

HOLLAND & HART, LLP

Erik F. Stidham
A. Dean Bennett
800 W. Main Street, Suite 1750
Boise, ID 83702-7714
Telephone: (208) 342-5000
efstidham@hollandhart.com
adbennett@hollandhart.com

WILSON SONSINI GOODRICH & ROSATI, P.C.

Gregory L. Watts (admitted *pro hac vice*)
701 Fifth Avenue, Suite 5100
Seattle, WA 98014
Telephone: (206) 883-2500
gwatts@wsgr.com

WILSON SONSINI GOODRICH & ROSATI, P.C.

Ignacio E. Salceda (admitted *pro hac vice*)
Betty Chang Rowe (admitted *pro hac vice*)
650 Page Mill Road
Palo Alto, CA 94304-1050
Telephone: (650) 493-9300
isalceda@wsgr.com
browe@wsgr.com

*Attorneys for Defendants Micron Technology, Inc.,
Sanjay Mehrotra, and Mark Murphy*

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF IDAHO

In Re: MICRON TECHNOLOGY, INC.
SECURITIES LITIGATION

Case No. 1:25-cv-00191-BLW

**DECLARATION OF BETTY C. ROWE IN
SUPPORT OF DEFENDANTS' MOTION
TO DISMISS THE AMENDED CLASS
ACTION COMPLAINT**

THIS DOCUMENT RELATES TO:

All Actions.

I, Betty C. Rowe, hereby declare:

1. I am an attorney duly licensed to practice law in the State of California and admitted *pro hac vice* before this Court. I am an attorney at the law firm of Wilson Sonsini Goodrich & Rosati, P.C., counsel for defendants Micron Technology, Inc., Sanjay Mehrotra, and Mark Murphy in this action. I submit this Declaration in support of Defendants' Motion to Dismiss the Amended Class Action Complaint. I am familiar with the facts set forth herein and could and would testify thereto if necessary to the following:

2. Attached hereto as **Exhibit 1** is a true and correct copy of Chart of Challenged Statements.

3. Attached hereto as **Exhibit 2** is a true and correct copy of Semiconductor Industry Association, "*Chipmakers Are Ramping Up Production to Address Semiconductor Shortage. Here's Why that Takes Time.*"

4. Attached hereto as **Exhibit 3** is a true and correct copy of FactSet:callstreet Transcript of Micron's FQ2-23 Earnings Conference Call on March 28, 2023.

5. Attached hereto as **Exhibit 4** is a true and correct copy of excerpts from Micron's Form 10-K for the fiscal year ended August 31, 2023, filed with the United States Securities Exchange Commission ("SEC") on October 6, 2023.

6. Attached hereto as **Exhibit 5** is a true and correct copy of excerpts from Micron's Form 10-K for the fiscal year ended August 29, 2024, filed with the SEC on October 4, 2024.

7. Attached hereto as **Exhibit 6** is a true and correct copy of Micron's Form 8-K, filed with the SEC on August 7, 2024.

8. Attached hereto as Composite **Exhibit 7** is a true and correct copy of excerpts from Micron's:

- (a) Form 10-Q for the third quarter of fiscal year 2022 (FQ3-22), filed with the SEC on July 1, 2022;
- (b) Form 10-Q for the first quarter of fiscal year 2023 (FQ1-23), filed with the SEC on December 22, 2022;
- (c) Form 10-Q for the second quarter of fiscal year 2023 (FQ2-23), filed with the SEC on March 29, 2023;
- (d) Form 10-Q for the third quarter of fiscal year 2023 (FQ3-23), filed with the SEC on June 29, 2023;
- (e) Form 10-Q for the first quarter of fiscal year 2024 (FQ1-24), filed with the SEC on December 21, 2023;
- (f) Form 10-Q for the second quarter of fiscal year 2024 (FQ2-24), filed with the SEC on March 21, 2024;
- (g) Form 10-Q for the third quarter of fiscal year 2024 (FQ3-24), filed with the SEC on June 27, 2024; and
- (h) Form 10-Q for the first quarter of fiscal year 2025 (FQ1-25), filed with the SEC on December 19, 2024.

9. Attached hereto as **Exhibit 8** is a true and correct copy of excerpts from Micron's Form 10-K for the fiscal year ended September 1, 2022, filed with the SEC on October 7, 2022.

10. Attached hereto as **Exhibit 9** is a true and correct copy of FactSet:callstreet Transcript of Micron's FQ4-23 Post Earnings Call on September 27, 2023.

11. Attached hereto as **Exhibit 10** is a true and correct copy of FactSet:callstreet Transcript of Micron's FQ2-24 Earnings Conference Call on March 20, 2024.

12. Attached hereto as **Exhibit 11** is a true and correct copy of FactSet:callstreet Transcript of Micron's FQ3-24 Earnings Conference Call on June 26, 2024.

13. Attached hereto as **Exhibit 12** is a true and correct copy of FactSet:callstreet Transcript of Micron's FQ4-24 Earnings Conference Call on September 25, 2024.

14. Attached hereto as **Exhibit 13** is a true and correct copy of FactSet:callstreet Transcript of Micron's FQ1-25 Earnings Conference Call on December 18, 2024.

15. Attached hereto as **Exhibit 14** is a true and correct copy of Micron's Press Release, Exhibit 99.1 to Form 8-K, filed with the SEC on December 18, 2024.

16. Attached hereto as **Exhibit 15** is a true and correct copy of a Stock Chart of Micron's historical stock prices from March 28, 2023 through July 8, 2025.

17. Attached hereto as **Exhibit 16** is a true and correct copy of Micron's Press Release, Exhibit 99.1 to Form 8-K, filed with the SEC on March 20, 2025.

18. Attached hereto as **Exhibit 17** is a true and correct copy of Micron's Press Release, Exhibit 99.1 to Form 8-K, filed with the SEC on June 25, 2025.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 9th day of July, 2025, in Palo Alto, California.

/s/Betty C. Rowe
Betty C. Rowe

35378059_v2