UNITED STATES PATENT AND TRADEMARK OFFICE
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BEFORE THE PATENT TRIAL AND APPEAL BOARD
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INTELLECTUAL VENTURES MANAGEMENT, LLC
Petitioner

v.

Patent of XILINX, INC.
Patent Owner

_____

Case IPR2012-00018
Patent 7,566,960
Title: INTERPOSING STRUCTURE

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PATENT OWNER'S RESPONSE

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INTRODUCTION

Patent Owner Xilinx, Inc. ("Xilinx") provides this response under 35 U.S.C.

§ 316(a)(8) and 37 C.F.R. § 42.220. Xilinx respectfully submits that the prior art

in Grounds 6-9 fails to teach each and every limitation of the claims and fails to

teach all of the elements arranged as in the claim. Accordingly, the claims are

patentable over the prior art and should be confirmed.

Concurrently with this filing, Xilinx files a separate Motion to Amend that

presents reasons why the proposed substitute claims are still further distinguished

from the prior art of record. Since the proposed substitute claims recite all of the

limitations of the original independent claims, the arguments presented in this

Response apply equally to the proposed substitute claims. Nevertheless, Xilinx

requests that the Board accept the proposed substitute claims only to the extent that

the Board determines that the original claims are invalid under Grounds 6-9.

I.   Overview of U.S. 7,566,960

U.S. Patent No. 7566960 to Robert O. Conn, assigned to Xilinx, Inc.,

describes various innovative structures for capacitive interposers (caposers) for use

with integrated circuits. The novel caposers described in the '960 patent are useful

in addressing the problem of excessive noise in the power leads of integrated

circuitry operating at high frequencies. Placing a caposer with an integrated circuit

die *inside* an encapsulating package, as described and claimed, minimizes the

length of wiring between the capacitive element and the integrated circuit. This, in turn, minimizes the parasitic inductance due to the wiring and allows the capacitor to more effectively provide transient power.

II. The initial construction of "inside" should be refined to clarify that "inside" means "within"

Xilinx objects to and asks for reconsideration of the Board's proposed interpretation of an "array of landing pads disposed on an inside surface of the integrated circuit package." The Board's initial analysis interprets this phrase "to mean that the integrated circuit package has at least two surfaces (one facing in and once facing out) and that the array of landing pads is located on the surface facing in." (Paper 13 at 11.)

The initial claim interpretation is overly broad and fails to capture the essential point that the "inside surface" is *inside* the integrated circuit package. For the reasons outlined more specifically below, further analysis of the claim interpretation is appropriate and leads to a conclusion that either no formal interpretation is necessary, or alternatively that "inside" means "within."

A. No construction is necessary for "an array of landing pads disposed on an inside surface of the integrated circuit package"

The Board's order stated that there is a "'heavy presumption' that a claim term carries its ordinary and customary meaning" (Paper 13 at 7). Xilinx submits that the evidence in this case does not overcome that presumption, and accordingly

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