

DOCKET NO.: 0107131-00275 US2

Filed on behalf of Intel Corporation

By: Richard Goldenberg, Reg. No. 38,895

David L. Cavanaugh, Reg. No. 36,476

Wilmer Cutler Pickering Hale and Dorr LLP

1875 Pennsylvania Ave., NW

Washington, DC 20006

Tel: (202) 663-6000

Email: Richard.Goldenberg@wilmerhale.com

David.Cavanaugh@wilmerhale.com

UNITED STATES PATENT AND TRADEMARK OFFICE

---

**BEFORE THE PATENT TRIAL AND APPEAL BOARD**

---

INTEL CORPORATION  
Petitioner

v.

Patent Owner of  
U.S. Patent No. 7,808,184 to Roman Chistyakov

IPR Trial No. TBD

**PETITION FOR *INTER PARTES* REVIEW OF  
U.S. PATENT NO. 7,808,184  
CHALLENGING CLAIMS 6-10 AND 16-20  
UNDER 35 U.S.C. § 312 AND 37 C.F.R. § 42.104**

**TABLE OF CONTENTS**

I.	Mandatory Notices.....	1
A.	Real Party-in-Interest.....	1
B.	Related Matters.....	1
C.	Counsel.....	1
D.	Service Information.....	1
II.	Certification of Grounds for Standing.....	2
III.	Overview of Challenge and Relief Requested.....	2
A.	Prior Art Patents and Printed Publications.....	2
B.	Grounds for Challenge.....	3
IV.	Brief Description of Technology.....	4
A.	Plasma.....	4
B.	Ions and Excited Atoms.....	5
V.	Overview of the ‘184 Patent.....	6
A.	Summary of Alleged Invention of the ‘184 Patent.....	6
B.	Prosecution History.....	7
VI.	Overview of the Primary Prior Art References.....	8
A.	Summary of the Prior Art.....	8
B.	Overview of Mozgrin.....	8
C.	Overview of Kudryavtsev.....	10
D.	Overview of Wang.....	11
VII.	Claim Construction.....	12
A.	“Strongly-ionized plasma” and “weakly-ionized plasma”.....	13
VIII.	Specific Ground For Petition.....	15
A.	Ground I: Claims 6-10 and 16-20 are obvious in view of the combination of Mozgrin and Kudryavtsev.....	15
1.	Independent claim 1.....	15
2.	Independent claim 11.....	27

3. Dependent claims 6-10 and 16-20 are obvious in view of the combination of Mozgrin and Kudryavtsev .....	30
B. Ground II: Claims 6-10 and 16-20 are obvious in view of the combination of Mozgrin and the Mozgrin Thesis .....	37
1. Independent Claim 1 .....	38
2. Independent claim 11 .....	41
3. Dependent claims 6-10 and 16-20.....	42
C. Ground III: Claims 6, 7, 9, 10, 16, 17, 19 and 20 are obvious in view of the combination of Wang and Kudryavtsev .....	43
1. Independent claim 1 .....	43
2. Independent claim 11 .....	52
3. Dependent claims 6, 7, 9, 10, 16, 17, 19, and 20 are obvious in view of the combination of Wang and Kudryavtsev .....	53
D. Ground IV: Claims 8 and 18 are obvious in view of the combination of Wang, Kudryavtsev and Mozgrin .....	56
IX. Conclusion .....	58

**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 also filing Petitions for *Inter Partes* review for several patents related<sup>1</sup> to U.S. Patent No. 7,808,184. A complete list of the related litigations is submitted herewith as Exhibit 1123.

**C. Counsel**

Lead Counsel: Richard Goldenberg (Registration No. 38,895)

Backup Counsel: David L. Cavanaugh (Registration No. 36,476)

**D. Service Information**

E-mail: David.Cavanaugh@wilmerhale.com;

Richard.Goldenberg@wilmerhale.com

Post and hand delivery: Wilmer, Cutler, Pickering, Hale and Dorr, LLP

1875 Pennsylvania Ave., NW

Washington, DC 20006

Telephone: 202-663-6000

Fax: 202-663-6363

---

<sup>1</sup> The related patents, e.g., name the same alleged inventor.

# Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

## Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

## Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

## Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

## API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

## LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

## FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

## E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.