

**EXHIBIT D.11**  
**U.S. Patent No. 6,853,142**

References cited herein:

- U.S. Pat. No. 6,853,142 (“’142 Patent”)
- U.S. Pat. No. 6,413,382 (“Wang”)
- U.S. Pat. No. 6,190,512 (“Lantsman”)
- A. A. Kudryavtsev, *et al*, Ionization relaxation in a plasma produced by a pulsed inert-gas discharge, Sov. Phys. Tech. Phys. 28(1), January 1983 (“Kudryavtsev”)

| ‘142 Claims 2 and 11   | Wang in view of Lantsman and Kudryavtsev  |
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| <p>[1pre.] An apparatus for generating a strongly-ionized plasma in a chamber, the apparatus comprising:</p>   | <p>The combination of Wang and Lantsman discloses an apparatus for generating a strongly-ionized plasma in a chamber.</p> <p>Wang at 7:19-25 (“Preferably, the peak power <math>P_P</math> is at least 10 times the background power <math>P_B</math>, more preferably at least 100 times, and most preferably 1000 times to achieve the greatest effect of the invention. A background power <math>P_B</math> of 1kW will typically be sufficient to support a plasma with the torpedo magnetron and a 200 mm wafer although with little if any actual sputter deposition.”)</p> <p>Wang at 7:31-39 (“In one mode of operating the reactor, during the background period, little or no target sputtering is expected. The SIP reactor is advantageous for a low-power, low-pressure background period since the small rotating SIP magnetron can maintain a plasma at lower power and lower pressure than can a larger stationary magnetron. However, it is possible to combine highly ionized sputtering during the pulses with significant neutral sputtering during the background period.”)</p> <p>Wang at 7:28-30 (“ the application of the high peak power <math>P_P</math> instead quickly causes the already existing plasma to spread and increases the density of the plasma”)</p> |
| <p>[1a.] an ionization source that generates a weakly-ionized plasma from a feed gas, the weakly-ionized plasma reducing the probability of developing an electrical breakdown condition in the chamber;</p> | <p>The combination of Wang and Lantsman discloses an ionization source that generates a weakly-ionized plasma from a feed gas, the weakly-ionized plasma reducing the probability of developing an electrical breakdown condition in the chamber.</p> <p>Wang at Fig. 7</p>   |

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|  | <p>Wang at 4:5-6 (“A sputter working gas such as argon is supplied from a gas source 32....”)</p> <p>Wang at 4:20-21 (“... a reactive gas, for example nitrogen is supplied to the processing space 22....”)</p> <p>Wang at 7:17-31 (“The background power level <math>P_B</math> is chosen to exceed the minimum power necessary to support a plasma... [T]he application of the high peak power <math>P_P</math> quickly causes the already existing plasma to spread and increases the density of the plasma.”)</p> <p>Wang at 7:19-25 (“Preferably, the peak power <math>P_P</math> is at least 10 times the background power <math>P_B</math> ... and most preferably 1000 times to achieve the greatest effect of the invention. A background power <math>P_B</math> of 1 kW [causes] little if any actual sputter deposition.”)</p> <p>Wang at 4:23-31 (“...thus creating a region 42 of a high-density plasma (HDP)...”)</p> <p>Wang at 7:3-49 (“Plasma ignition, particularly in plasma sputter reactors, has a tendency to generate particles during the initial arcing, which may dislodge large particles from the target or chamber... The initial plasma ignition needs be performed only once and at much lower power levels so that particulates produced by arcing are much reduced.”)</p> <p>Wang at 7:25-28 (“As a result, once the plasma has been ignited at the beginning of sputtering prior to the illustrated waveform, no more plasma ignition occurs.”).</p> <p>Wang at 7:58-61 (“... DC power supply 100 is connected to the target 14 ... and supplies an essentially constant negative voltage to the target 14 corresponding to the background power <math>P_B</math>.”)</p> <p>Wang at 7:22-23 (“A background power <math>P_B</math> of 1 kW will typically be sufficient to support a plasma...”)</p> |
| [1b.] a power supply that supplies power to the weakly-ionized plasma though an electrical pulse applied across the weakly-ionized | The combination of Wang and Lantsman discloses a power supply that supplies power to the weakly-ionized plasma though an electrical pulse applied across the weakly-ionized plasma, the electrical pulse having a  |

