (N.D. Cal. Sept. 18, 2024), ECF No. 141
2003	Order Granting Stipulation to Extend Certain Deadlines Pursuant to Patent L.R. 4-2 and the Scheduling Order (ECF No. 141) Pursuant to Civil Local Rule 6-1(b), <i>Yangtze Memory Technologies Company, Ltd. v. Micron Technology, Inc.</i> , No. 3:23-cv-05792-RFL (N.D. Cal. Jan. 8, 2025), ECF No. 194
2004	Order Granting Motion to Stay Case Pending <i>Inter Partes</i> Review, <i>Yangtze Memory Technologies Company, Ltd. v. Micron Technology, Inc.</i> , No. 3:23-cv-05792-RFL (N.D. Cal. Mar. 14, 2025), ECF No. 243
2005	Plaintiff/Counterclaim Defendant Yangtze Memory Technologies Company, Ltd.'s and Counterclaim Defendant Yangtze Memory Technologies, Inc.'s Opposition to Micron's Motion to Stay Case Pending <i>Inter Partes</i> Review and Post-Grant Proceedings, <i>Yangtze Memory Technologies Company, Ltd. v. Micron Technology, Inc.</i> , No. 3:23-cv-05792-RFL (N.D. Cal. Feb. 3, 2025), ECF No. 221
2006	Declaration of Konstantinos Giapis ("Giapis")
2007	<i>Curriculum Vitae</i> of Konstantinos Giapis
2008-2017	RESERVED

Exhibit	Description
2018	Order Granting Motion to Consolidate, <i>Yangtze Memory Technologies Company, Ltd. v. Micron Technology, Inc.</i> , No. 3:23-cv-05792-RFL (N.D. Cal. Aug. 21, 2024), ECF No. 106
2019	Declaration of Konstantinos Giapis in Support of Patent Owner's Response ("Giapis2")
2020	U.S. Patent No. 9,006,884 B2 ("884 Patent")
2021	U.S. Patent No. 11,145,666 B2 ("666 Patent")
2022	Excerpt of File History U.S. Patent Application No. 16/126,956
2023	Counterpoint Tech. Mkt. Rsch., <i>Scaling to 1,000-Layer 3D NAND in the AI Era</i> (July 2024), https://filecache.mediaroom.com/mr5mr_lamresearch/182770/Counterpoint_Research_Paper_Scaling_to_1000-Layer_3D_NAND_in_the_AI_Era.pdf ("Counterpoint")
2024	3D FLASH MEMORIES (Rino Micheloni ed. 2016) ("Micheloni") (excerpt)
2025	EFY Bureau, <i>At 20nm, Chips Have Features Sized Ten Times Smaller Than the Wavelength of Laser Used in Lithography</i> , electronicsforu.com (Dec. 4, 2014), https://www.electronicsforu.com/technology-trends/interviews/20nm-chips-features-sized-ten-times-smaller-wavelength-laser-used-lithography
2026	Press Release, ASML, ASML Extends ArF Leadership (Dec. 6, 2006), https://www.asml.com/en/news/press-releases/2006/asml-extends-arf-leadership (last visited Nov. 17, 2025)
2027	ASML, <i>Light and Lasers</i> , https://www.asml.com/en/technology/lithography-principles/light-and-lasers (last visited Nov. 17, 2025)

Exhibit	Description
2028	James D. Plummer et al., SILICON VLSI TECHNOLOGY: FUNDAMENTALS, PRACTICE AND MODELING (Prentice Hall Elecs. & VLSI Series) (Charles Sodini ed. 2000) ("Plummer") (excerpts)
2029	Steven S. Zumdahl et al., CHEMISTRY: AN ATOMS FIRST APPROACH (3d ed. 2021) ("Zumdahl") (excerpt)
2030	Transcript of the Deposition of Jack C. Lee, Ph.D., <i>Micron Technology, Inc. v. Yangtze Memory Technologies Company, Ltd.</i> , PGR2025-00021 (P.T.A.B. Oct. 30, 2025) ("Lee '838 Dep.")
2031	Transcript of the Deposition of Jack C. Lee, Ph.D., <i>Micron Technology, Inc. v. Yangtze Memory Technologies Company, Ltd.</i> , IPR2025-00189 (P.T.A.B. Aug. 13, 2025) ("Lee '666 Dep.")
2032	Exhibit 1 entered in the Deposition of Jack C. Lee, Ph.D., <i>Micron Technology, Inc. v. Yangtze Memory Technologies Company, Ltd.</i> , IPR2025-00189 (P.T.A.B. Aug. 13, 2025) (Ex. 2031) ("Lee '666 Dep. Ex. 1")
2033	Exhibit 2 entered in the Deposition of Jack C. Lee, Ph.D., <i>Micron Technology, Inc. v. Yangtze Memory Technologies Company, Ltd.</i> , IPR2025-00189 (P.T.A.B. Aug. 13, 2025) (Ex. 2031) ("Lee '666 Dep. Ex. 2")
2034	Exhibit 3 entered in the Deposition of Jack C. Lee, Ph.D., <i>Micron Technology, Inc. v. Yangtze Memory Technologies Company, Ltd.</i> , IPR2025-00189 (P.T.A.B. Aug. 13, 2025) (Ex. 2031) ("Lee '666 Dep. Ex. 3")
2035	Exhibit 4 entered in the Deposition of Jack C. Lee, Ph.D., <i>Micron Technology, Inc. v. Yangtze Memory Technologies Company, Ltd.</i> , IPR2025-00189 (P.T.A.B. Aug. 13, 2025) (Ex. 2031) ("Lee '666 Dep. Ex. 4")

