

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

INTELLECTUAL VENTURES MANAGEMENT, LLC
Petitioner

v.

Patent of 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 PRESENTATION

Oral Hearing Before the
Patent Trial and Appeal Board

in

U.S. Patent No. 7,994,609

Case IPR2012-00023

Patent Owner's Presentation
November 7, 2013

IPR2012-00023

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.

Original Claim 2 (with base claim 1)

1. 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 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.
2. The capacitor of claim 1 wherein the third conductive layer is a metal layer of the IC and the fourth conductive layer is a poly layer of the IC, the shield capacitor portion including a first node shield plate formed in the metal layer from a plurality of metal stripes and a second node shield plate formed in the poly layer.

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