

Paper No. _____

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

INTELLECTUAL VENTURES MANAGEMENT, LLC
Petitioner

v.

XILINX, INC.
Patent Owner

Case IPR2012-00023
Patent 7,994,609
Issue Date: August 9, 2011
Title: SHIELDING FOR INTEGRATED CAPACITORS

Before Sally C. Medley, Karl D. Easthom, and Justin T. Arbes
Administrative Patent Judges

**PATENT OWNER'S FIRST MOTION TO AMEND
BY XILINX UNDER 37 C.F.R. § 42.121**

Xilinx provides this paper concurrently with its Response in the above-listed IPR. This paper includes the following:

- A proposed new claim listing is provided at page 2 of this paper.
- A discussion of the proposed changes is provided at page 11 of this paper.
- A description of the support for the proposed claims is provided at page 12 of this paper.
- A description of patentably distinct features for the proposed claims is provided at page 15 of this paper.

I. Claim Listing

Xilinx proposes the following listing of claims:

1-17 (Cancelled)

18. (Original) A capacitor in an integrated circuit ("IC") comprising:

a first plate formed in a first conductive layer of the IC;

a second plate formed in a substrate of the IC;

a gate dielectric layer disposed between the first plate and the second plate;

a shield plate formed in a second conductive layer of the IC having a perimeter electrically connected the second plate so as to form an electrical shield around the first plate; and

a plurality of contacts formed between the shield plate and the second plate;

wherein the shield plate has a gap through which an electrical contact to the first plate extends, and the shield plate, the plurality of contacts, and the second plate provide electrical shielding for the first plate.

19. (Original) The capacitor of claim 18 wherein the first conductive layer is a first poly layer, the substrate comprises silicon and second plate is formed in an N-well of the substrate and the shield plate is formed in a second poly layer of the IC.

20. (New, substitute for original claims 1 and 8) A capacitor in an integrated circuit ("IC") comprising:

a core capacitor portion having a first plurality of conductive elements electrically connected to and forming a first part of a first node of the capacitor formed in a first conductive layer of the IC and a second plurality of conductive elements electrically connected to and forming a first part of a second node of the capacitor formed in the first conductive layer, the first plurality of conductive elements alternating with the second plurality of conductive elements in the first conductive layer, and a third plurality of conductive elements electrically connected to and forming a second part of the first node formed in a second conductive layer adjacent to the first conductive layer, each of the conductive elements in the third plurality of conductive elements is adjacent to a conductive element electrically connected to and forming a third part of the first node, and at least portions of some of the second plurality of conductive elements overlying and vertically coupling to at least portions of some of the third plurality of conductive elements;

a shield capacitor portion having a fourth plurality of conductive elements formed in at least the first conductive layer of the IC, the second conductive layer of the IC, a third conductive layer of the IC, and a fourth conductive layer of the

IC, the first conductive layer and the second conductive layer each being between the third conductive layer and the fourth conductive layer, the shield capacitor portion being electrically connected to and forming a second part of the second node of the capacitor and surrounding the first plurality of conductive elements and the third plurality of conductive elements; and

a reference shield electrically connected to a reference node of the IC other than the second node of the capacitor, the shield capacitor portion being disposed between the reference shield and the core capacitor portion.

21. (New, substitute for original claim 2) A capacitor in an integrated circuit ("IC") comprising:

a core capacitor portion having a first plurality of conductive elements electrically connected to and forming a first part of a first node of the capacitor formed in a first conductive layer of the IC and a second plurality of conductive elements electrically connected to and forming a first part of a second node of the capacitor formed in the first conductive layer, the first plurality of conductive elements alternating with the second plurality of conductive elements in the first conductive layer, and a third plurality of conductive elements electrically connected to and forming a second part of the first node formed in a second conductive layer adjacent to the first conductive layer, at least portions of some of

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