Exhibit	Description
2036	Exhibit 5 entered in the Deposition of Jack C. Lee, Ph.D., <i>Micron Technology, Inc. v. Yangtze Memory Technologies Company, Ltd.</i> , IPR2025-00189 (P.T.A.B. Aug. 13, 2025) (Ex. 2031) (“Lee ’666 Dep. Ex. 5”)
2037	Exhibit 6 entered in the Deposition of Jack C. Lee, Ph.D., <i>Micron Technology, Inc. v. Yangtze Memory Technologies Company, Ltd.</i> , IPR2025-00189 (P.T.A.B. Aug. 13, 2025) (Ex. 2031) (“Lee ’666 Dep. Ex. 6”)
2038	Exhibit 7 entered in the Deposition of Jack C. Lee, Ph.D., <i>Micron Technology, Inc. v. Yangtze Memory Technologies Company, Ltd.</i> , IPR2025-00189 (P.T.A.B. Aug. 13, 2025) (Ex. 2031) (“Lee ’666 Dep. Ex. 7”)
2039	Exhibit 8 entered in the Deposition of Jack C. Lee, Ph.D., <i>Micron Technology, Inc. v. Yangtze Memory Technologies Company, Ltd.</i> , IPR2025-00189 (P.T.A.B. Aug. 13, 2025) (Ex. 2031) (“Lee ’666 Dep. Ex. 8”)
2040	Exhibit 9 entered in the Deposition of Jack C. Lee, Ph.D., <i>Micron Technology, Inc. v. Yangtze Memory Technologies Company, Ltd.</i> , IPR2025-00189 (P.T.A.B. Aug. 13, 2025) (Ex. 2031) (“Lee ’666 Dep. Ex. 9”)
2041	U.S. Patent Application Publication No. 2018/0301460 A1 (“Yoo”)
2042	A.E.T. Kuiper et al., <i>Oxidation Behaviour of LPCVD Silicon Oxynitride Films</i> , 33/34 APPLIED SURFACE SCI. 757 (1988) (“Kuiper”)
2043	Yen-Po Lin & Jenn-Gwo Hwu, <i>Quality Improvement in LPCVD Silicon Nitrides by Anodic and Rapid Thermal Oxidations</i> , 7 ELECTROCHEMICAL SOLID-STATE LETTERS G87 (2004) (“Lin”)

Exhibit	Description
2044	X. Y. Chen et al., <i>Annealing and Oxidation of Silicon Oxide Films Prepared By Plasma-Enhanced Chemical Vapor Deposition</i> , 97 J. APPLIED PHYSICS 014913 (2005) ("Chen")
2045	A. Barranco et al., <i>Electronic State Characterization of SiO_x Thin Films Prepared by Evaporation</i> , 97 J. APPLIED PHYSICS 113714 (2005) ("Barranco")
2046	Declaration of B. Thomas Watson In Response To Petitioner's Objections to Evidence, with Appendices A-F [<i>served only</i>]
2047	Transcript of the Deposition of Jack C. Lee, Ph.D., <i>Micron Technology, Inc. v. Yangtze Memory Technologies Company, Ltd.</i> , PGR2025-00021 (P.T.A.B. Mar. 25, 2026), including Exhibit 1 (Deposition of Jack C. Lee, Ph.D., <i>Micron Technology, Inc. v. Yangtze Memory Technologies Company, Ltd.</i> , IPR2025-00189 (P.T.A.B. Dec. 23, 2025))
2048	Patent Owner's Demonstratives

Respectfully submitted,

Dated: May 28, 2026

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CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6(e), I certify that on this 28th day of May, 2026, a true and correct copy of the foregoing **Patent Owner's Updated Exhibit List and Exhibit 2048** were served by electronic mail on Petitioner's lead and backup counsel at the following email addresses:

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