

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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FUJITSU SEMICONDUCTOR LIMITED,  
FUJITSU SEMICONDUCTOR AMERICA, INC.,  
ADVANCED MICRO DEVICES, INC., RENESAS ELECTRONICS  
CORPORATION, RENESAS ELECTRONICS AMERICA, INC.,  
GLOBALFOUNDRIES U.S., INC., GLOBALFOUNDRIES DRESDEN  
MODULE ONE LLC & CO. KG, GLOBALFOUNDRIES DRESDEN  
MODULE TWO LLC & CO. KG, TOSHIBA AMERICA ELECTRONIC  
COMPONENTS, INC., TOSHIBA AMERICA INC., TOSHIBA  
AMERICA INFORMATION SYSTEMS, INC.,  
TOSHIBA CORPORATION, and  
THE GILLETTE COMPANY,  
Petitioners,

v.

ZOND, LLC,  
Patent Owner

Patent 7,147,759 B2

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IPR Case Nos. IPR2014-00781, 00782, 01083, 01086, 01087<sup>1</sup>

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**DECLARATION OF LAWRENCE J. OVERZET PH.D.  
ON BEHALF OF PETITIONER**

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<sup>1</sup> Petitioners for IPR2014-01086 and IPR2014-01087 only include GLOBALFOUNDRIES U.S., Inc., GLOBALFOUNDRIES Dresden Module One LLC & Co. KG, GLOBALFOUNDRIES Dresden Module Two LLC & CO. KG, and the Gillette Company

Renesas Exhibit 1323  
IPR2014-00782

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I, Lawrence J. Overzet, declare as follows:

1. My name is Lawrence J. Overzet

2. I received my bachelors, masters, and Ph.D. in electrical engineering, all from the University of Illinois, College of Engineering, Urbana, IL. My doctoral thesis was titled “Enhancement of the Negative Ion Flux to Surfaces from Radio Frequency Processing Discharges.”

3. Since graduating in 1988, I have worked as a professor in the Department of Electrical Engineering at the University of Texas at Dallas. My courses include Introduction to Electromagnetic Fields I and II, and Plasma Processing Technology; Plasma Science for Materials Processing; and Current Topics in Plasma Processing.

4. I have over written over 75 articles, presented over 240 presentations at international symposia, and have 8 patents in various areas of electrical engineering, most of which being related to plasma science.

5. I am a senior member of the Institute of Electrical and Electronic Engineers (IEEE), and am a fellow of the American Vacuum Society (AVS) for my contributions toward understanding pulsed plasmas and the role of negative ions in plasma processing.

6. A copy of my resume is provided as Appendix A to this declaration.

7. I have reviewed the following publications in preparing this declaration:

- U.S. Patent No. 7,147,759 (the “759 Patent”) (Ex. 1001; 1101; 1201; 1301; 1401)).
- D.V. Mozgrin, *et al*, High-Current Low-Pressure Quasi-Stationary Discharge in a Magnetic Field: Experimental Research, Plasma Physics Reports, Vol. 21, No. 5, pp. 400-409, 1995 (“Mozgrin” (Ex. 1003; 1103; 1203; 1303; 1403)).
- A. A. Kudryavtsev *et al*, Ionization relaxation in a plasma produced by a pulsed inert-gas discharge, Sov. Phys. Tech. Phys. 28(1), pp. 30-35, January 1983 (“Kudryavtsev” (Ex. 1004; 1104; 1204; 1304; 1404)).
- U.S. Pat. No. 6,413,382 (“Wang” (Ex. 1005; 1105; 1205; 1305; 1405)), including U.S. Pat. No. 6,306,265 (“Fu” (Ex. 1023; 1223)) and U.S. Pat. No. 6,398,929 (“Chiang” (Ex. 2004)) which are both incorporated by reference by Wang.

- Li et al, J. Vac. Sci. Technol. A 18(5), pp. 2333-38, 2000 (“Li” (Ex. 1020; 1220)).
- European Pat. Publication EP 1113088 (“Yamaguchi” (Ex. 1222)).
- U.S. Pat. 5,257,531 (“Müller-Horsche” (Ex. 1021; 1123; 1221; 1329; 1422)).
- D.V. Mozgrin, High-Current Low-Pressure Quasi-Stationary Discharge in a Magnetic Field: Experimental Research, Thesis at Moscow Engineering Physics Institute, 1994 (“Mozgrin Thesis” (Ex. 1217)).
- I have read and understood each of the above publications and any other publication cited in this declaration. The disclosure of each of these publications provides sufficient information for someone to make and use the plasma generation and sputtering processes that are described in the above publications.

8. Also, I have reviewed papers in the *Inter Partes* Review Case Nos. IPR2014-00781, 00782, 01083, 01086, 01087, including the Petitions and the accompanying Declarations of Dr. Uwe Kortshagen. As discussed below, I agree with Dr. Kortshagen’s conclusions as stated in those Declarations. Further, I have reviewed the Board’s Institution Decisions, Patent Owner’s Responses, and the accompanying Declaration of Larry D. Hartsough, Ph.D.

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