

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

MICRON TECHNOLOGY, INC.,
Petitioner,

v.

VERVAIN, LLC,
Patent Owner.

Case No.: IPR2021-01549
U.S. Patent No. 9,997,240
Original Issue Date: June 12, 2018

Title: LIFETIME MIXED LEVEL NON-VOLATILE MEMORY SYSTEM

**PETITIONER'S MOTION FOR ADMISSION *PRO HAC VICE* OF
JARED BOBROW PURSUANT TO 37 C.F.R. § 42.10**

LISTING OF EXHIBITS

Exhibit	Description
1001-1004	<i>Intentionally omitted</i>
1005	U.S. Patent No. 9,997,240 (the “240 patent”)
1006	File History of U.S. Patent No. 9,997,240
1007-1008	<i>Intentionally omitted</i>
1009	Declaration of Dr. David Liu (“Liu Decl.”) – IPR2021-01549
1010	U.S. Patent Application Publication No. 2011/0099460 (“Dusija”)
1011	U.S. Patent Application Publication No. 2008/0140918 (“Sutardja”)
1012	U.S. Patent Application Publication No. 2009/0327591 (“Moshayedi”)
1013	<i>Intentionally omitted</i>
1014	Betty Prince, Semiconductor Memories – A Handbook of Design, Manufacture, and Application (2d ed. 1991) (“Prince”)
1015	U.S. Patent No. 8,120,960 (“Varkony”)
1016	U.S. Patent No. 7,000,063 (“Friedman”)
1017	U.S. Patent Application Publication No. 2005/0251617 (“Sinclair”)
1018	Jan Axelson, USB Mass Storage: Designing and Programming Devices and Embedded Hosts (2006) (“Axelson”)
1019	Rino Micheloni et al., Inside NAND Flash Memories (1 st ed. 2010) (“Micheloni”)

Exhibit	Description
1020	U.S. Patent Application Publication No. 2011/0115192 (“Y. Lee”)
1021	U.S. Patent No. 7,453,712 (“Kim”)
1022	U.S. Patent Application Publication No. 2011/0096601 (“Gavens”)
1023	U.S. Patent No. 8,078,794 (“C. Lee”)
1024	U.S. Patent No. 7,733,729 (“Boeve”)
1025	Microsoft Computer Dictionary, Fifth Edition, 2002, definition of read-after-write
1026	Merriam-Webster’s Collegiate Dictionary, Eleventh Edition, 2006, definition of periodic
1027	New Oxford American Dictionary, 3 rd Edition, 2010, definition of module
1028	U.S. Patent Application Publication No. 2010/0172180 (“Paley”)
1029	U.S. Patent No. 7,853,749 (“Kolokowsky”)
1030	U.S. Patent Application Publication No. 2010/0017650 (“Chin”)
1031	European Patent Specification No. EP 2,291,746 B1 (“Radke”)
1032	U.S. Patent Application Publication No. 2015/0214476 (“Matsui”)
1033	<i>Intentionally omitted</i>
1034	Complaint for Patent Infringement, Dkt. No. 1, <i>Vervain, LLC v. Micron Technology, Inc., Micron Semiconductor Products, Inc., and Micron Technology Texas, LLC</i> , Case No. 6:21-cv-00487-ADA (May 10, 2021 W.D. Tex.)

Exhibit	Description
1035	Agreed Scheduling Order, Dkt. No. 24, dated September 16, 2021, in <i>Vervain, LLC v. Micron Technology, Inc., Micron Semiconductor Products, Inc., and Micron Technology Texas, LLC</i> , Case No. 6:21-cv-00487-ADA
1036-1037	<i>Intentionally omitted</i>
1038	Scott McKeown, “WDTX ‘Implausible Schedule’ & Cursory Markman Order Highlighted,” Ropes & Gray, Patents Post-Grant, Inside Views & News Pertaining to the Nation’s Busiest Patent Court, June 2, 2021
1039	Dani Kass, Judge Albright Now Oversees 20% of New U.S. Patent Cases, Law360, March 10, 2021
1040	Brian Dipert and Markus Levy, Designing with Flash Memory (1994) (“Dipert & Levy”)
1041	U.S. Patent No. 7,366,826 (“Gorobets”)
1042	U.S. Patent No. 6,901,498 (“Conley”)
1043	U.S. Patent No. 8,356,152 (“You”)
1044-1046	<i>Intentionally omitted</i>
1047	Ashok Sharma, Advanced Semiconductor Memories, Architectures, Designs, and Applications (2003) (“Sharma”)
1048	<i>Intentionally omitted</i>
1049	U.S. Patent No. 5,936,971 (“Harari”)
1050-1054	<i>Intentionally omitted</i>
1055	New Oxford American Dictionary, 3 rd Edition, 2010, definitions of frequency and threshold
1056	Declaration of Jared Bobrow in Support of Petitioner’s Motion for Admission <i>Pro Hac Vice</i> - IPR2021-01549

Pursuant to 37 C.F.R. § 42.10, Petitioner Micron Technology, Inc. (“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. 1056, “Bobrow Declaration”), establish good cause to admit Mr. Bobrow *pro hac vice* in this proceeding.

Lead counsel Jeremy Jason Lang is a registered practitioner.

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