

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

Issue Date: August 9, 2011

Title: SHIELDING FOR INTEGRATED CAPACITORS

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

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**PATENT OWNER'S REQUEST FOR ORAL ARGUMENT**

Patent Owner Xilinx, Inc. ("Xilinx") hereby requests the opportunity to have an oral argument at the Board pursuant to 37 CFR 42.70.

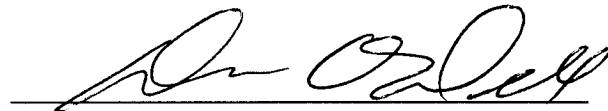
### **ISSUES TO BE ARGUED**

- I. Original claim 2 is patentable.
  - A. Claim 2 requires a shield capacitor portion made of polysilicon, which is not taught by Paul or the other cited prior art.
- II. Original claim 8 is patentable.
  - A. Claim 8 requires an unbalanced capacitor core portion, which is not taught by Paul or the other cited prior art.
- III. Original claim 18 is patentable.
  - A. Claim 18 requires a capacitor with a gate dielectric, which is not taught by the combination of references in the proposed rejection.
- IV. Original claim 19 is patentable.
  - A. Claim 19 requires two poly layers, which is not taught by the cited prior art.
- V. The Motion to Amend is Proper
  - A. No claims are broadened by the Motion to Amend, and all of the requirements of 37 CFR 42.121 are met.

In light of these remarks, Patent owner respectfully requests the opportunity to have an oral argument at the Board. If the Board has any questions, comments, or suggestions, the undersigned attorney earnestly requests a telephone conference.

No fees are believed to be required for filing this request; however, the Commissioner is authorized to charge any additional fees which may be required, or credit any overpayment, to the Deposit Account No. 08-1394.

Respectfully submitted,



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Attorney Docket No.: 42299.45

Dated: October 1, 2013

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**CERTIFICATE OF SERVICE**


The undersigned certifies, in accordance with 37 C.F.R. § 42.205, that service was made on the Petitioner as detailed below.

*Date of service* October 1, 2013

*Manner of service* Electronic Mail ([lgordon@skgf.com](mailto:lgordon@skgf.com); [rsterne@skgf.com](mailto:rsterne@skgf.com))

*Document served* Patent Owner's Request For Oral Argument

*Persons served* Sterne, Kessler, Goldstein & Fox P.L.L.C.  
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