

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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TAIWAN SEMICONDUCTOR MANUFACTURING COMPANY, LTD.,  
and GLOBALFOUNDRIES U.S. INC.,  
Petitioners,

v.

GODO KAISHA IP BRIDGE 1,  
Patent Owner.

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Case IPR2016-01376<sup>1</sup>

Patent 6,197,696 B1

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Before JUSTIN T. ARBES, MICHAEL J. FITZPATRICK, and  
JENNIFER MEYER CHAGNON, *Administrative Patent Judges*.

**PETITIONER'S REQUEST FOR ORAL ARGUMENT**

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<sup>1</sup> GlobalFoundries U.S. Inc.'s motion for joinder in IPR2017-00921 was granted.

Pursuant to 37 C.F.R. § 42.70(a) and in accordance with the Board's Scheduling Order dated January 18, 2017 (Paper 12), Petitioner Taiwan Semiconductor Manufacturing Company Limited ("TSMC") respectfully submits this Request for Oral Argument. The Board has currently scheduled the oral argument in IPR2016-01376, IPR2016-01377, IPR2016-01378, and IPR2016-01379 for September 12, 2017. Paper 12 at 6.

TSMC specifies the following issues to be argued during oral argument:

- Whether claims 10–15 of U.S. Patent No. 6,197,696 are entitled to the benefit of priority of Japanese Patent Application No. H10-079371;
- Whether the effective prior-art date of *Grill* under pre-AIA 35 U.S.C. § 102(e) is the filing date of its provisional parent application, U.S. Application Ser. No. 60/071,628;
- Whether claims 10–15 of U.S. Patent No. 6,197,696 are unpatentable under pre-AIA 35 U.S.C. § 103 as obvious over *Grill* in view of *Aoyama*;
- Whether claims 10 and 12 of U.S. Patent No. 6,197,696 are unpatentable under pre-AIA 35 U.S.C. § 103 as obvious over *Grill* in view of *Aoyama* and *Wetzel*;
- Any issues identified in Patent Owner's Request for Oral Hearing;
- Any issues raised in either party's Motions to Exclude; and

- Any other issues the Board deems necessary for issuing a final written decision.

Petitioner requests 60 minutes of argument time for the proposed hearing of consolidated IPR2016-01376, IPR2016-01377, IPR2016-01378, and IPR2016-01379. To the extent the Board schedules the hearing to last longer than 120 minutes, Petitioner requests half the length of the hearing be allocated to Petitioner to address these issues.

Finally, Petitioner requests that ten spaces be reserved at the oral hearing to accommodate its counsel and corporate representatives. Petitioner also requests that two attorneys at Petitioner's counsel's table be allowed to use computers at the hearing (in addition to the counsel making the argument using his or her computer to show the demonstratives), to avoid the need for the parties to bring entire paper copies of the record into the hearing room and to facilitate efficient answering of panel questions.

Dated: August 15, 2017

Respectfully submitted,

By: /Darren M. Jiron/  
Darren M. Jiron  
Reg. No. 45,777

***Lead Counsel for Petitioner***

**CERTIFICATE OF SERVICE**

Pursuant to 37 C.F.R. § 42.6(e), this is to certify that I caused to be served a true and correct copy of the **PETITIONER'S REQUEST FOR ORAL ARGUMENT** by electronic mail, this 15th day of August, 2017, on counsel of record for the Patent Owner as follows:

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Patent Owner has agreed to electronic service.

A true and correct copy of the **PETITIONER'S REQUEST FOR ORAL ARGUMENT** was also served on August 15, 2017, via email directed to counsel of record for Petitioner GlobalFoundries U.S. Inc. at the following:

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IPR2016-01376, IPR2017-00921

Patent No. 6,197,696

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Dated: August 15, 2017

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