

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

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

v.

GODO KAISHA IP BRIDGE 1,
Patent Owner.

Case IPR2016-01376¹

Patent 6,197,696 B1

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

JOINT LIST OF OBJECTIONS TO DEMONSTRATIVES

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

Petitioner objects to Patent Owner’s slides 9–20, 23, 36, and 38 because they falsely portray a factual dispute over the application of a claim construction as a dispute over the claim construction itself. Petitioner further objects to Patent Owner’s **slides 14, 17, 21–23, 36, 38, 41, and 51** because they misrepresent Dr. Smith’s testimony by using incomplete testimony, taking his testimony out of context, mischaracterizing it as inconsistent, and/or imputing false significance to it. Petitioner also objects to Patent Owner’s **slides 14–17, 22, 36, 38, 41, 43, 44, 51, and 57** because they present new arguments not presented in the Patent Owner’s Response, only in improperly argumentative “observations” regarding Dr. Smith’s cross-examination testimony.

Patent Owner maintains its scope objections (Pap. 36) and objects to the new arguments/cites in Petitioner’s slides: **5** (reliance on EX1039-EX1040 for this point), **18-25** (re shifting production burden; improper reliance on Reply to Prelim. Resp.), **86** (same), **147** (same), **36** (thickness of 355, 353; EX2040 57:22-59:19), **41** (EX1047 95:4-96:21), **45** (fourth bullet), **47** (bullet), **49** (reliance on EX1006, EX1011 for this point), **64** (bullet), **66** (second bullet on left and parenthetical in second bullet on right), **68** (three blue bullets), **75** (“No Thinning of Layer 68,” Figs. 6E-6F), **80** (assertion that layer 58 is “equivalent” to layer 45), **86** (right column—see 8/18/17 email to Board), **159-160** (entire slides), **162** (header), **165-166** (citation to references 51-56), **172** (entire slide), **178** (Smith Tr. 27:8-12).

Dated: September 8, 2017

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that this JOINT LIST OF OBJECTIONS TO DEMONSTRATIVES was served by filing this document through the Patent Trial and Appeal Board PTAB E2E, as well as providing a courtesy copy via e-mail to the following attorneys of record for the Petitioner listed below:

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