

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

YANGTZE MEMORY TECHNOLOGIES COMPANY, LTD.,
Petitioner
v.

MICRON TECHNOLOGY, INC.
Patent Owner

Case No. IPR2025-00098
U.S. Patent No. 8,945,996
Issue Date: February 3, 2015

Title: METHODS OF FORMING CIRCUITRY COMPONENTS AND
METHODS OF FORMING AN ARRAY OF MEMORY CELLS

PATENT OWNER'S REQUEST FOR DIRECTOR REVIEW

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LISTING OF EXHIBITS

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2001	Press Release, Micron, <i>Micron and Intel Unveil New 3D NAND Flash Memory</i> (Mar. 26, 2015) (“Micron ‘3D NAND Flash Memory’ Press Release”)
2002	Press Release, Micron, <i>Micron and WekaIO Win Best of Show Award at the Flash Memory Summit 2019</i> (Aug. 29, 2019) (“Micron ‘Best of Show Award’ Press Release”)
2003	Micron Technology, Inc., Annual Report (Form 10-K) (Oct. 4, 2024)
2004	National Integrated Circuit Industry Development Promotion Outline (Ministry of Industry and Information Technology): Ministry of Industry and Information Technology, <i>The Ministry of Industry and Information Technology Officially Announced the “National Integrated Circuit Industry Development Promotion Outline”</i> (Jun. 26, 2014) (https://www.cac.gov.cn/2014-06/26/c_1111325916.htm) (“National IC Development Promotion Outline”)
2005	Certified English Translation of EX2004 (National IC Development Promotion Outline)
2006	KAREN M. SUTTER ET AL., CONG. RSCH. SERV., R47558, SEMICONDUCTORS AND THE CHIPS ACT: THE GLOBAL CONTEXT (2023)
2007	Alex He, <i>Case Study: From Paper Tiger to Real Tiger? The Development of China's Semiconductor Industry</i> , CENTRE FOR INT'L GOVERNANCE INNOVATION 14 (2021)

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2011	Certified English Translation of EX2010 (Made in China 2025)
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2013	Accelerating the realization of high-level scientific and technological self-reliance (People): Liu Yuanchun et al., <i>Accelerating the Realization of High-Level Scientific and Technological Self-Reliance</i>, PEOPLE (July 15, 2024) (http://paper.people.com.cn/zgjjzk/html/2024-07/15/nw.zgjjzk_20240715_1-05.htm) ("People's Paper Article")
2014	Certified English Translation of EX2013 (<i>People's Paper Article</i>)
2015	Yangtze Memory Technologies Co. Ltd. Officially Established (YMTC): YMTC, <i>Yangtze Memory Technologies Co. Ltd. Officially Established</i> (Aug. 1, 2016) (https://www.ymtc.com/cn/news/28.html) ("YMTC Press Release")

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2016	Certified English Translation of EX2015 (YMTC Press Release)
2017	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)
2018	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) (" <i>Yahoo!</i> Article")
2019	Yangtze Memory Increases Capital and Expands Capacity to RMB 100 Billion, Big Fund Phase II Forms a Partnership with Local Hubei State-owned Assets (Baidu): Baidu, <i>Yangtze Memory Increases Capital and Expands Capacity to RMB 100 Billion, Big Fund Phase II Forms a Partnership with Local Hubei State-owned Assets</i> (Mar. 2, 2023) (https://baijiahao.baidu.com/s?id=1759256650733024656&wfr=spider&for=pc) (" <i>Baidu</i> Article")
2020	Certified English Translation of EX2019 (<i>Baidu</i> Article)
2021	YMTC's Rule 7.1 Corporate Disclosure Statement (Nov. 9, 2023), <i>Yangtze Memory Technologies Company, Ltd. v. Micron Technology, Inc.</i> , C.A. No. 5:23-cv-05792-VKD (N.D. Cal.)
2022	Wuhan Optics Valley Financial Holding Group Co., Ltd. 2024 Tracking Rating Report (Lianhe Credit Rating Co., Ltd.): Lianhe Credit Rating Co., Ltd., Wuhan Optics Valley Financial Holding Group Co., Ltd., 2024 Tracking Rating Report (Jun. 28, 2024) ("2024 Tracking Rating Report")
2023	Certified English Translation of EX2022 (2024 Tracking Rating Report)

