U.S. PATENT 7,147,759 Petition for *Inter Partes* Review

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UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

INTEL CORPORATION Petitioner

v.

Patent Owner of U.S. Patent No. 7,147,759 to Roman Chistyakov

IPR Trial No. <u>TBD</u>

PETITION FOR INTER PARTES REVIEW OF U.S. PATENT NO. 7,147,759 CHALLENGING CLAIMS 1, 4, 10-12, 17, 18 and 44 UNDER 35 U.S.C. § 312 AND 37 C.F.R. § 42.104



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B.	"multi-step ionization process"	17



VIII. Specific Grounds for Petition
A. Ground I: Claims 1, 10 and 18 are obvious in view of the combination of Mozgrin and Kudryavtsev
1. Independent claim 1
2. Dependent claim 10 is obvious in view of the combination of Mozgrin and Kudryavtsev
B. Ground II: Claims 4 and 44 are obvious in view of the combination of Mozgrin, Kudryavtsev, and the Mozgrin Thesis
C. Ground III: Dependent claims 10-12 are obvious in view of the combination of Mozgrin, Kudryavtsev and Li
D. Ground IV: Dependent claim 17 is obvious in view of the combination of Mozgrin, Kudryavtsev and Muller-Horsche39
E. Ground V: Claims 1, 4, 10 and 12 are obvious in view of the combination of Wang and Kudryavtsev
1. Independent claim 1
2. Dependent claims 4, 10 and 12 are obvious in view of the combination of Wang and Kudryavtsev
F. Ground VI: Dependent claim 11 is obvious in view of the combination of Wang, Kudryavtsev and Li52
G. Ground VII: Dependent claim 17 is obvious in view of the combination of Wang, Kudryavtsev and Muller-Horsche
H. Ground VIII: Dependent claim 18 is obvious in view of the combination of Wang, Kudryavtsev and Kobayashi
I. Ground IX: Dependent claim 44 is obvious in view of the combination of Wang, Kudryavtsev, and the Mozgrin Thesis
IX. Conclusion



TABLE OF AUTHORITIES

In re ICON Health & Fitness, Inc., 496 F.3d 1374, 1379 (Fed. Cir. 2007).

37 C.F.R. §42.22(a)(1)

37 C.F.R. § 42.100(b)

37 C.F.R. §42.104(a)

37 C.F.R. §42.104(b)(1)-(5)

77 Fed. Reg. 48764 (Aug. 14, 2012).



I. MANDATORY NOTICES

A. Real Party-in-Interest

Intel Corporation ("Petitioner") is the real party-in-interest.

B. Related Matters

There are currently several different litigation matters that would affect or be affected by a decision in the proceeding. Additionally, Petitioner is filing additional Petitions for *Inter Partes* review in several patents related to U.S. Patent No. 7,147,759 ("'759 Patent") (Ex. 1001). A complete list of the related litigations is submitted herewith as Exhibit 1034.

C. Counsel

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¹ The related patents, e.g., name the same alleged inventor.

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