#### UNITED STATES PATENT AND TRADEMARK OFFICE

## BEFORE THE PATENT TRIAL AND APPEAL BOARD

THE GILLETTE COMPANY, Petitioner,

v.

ZOND, LLC, Patent Owner

Patent 6,896,773

IPR Case Nos. IPR2014-00580 and 00726

### DECLARATION OF JOHN C. BRAVMAN PH.D. ON BEHALF OF PETITIONER

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III.	CLAIM CONSTRUCTION11			
	A.	"weakly-ionized plasma" and "strongly-ionized plasma"	.11	
	В.	"means for ionizing a feed gas to generate a weakly-ionized plasma (claim 40)		
	C.	"means for increasing the density of the weakly-ionized plasma" (claim 40)		
IV.		SPONSE TO PATENT OWNER'S ARGUMENTS REGARDING TH VIOUSNESS OF CLAIMS 1-40		
	D.	Independent Claims 1, 21, 34 and 40	.16	
	-	1. Feed gas	16	
	2. "an ionization source that generates a weakly-ionized plasma from a feed gas proximate to the anode and the cathode assembly" and "ionizing a feed gas to generate a weakly-ionized plasma proximate to a cathode assembly"			
	t S t	3. Combining Mozgrin with Fortov to choose an amplitude and a rise time of the voltage pulse to generate sufficient thermal energy in the sputtering target to cause a sputtering yield to be non-linearly related to temperature of the sputtering target would have been obvious to one skilled in the art		
		4. One skilled in the art would have been able to combine the cited references with reasonable expectation of success	26	
	E.	Dependent Claims 3-5, 10, 11, 13, 14, 18, 23-25, 28, 29, 35, 36 (and independent claim 34) would have been obvious		
		1. Dependent Claim 10	29	
	-	2. Dependent Claim 13	30	
		3. Dependent Claim 18	33	
	2	4. Dependent Claims 5 and 36	34	
	4	5. Dependent Claims 3, 4, 24, 25 and 35 (and independent claim 34)		
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6.	Dependent claim 28	.39
7.	Dependent claims 11 and 14	.40
8.	Dependent claim 23	.42
9.	Dependent claim 29	.43

I, John C. Bravman, declare as follows:

1. My name is John C. Bravman.

2. My academic training was at Stanford University, where I received my Bachelor of Science degree in Materials Science and Engineering in 1979, and a Master of Science degree in 1981, also in Materials Science and Engineering. I completed my Doctor of Philosophy degree in 1984, with a dissertation that focused on the nature of silicon – silicon dioxide interfaces as found in integrated circuit devices.

3. From 1979 to 1984, while a graduate student at Stanford, I was employed part-time by Fairchild Semiconductor in their Palo Alto Advanced Research Laboratory. I worked in the Materials Characterization group. In 1985, upon completion of my doctorate, I joined the faculty at Stanford as Assistant Professor of Materials Science and Engineering. I was promoted to Associate Professor with tenure in 1991, and achieved the rank of Professor in 1995. In 1997 I was named to the Bing Professorship.

4. At Stanford I was Chairman of the Department of Materials Science and Engineering from 1996 to 1999, and Director of the Center for Materials Research from 1998 to 1999. I served as Senior Associate Dean of the School of Engineering from 1992 to 2001 and the Vice Provost for Undergraduate Education from 1999 to 2010. On July 1, 2010, I retired from Stanford University and assumed the Presidency of Bucknell University, where I also became a Professor of Electrical Engineering.

5. I have worked for more than 25 years in the areas of thin film materials processing and analysis. Much of my work has involved materials for use in microelectronic interconnects and packaging, and in superconducting structures and systems. I have also led multiple development efforts of specialized equipment and methods for determining the microstructural and mechanical properties of materials and structures.

6. I have taught a wide variety of courses at the undergraduate and graduate level in materials science and engineering, emphasizing both basic science and applied technology, including coursework in the areas of integrated circuit materials and processing. More than two thousand students have taken my classes, and I have trained 24 doctoral students, most of whom now work in the microelectronics industry.

7. In the course of my research, my research group made extensive use of plasma deposition equipment for creating films of both simple (e.g. elemental) and complex (e.g. multi-element compound) materials, in both homogeneous and multilayered geometries.

8. I am a member of many professional societies, including the Materials Research Society, the Institute of Electrical and Electronic Engineers, and the

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