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2026	Yangtze Memory’s “Double 11 Performance” Surpassed Samsung’s for the First Time (Sina Finance): Sina Finance, <i>Yangtze Memory’s “Double 11 Performance” Surpassed Samsung’s for the First Time</i> (Nov. 12, 2024) (https://finance.sina.com.cn/roll/2024-11-12/doc-incvupap6483110.shtml) (“Sina Finance Article”)
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2028	Yangtze Memory Technologies Co., Ltd. 2024 Campus Recruitment (Southeast University): Southeast University, <i>Yangtze Memory Technologies Co., Ltd. 2024 Campus Recruitment</i> (Mar. 13, 2024) (https://seu.91job.org.cn/substation/lectureDetail?xjhid=1000000000301932&xxdm=10286) (“Southeast Univ., YMTC 2024 Campus Recruitment”)
2029	Certified English Translation of EX2028 (Southeast Univ., YMTC 2024 Campus Recruitment)

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2030	Yangtze Memory Technologies Co., Ltd. 2020 Campus Recruitment Introduction (Wuhan University of Science and Technology): Wuhan University of Science and Technology, <i>Yangtze Memory Technologies Co., Ltd.</i> 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”)
2031	Certified English Translation of EX2030 (Wuhan Univ. of Sci. and Tech., YMTC 2020 Campus Recruitment Introduction)
2032	Yangtze Memory 2025 Campus Recruitment (China University of Petroleum (Beijing)): China University of Petroleum, <i>Yangtze Memory 2025 Campus Recruitment</i> (Feb. 20, 2025) (https://career.cup.edu.cn/job/view/id/618140) (“China Univ. Of Petroleum, YMTC 2025 Campus Recruitment”)
2033	Certified English Translation of EX2032 (China Univ. Of Petroleum, YMTC 2025 Campus Recruitment)
2034	U.S. Chip Equipment Suppliers Suspend Business Activities at Yangtze Memory (Wall Street Journal – China): Yoko Kubota et al., <i>U.S. Chip Equipment Suppliers Suspend Business Activities at Yangtze Memory</i>, 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”)
2035	Certified English Translation of EX2034 (WSJ China Article)
2036	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)

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2037	Demetri Sevastopulo, <i>Bipartisan Group Urges US Blacklist for “Beijing-Directed” Chipmaker</i> , FINANCIAL TIMES (Sept. 20, 2022) (https://www.ft.com/content/173eb5b7-c211-4fa8-af8e-93382ed12836) (“ <i>Financial Times Article</i> ”)
2038	U.S. Senator Charles E. Schumer, <i>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</i> (Dec. 16, 2022) (“Schumer Statement”)
2039	U.S. Department of Defense, <i>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</i> (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/)
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2043	<i>Intentionally Omitted</i>
2044	<i>Oversight of the USPTO: Hearing Before the Subcomm. On Intellectual Property</i> , 118th Cong. (2023) (Testimony of Katherine Vidal, Undersecretary of Commerce for IP and Director of USPTO)

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2045	Press Release, DOJ Office of Public Affairs, Taiwan Company Pleads Guilty to Trade Secret Theft in Criminal Case Involving PRC State-Owned Company (Oct. 28, 2020) (https://www.justice.gov/archives/opa/pr/taiwan-company-pleads-guilty-trade-secret-theft-criminal-case-involving-prc-state-owned) (“DOJ Press Release”)
2046	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: China's State Council, <i>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</i> (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”)
2047	Certified English Translation of EX2046 (State Council Notice on Policies to Promote Development of IC)
2048	Declaration of Karen Lee, Translator (Mar. 10, 2025)
2049	Declaration of Fei-Xue Qian, Translator (Mar. 10, 2025)
2050	Email from Andrew Kellogg (PTAB) regarding IPR2025-00098 and IPR2025-00099: Request for Leave to File Preliminary Reply, dated April 7, 2025

