

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

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

IPR2014-00818¹
Patent 6,853,142 B2

PETITIONER'S REPLY TO PATENT OWNER'S RESPONSE

¹ Cases IPR 2014-00866, IPR 2014-01012, and IPR 2014-01075 have been joined with the instant proceeding.

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II. CLAIM CONSTRUCTION 1

 A. “Weakly-Ionized Plasma” and “Strongly-Ionized Plasma” 1

III. RESPONSE TO ARGUMENTS 2

 A. Zond Improperly Confounds the Embodiments of Wang 2

 B. A person of ordinary skill in the art would have combined Wang and
 Lantsman..... 3

 C. Wang in view of Lantsman teaches “the feed gas diffusing the strongly-
 ionized plasma, thereby allowing additional power from the pulsed
 power supply to be absorbed by the strongly ionized plasma” recited in
 claim 1 and similarly in recited in claim 10. 5

 D. Wang in view of Lantsman teaches “an electrical pulse having a
 magnitude and a rise time that is sufficient to increase the density of the
 weakly-ionized plasma to generate a strongly-ionized plasma” recited
 in claim 1 and claim 10..... 8

 E. Wang in view of Lantsman teaches “selecting at least one of a pulse
 amplitude and a pulse width of the electrical pulse in order to cause the
 strongly-ionized plasma to be substantially uniform” recited in
 dependent claim 15..... 9

F. Wang in view of Lantsman teaches “the gas line supplies additional feed gas that exchanges the weakly-ionized plasma while applying the electrical pulse across” recited in claims 3 and 12..... 11

G. Wang in view of Lantsman teaches “the power supply generates a constant power” recited in claim 4 and “the power supply generates a constant voltage” recited in claim 5. 13

H. Wang in view of Lantsman teaches “the ionization source is chosen from the group comprising an electrode coupled to a DC power supply” recited in claim 6. 15

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TABLE OF AUTHORITIES

Cases

In re Mouttet, 686 F.3d 1322, 1332 (Fed. Cir. 2012)5

Rules

37 C.F.R. § 42.23 1

PETITIONER'S EXHIBIT LIST

April 16, 2015

Exhibit	Description
1001	U.S. Patent No. 6,853,142 (“’142 Patent”)
1002	Kortshagen Declaration (“Kortshagen Decl.”)
1003	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, 1995 (“Mozgrin”)
1004	U.S. Patent No. 6,190,512 (“Lantsman”)
1005	U.S. Pat. No. 6,413,382 (“Wang”)
1006	Plasma Etching: An Introduction, by Manos and Flamm, Academic Press (1989) (“Manos”)
1007	10/07/03 Office Action
1008	03/08/04 Response
1009	03/29/04 Allowance
1010	U.S. Patent No. 7,147,759 (“the ’759 patent”)
1011	05/02/06 Response from the ’759 patent file history
1012	The Materials Science of Thin Films, by Ohring M., Academic Press (1992) (“Ohring”)
1013	Thin-Film Deposition: Principles & Practice by Smith, D.L., McGraw Hill (1995) (“Smith”)
1014	04/21/08 Response in EP 1560943
1015	Claim Chart Based on Mozgrin and Lantsman used in 1:13-cv-11570-

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