

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

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Case IPR2012-00023  
Patent 7,994,609  
Title: SHIELDING FOR INTEGRATED CAPACITORS

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**DECLARATION OF RICHARD A. BLANCHARD, PH.D.**  
**UNDER 37 C.F.R. § 1.68**

I, Richard Blanchard, do hereby declare:

1. I am making this declaration at the request of Xilinx, Inc. in the matter of the *Inter Partes* Review of U.S. Patent No 7,994,609 (“the ’609 Patent”) to Quinn, initiated by petitioner Intellectual Ventures Management, LLC (IVM).

2. In the preparation of this declaration, I have studied:

(1) The Petition for Inter Parte Review (“Petition”), Paper 3;

- (2) The '609 Patent, IVM-1001;
- (3) The prosecution history of the '609 Patent, IVM-1003 – 1005;
- (4) U.S. Patent No. 6,737,698 (“Paul”), IVM-1006;
- (5) U.S. Patent No. 7,439,570 (“Anthony”), IVM-1007;
- (6) U.S. Patent No. 7,286,071 (“Hsueh”), IVM-1008;
- (7) U.S. Patent No. 6,903,918 (“Brennan”), IVM-1009;
- (8) U.S. Pub. No. 2008/0128857 (“Bi”), IVM1010;
- (9) U.S. Patent No. 7,238,981 (“Marotta”), IVM-1011;
- (10) Declaration of Morgan Johnson, IVM-1002; and
- (11) The Decision entered Feb. 12, 2013 (“Decision”), Paper 11.

**3.** In forming the opinions expressed below, I have considered:

- (1) The documents listed above,
- (2) The relevant legal standards, including the standard for obviousness provided in *KSR International Co. v. Teleflex, Inc.*, 550 U.S. 398 (2007) and any additional authoritative documents as cited in the body of this declaration, and
- (3) My knowledge and experience based upon my work in this area as described below.

4. I am familiar with and am a practitioner of the technology at issue and am aware of the state of the art at the time the application leading to the '609 Patent was filed. The earliest priority date is November 21, 2008. Based on the technologies disclosed in the '609 Patent, I believe that one of ordinary skill in the art would include someone who has a B.S. degree in Electrical Engineering or equivalent training, as well as 3-5 years of experience in the field of integrated circuit device design and layout and semiconductor fabrication technology . Unless otherwise stated, when I give my understanding and analysis below, it is consistent with the level of one of ordinary skill in these technologies at and around the filing date of the '609 patent.

5. I am a consultant for Thomson Reuters Expert Witness Services (formerly known as Silicon Valley Expert Witness Group), a consulting company specializing in expert witness litigation support and technology consulting. I also provide technical consulting services to the semiconductor and electronics industry through Blanchard Associates.

6. My academic credentials include both a Bachelor of Science Degree in Electrical Engineering (BSEE) and a Master of Science Degree in Electrical Engineering (MSEE) from the Massachusetts Institute of Technology in 1968 and 1970, respectively. I subsequently obtained a Ph.D.

in Electrical Engineering in 1982 from Stanford University.

7. My professional background and technical qualifications are stated above and are also reflected in my *Curriculum Vitae*, which is attached as XLNX-2007. I am being compensated at a rate of \$275.00 per hour, with reimbursement for actual expenses, for my work related to this Petition for *Inter Partes* Review. My compensation is not dependent on and in no way affects the substance of my statements in this Declaration.

8. I have worked or consulted for more than 40 years as an Electrical Engineer. My primary focus has been on the development, manufacture, operation, and use of devices and integrated circuits, the assembly of these devices and integrated circuits, products that use them, and their failures. My employment history following my graduation from MIT began at Fairchild Semiconductor in 1970. At Fairchild, my responsibilities included circuit and device design, process development, and product engineering in the Linear Integrated Circuits Department.

9. In 1974, I joined Foothill College as an Associate Professor in the Engineering & Technology Division. My responsibilities included developing a program in Semiconductor Technology as well as teaching other courses in the division. While at Foothill College, I co-founded two

companies, Cognition and Supertex, and later joined Supertex as a Vice President in 1978. At Supertex, I designed and developed discrete DMOS (double-diffused metal oxide semiconductor) transistors, as well as integrated circuits that contained DMOS transistors. At Supertex, I also supervised the in-house assembly area, which included responsibility for the associated manufacturing processes.

**10.** I left Suptertex to join Siliconix in 1982, where I soon became Vice President of Engineering, with the responsibility for directing all of the company's product design and development. At Siliconix, I directed and contributed to the development of both discrete transistors and integrated circuits, including aspects of their assembly.

**11.** In 1987, I joined IXYS Corporation as a Senior Vice President with the responsibility for organizing an integrated circuit department. At IXYS, I developed integrated circuits that contained DMOS devices or that interfaced to DMOS devices. My responsibilities included the design, assembly, and testing of these integrated circuits.

**12.** These duties continued until 1991, when I left IXYS to set up Blanchard Associates, a consulting firm specializing in semiconductor technology, including intellectual property. Soon thereafter, I was invited to

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