I. INTRODUCTION

Patent Owner Micron Technology, Inc. (“Micron” or “Patent Owner”) respectfully requests Director Review of the Board’s Institution Decision (“ID” or “Decision”) instituting an *inter partes* review of claims 1-4, 6-10, 12-13, 16-18, 23-26, 28, 30, and 32 of U.S. Patent No. 8,945,996 (“the ’996 patent”). Further, Micron requests that the Director stay this IPR proceeding while it renders its decision in this Review, consistent with its Order in the TikTok IPRs (*see infra*).

Yangtze Memory Technologies Company, Ltd. (“YMTC”) is the Petitioner in this IPR. YMTC is China’s state-owned enterprise focused on the manufacture of NAND semiconductor memory devices; there is no factual dispute on this point. IPR2025-00098, Paper 8, 2-12. YMTC has filed several IPR petitions against Micron—the only US-based manufacturer of semiconductor memory devices—in furtherance of the Chinese government’s strategic initiatives in the semiconductor industry.

On March 12, 2025, in its preliminary response, Micron argued that under controlling US Supreme Court precedent (namely, *Return Mail*) YMTC cannot file an IPR petition, because it is not a “person” within the meaning of 35 U.S. Code § 311 (at a minimum, the Board should exercise its discretion to deny institution under 35 U.S. Code § 314(a)).

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On June 2, 2025, in a different IPR proceeding, the Board narrowly interpreted *Return Mail* to allow TikTok (which the Chinese government owns) to file IPR petitions. IPR2024-00757, Paper 33.

Just days later, on June 5, 2025, the acting Director, *sua sponte*, determined that Director Review is appropriate to reconsider the Board's decision in the TikTok proceedings. IPR2024-00757, Paper 34, 3. As a result, the acting Director also stayed the IPR proceedings that were subject to Director Review. *Id.*

While that Director Review was pending, on June 10, 2025, the Board instituted the instant IPR (IPR2025-00098), applying the same reasoning and citing the same authorities as it did in the decision that is subject to Director Review in the TikTok proceedings. IPR2025-00098, Paper 15, 18 (recognizing that the TikTok decision is subject to Director Review).

This Request demonstrates that the Board committed legal error in instituting IPR proceedings here. Micron expects that the Director Review in the TikTok proceedings will address aspects of the Board's decision that led the Board to institute IPR proceedings here. Importantly, this Request also demonstrates that regardless of the Director's ruling in the TikTok proceedings, the Board erred in instituting IPR proceedings here because Micron presented a much different record than in TikTok and uniquely raised discretionary denial under 35 U.S.C. § 314(a) as a basis for non-institution.

II. BACKGROUND: STATEMENT OF CASE

On November 18, 2024, YMTC filed an IPR petition challenging various claims of the '996 patent. IPR2025-00098, Paper 2. On March 12, 2025, Micron filed its preliminary response, demonstrating that the Board should deny institution because (1) YMTC is not a “person” entitled to file an IPR petition, (2) YMTC failed to identify all RPIs, and (3) at a minimum, the Board should exercise its discretion to deny institution. IPR2025-00098, Paper 8, 15-31. On June 10, 2025—despite recognizing that the TikTok IPRs were under Director Review—the Board instituted IPR2025-00098 based on the same reasoning that it invoked in the TikTok IPRs that are under Director Review. IPR2025-00098, Paper 15, 18 (recognizing that the TikTok decision is subject to Director Review).