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| <p>plasma, the 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; and</p>  | <p>magnitude and a rise-time that is sufficient to increase the density of the weakly-ionized plasma to generate a strongly-ionized plasma.</p> <p>Wang at Fig. 7</p> <p>Wang at 7:61-62 (“The pulsed DC power supply 80 produces a train of negative voltage pulses.”)</p> <p>Wang at 7:19-25 (“Preferably, the peak power level <math>P_P</math> is at least 10 times the background power level <math>P_B</math>, ... most preferably 1000 times to achieve the greatest effects of the invention. A background power <math>P_B</math> of 1 kW will typically be sufficient...”)</p> <p>Wang at 7:28-30 (“... the application of the high peak power <math>P_P</math> instead quickly causes the already existing plasma to spread and increases the density of the plasma.”).</p> <p>Wang at 7:36-39 (“However, it is possible to combine highly ionized sputtering during the pulses with significant neutral sputtering during the background period.”)</p> <p>Wang at 5:23-27 (“[The pulse’s] exact shape depends on the design of the pulsed DC power supply 80, and significant rise times and fall times are expected.”)</p> <p><i>See</i> evidence cited in limitation [1pre] of claim 1.</p> |
| <p>[1c.] 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.</p> | <p>The combination of Wang and Lantsman discloses 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.</p> <p>Wang at Fig. 1</p> <p>Wang at 4:5-6 (“A sputter working gas such as argon is supplied from a gas source 32 through a mass flow controller 34 to a region in back of the grounded shield 24.”)</p> <p>Wang at 4:8-10 (“The gas flows into the processing region</p>  |

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|   | <p>22 through a gap formed between the pedestal 18, the grounded shield 24, and a clamp ring or plasma focus ring 36 surrounding the periphery of the wafer 20.”)</p> <p>Wang at 4:51-55 (“A computerized controller 58 controls the ... mass flow controller 34, as illustrated....”)</p> <p>Lantsman at 2:48-51 (“This secondary power supply ‘pre-ignites’ the plasma so that when the primary power supply is applied, the system smoothly transitions to final plasma development and deposition.”)</p> <p>One of ordinary skill would have been motivated to combine Wang and Lantsman. Lantsman is directed to sputtering using a plasma. So is Wang. <i>See</i> Wang at Title (“Pulsed sputtering with a small rotating magnetron”); 3:20-21 (“[A] high plasma density is achieved adjacent to the magnetron during the pulse.”). Also, Lantsman uses two power supplies, one for pre-ionization and one for deposition. So does Wang. <i>See</i> Wang at Fig. 7 [<i>showing pulsed supply 80 and constant supply 100</i>]</p> <p>Lantsman generates a plasma without arcing. So does Wang. Wang at 7:3-49 (“Plasma ignition, particularly in plasma sputter reactors, has a tendency to generate particles during the initial arcing, .... The initial plasma ignition needs be performed only once and at much lower power levels so that particulates produced by arcing are much reduced.”)</p> <p>Summarizing, Wang and Lantsman relate to the same application. Further, one of ordinary skill would have been motivated to use Lantsman’s continuous gas flow in Wang so as to maintain a desired pressure in the chamber. Also, use of Lantsman’s continuous gas flow in Wang would have worked well with Wang’s mass flow controller 34 and would have been a combination of old elements in which each element behaved as expected. Finally, such a continuous flow of gas in Wang would diffuse the strongly-ionized plasma and allow additional power to be absorbed by the plasma as required by claim 1.</p> |
| <p>2. The apparatus of claim 1 wherein the power supply applies</p> | <p>The combination of Wang, Lantsman, and Kudryavtsev disclose the power supply applies the electrical pulse</p>   |

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| <p>the electrical pulse across the weakly-ionized plasma to excite atoms in the weakly-ionized plasma and to generate secondary electrons, the secondary electrons ionizing the excited atoms, thereby creating the strongly-ionized plasma.</p> | <p>across the weakly-ionized plasma to excite atoms in the weakly-ionized plasma and to generate secondary electrons, the secondary electrons ionizing the excited atoms, thereby creating the strongly-ionized plasma.</p> <p><i>See evidence cited in claim 1</i></p> <p>‘142 Patent at 1:41-43 (“Magnetron sputtering systems use magnetic fields that are shaped to trap and to concentrate secondary electrons, which are produced by ion bombardment of the target surface.”)</p> <p>‘142 Patent at 1:37-40 (“The plasma is replenished by electron-ion pairs formed by the collision of neutral molecules with secondary electrons generated at the target surface.”)</p> <p>Wang at Fig. 7</p> <p>Wang at 7:61-62 (“The pulsed DC power supply 80 produces a train of negative voltage pulses.”)</p> <p>Wang at 7:19-25 (“Preferably, the peak power level <math>P_P</math> is at least 10 times the background power level <math>P_B</math>, ... most preferably 1000 times to achieve the greatest effects of the invention. A background power <math>P_B</math> of 1 kW will typically be sufficient...”)</p> <p>Wang at 7:36-39 (“However, it is possible to combine highly ionized sputtering during the pulses with significant neutral sputtering during the background period.”)</p> <p>Kudryavtsev at Figs. 1, 6</p> <p>Kudryavtsev at 34, right col, ¶ 4 (“[s]ince the effects studied in this work are characteristic of ionization whenever a field is suddenly applied to a weakly ionized gas, they must be allowed for when studying emission mechanisms in pulsed gas lasers, gas breakdown, laser sparks, etc.”)</p> <p>Kudryavtsev at 31, right col, ¶ 6 (“For nearly stationary <math>n_2</math> [excited atom density] values ... there is an explosive</p> |

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