

UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE PATENT TRIAL AND APPEAL BOARD

IPR2014-00818,819,821,827, and 1098
Patent 6,853,142

**PATENT OWNER ZOND LLC'S
DEMONSTRATIVE EXHIBIT**

OBVIOUSNESS

Claims 1-20, 40 And 42 Are Not Obvious Over Wang and Lantsman

❖ Wang and Lantsman would not have taught:

“a gas line that supplies feed gas to the strongly-ionized plasma, 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,” As Recited In Claim 1 And Similarly in Claims 10 and 40

OBVIOUSNESS

Claims 1-20 And 42 Are Not Obvious Over Wang Lantsman

- ❖ Lantsman makes no mention of generating a strongly ionized plasma and therefore, cannot possibly teach supplying feed gas to strongly-ionized plasma (Dr. Hartsough's Declaration, Ex 2005, ¶ 94).
- ❖ "Wang's chamber is a significantly different design than the '142 patent in that the feed gas in Wang enters by the wafer/pedestal electrode, far from the high density plasma region 42" (Dr. Hartsough's Declaration, Exhibit 2005, ¶ 94).

OBVIOUSNESS

Claims 1-20 And 42 Are Not Obvious Over Wang
Lantsman

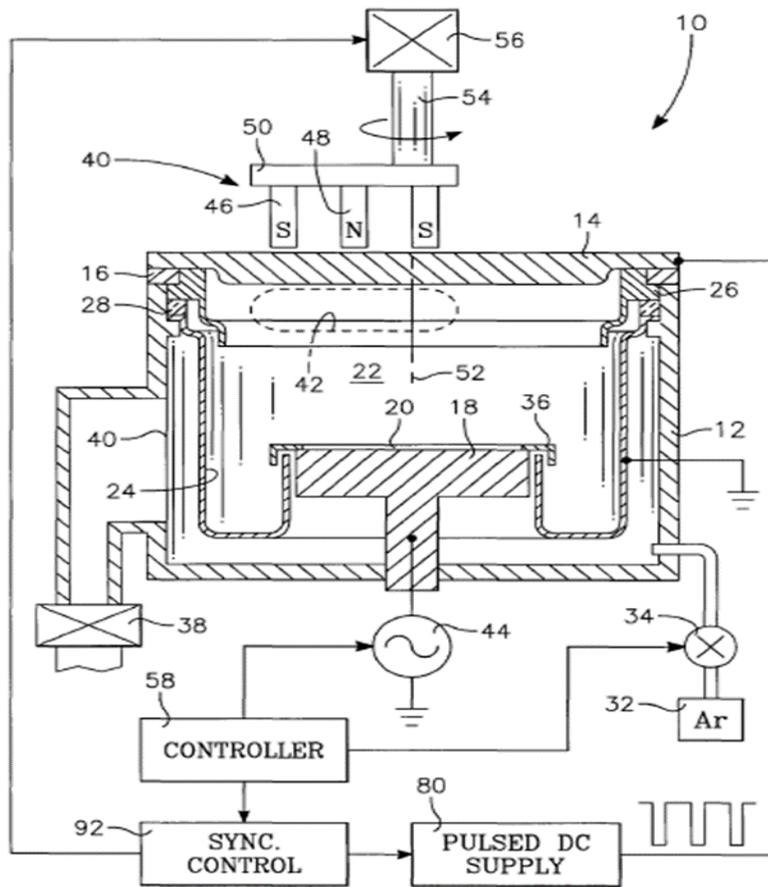


FIG. 1

OBVIOUSNESS

Claims 1-20 And 42 Are Not Obvious Over Wang Lantsman

- ❖ Wang, instead of teaching that the feed gas allows additional power from the pulsed power supply to be absorbed by the strongly ionized plasma as required by claims 1 and 10, discloses:

“a sputter working gas such as argon is supplied from a gas source 32 through a mass flow controller 34 to a processing region in back of the grounded shield 24. The gas flows into the processing region 22 through a gap formed between the pedestal 18, the grounded shield 24, and 10 a clamp ring or plasma focus ring 36 surrounding the periphery of the wafer 20” (col. 4, ll. 5-11)

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