III. LEGAL STANDARD

Requests for Director Review of a Board's institution decision “shall be limited to decisions presenting (a) an abuse of discretion, (b) important issues of law or policy, (c) erroneous findings of material fact, or (d) erroneous conclusions of law.” See USPTO, Revised Interim Director Review Process at 2.B (Availability of Director Review: AIA Trial Proceedings) (last modified May 23, 2025). A party seeking Director Review must identify matters that the Board “misapprehended or overlooked” (*id.* at 5.A.iii), which occurs when the Board's decision “(1) is clearly unreasonable, arbitrary, or fanciful; (2) is based on an erroneous conclusion of law;

(3) rests on clearly erroneous fact findings; or (4) involves a record that contains no evidence on which the Board could rationally base its decision.” *Ultratec, Inc. v. CaptionCall, LLC*, 872 F.3d 1267, 1272 (Fed. Cir. 2017); 37 C.F.R. § 42.71(c)-(d).

IV. ARGUMENT

A. The Board Based its Institution Decision on Erroneous Conclusions of Law and Factual Findings

Micron's preliminary response demonstrates that institution was improper because (1) YMTC is not “person” and thus is not entitled to file an IPR petition, and (2) YMTC failed to identify all RPis. IPR2025-00098, Paper 8, 15-31. As demonstrated below, in rejecting these arguments, the Board's institution decision commits both legal and factual errors.

First, the preliminary response demonstrates that under the controlling *Return Mail* precedent, a “sovereign” (and those under its control) is not a person that may file an IPR petition. IPR2025-00098, Paper 8, 16 (citing *Return Mail, Inc. v. U.S. Postal Serv.*, 587 U.S. 618, 626 (2019)). Thus, YMTC¹, like the USPS, cannot file

¹ The patent owner in TikTok provided a very thin factual record (just a few exhibits) on the issue of government ownership and control, which the Board found “too speculative to be credited” to show that the Chinese government owned and controlled TikTok. IPR2024-00757, Paper 33, 14. By contrast, Micron provided a

an IPR petition. *Id.*, 16-17. Indeed, YMTC is just like the USPS in relevant respects: both are independent enterprises that a government controls. *Id.*, 17.

The Board committed legal error in its decision by concluding that because YMTC is a “company,” it can file an IPR petition. IPR2025-00098, Paper 15, 17. As the preliminary response explains, in 1970, Congress transformed the government’s postal service from a cabinet-level department (i.e., the Post Office Department) into a self-sustaining “independent” enterprise (i.e., the USPS), controlled by the U.S. government. IPR2025-00098, Paper 8, 17 (citing The Postal Reorganization Act, Pub. L. No. 91-375, 84 Stat. 720 §201 (1970)). Thus, interpreting *Return Mail*, as the Board did, to allow an entity that a government controls to file an IPR petition merely because it is a “company” constitutes legal error. Further, while the Board’s decision states that Petitioner does not identify any basis to exclude a “company” as a person, the decision overlooks the critical fact that the USPS is an independent entity under government control, just like YMTC

fulsome factual record (with dozens of exhibits) supporting its assertions (e.g., regarding Chinese government ownership and control of YMTC and its plans to control the semiconductor sector). For instance, Micron showed that U.S. policy makers and the U.S. administration agree that the Chinese government controls YMTC. IPR2025-00098, Paper 8, 2-12.

is a “company” under the Chinese Communist Party’s (CCP’s) control. IPR2025-00098, Paper 15, 17.

The Board also commits legal error by interpreting *Return Mail* to require a “government-specific analysis,” namely, whether an entity receives different treatment in an adversarial proceeding than a private party. IPR2025-00098, Paper 15, 18. But *Return Mail* imposed no such requirement. The decision merely explained why it was not surprising that relevant statutes define “person” to exclude governments (and the companies under government control). *Return Mail*, 587 U.S. 634-36. The underlying reasoning aside, the statutory framework governing IPRs precludes governments (and companies under government control) from filing IPRs. *Id.*, 626. Put simply, there is no discretion to exercise here because YMTC is not a “person” and thus cannot file an IPR. Regardless, the Board commits a factual error here, because it fails to consider the different treatment (even if that were a requirement) that YMTC may receive in view of its designations, e.g., as an entity on the U.S. Department of Commerce’s “Entity List.” IPR2025-00098, Paper 8, 10-12.

Second, in addressing the RPI issue, the Board effectively punts, holding that while the Chinese government may be an RPI, parties can address that in future proceedings. IPR2025-00098, Paper 15, 21. This cart-before-the-horse analysis amounts to legal error because resolution of the RPI issue is both a threshold

determination and a condition precedent to the maintenance of an IPR preceding and necessarily demands termination of the IPR proceedings with respect to this patent. Micron's preliminary response demonstrates that because the one-year statutory time to file an IPR has long past, resetting the original filing date to add China (as the Board should) would time-bar the IPR and require termination.² IPR2025-00098, Paper 8, 26-27.

Moreover, even if the Board were to allow the addition of the Chinese government at this late date as an RPI, doing so would require termination of the IPR, because the Chinese government cannot be a petitioner even under the Board's narrow view of *Return Mail*.

B. The Board Erred in Declining to Exercise Its Discretion to Deny Institution

The preliminary response demonstrates that, at a minimum, the Board should exercise its discretion under 35 U.S.C. § 314(a) to deny institution because of the

² In TikTok, the Board had joined several other petitioners into one proceeding such that the IPR would continue regardless of any *Return Mail* ruling. IPR2024-00757, Paper 33, 15 (“Thus, even if we terminated TikTok’s IPRs, this would not require termination of the joined parties’ IPRs.”). By contrast, there are no joined parties in the Micron/YMTC IPRs.

control that the Chinese government has over both YMTC, as the petitioner, and the Petition. IPR2025-00098, Paper 8, 27-28. The TikTok proceedings do not raise the issue of discretionary denial under 35 U.S.C. § 314(a). Micron's preliminary response explains that the Director (and Board under the Director's direction) has "broad" and "complete discretion" in discretionarily denying petitions. *Id.*, 27 (citing *Harmonic Inc. v. Avid Tech., Inc.*, 815 F.3d 1356, 1367 (Fed. Cir. 2016)). In its institution decision, however, the Board legally errs by treating Micron's argument as one that falls under the new discretionary denial factors which, due to the timing of Micron's preliminary response, the Board cannot consider. IPR2025-00098, Paper 15, 22. As the preliminary response expressly cites—under the old discretionary denial guidance—the Board has discretionarily denied a corporate entity's petition because the entity was in privity with the U.S. government (like YMTC is with the Chinese government). IPR2025-00098, Paper 8, 27-28 (citing *Microsoft Corp. v. Sci. Applications Int'l Corp.*, IPR2019-01311, Paper 35 at 13-14 (PTAB Jan. 27, 2020)). Applying this precedent here would require joinder of the Chinese government, which would reset the original filing date and require termination of the IPR.

Moreover, the Board rests its rejection of discretionary denial under 35 U.S.C. § 314(a) on its incorrect reading of *Return Mail*. IPR2025-00098, Paper 15, 22. Under the correct reading of *Return Mail*, YMTC is a sovereign that cannot file an

IPR. At a minimum, the Board should exercise its discretion to deny institution to prevent YMTC from escaping the holding of *Return Mail* based on technicalities surrounding how the Chinese government decided to organize its operations.

V. CONCLUSION

Accordingly, the Director should stay this IPR proceeding while it decides this Request and then vacate the Board's institution decision.

Respectfully submitted,

Dated: June 24, 2025

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CERTIFICATE OF SERVICE

The undersigned hereby confirms that the foregoing Patent Owner's Request for Director Review was caused to be served on June 24, 2025 via electronic mail, upon the following attorneys of record for Petitioner:

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