

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,
Petitioner,

v.

ZOND, LLC,
Patent Owner

Patent 6,805,779 B2

IPR Case Nos. IPR2014-00828, 00829, 00917, 01073, 01076

**SUPPLEMENTAL DECLARATION OF
UWE KORTSHAGEN PH.D.
ON BEHALF OF PETITIONER**

TABLE OF CONTENTS

I. BACKGROUND3

II. RELEVANT LAW5

III. SUMMARY OF OPINIONS: CLAIMS 1-465

IV. CLAIM CONSTRUCTION7

 A. “excited atoms”7

 B. “metastable atoms”7

 C. “multi-step ionization process”7

 D. Means-Plus-Function Claim Elements.....8

V. RESPONSE TO PATENT OWNER’S ARGUMENTS REGARDING THE OBVIOUSNESS OF CLAIMS 1, 4-11, 13-16, 18-25, 27, 28, 30, 32-35, 37-42, 44, AND 45, AND ANTICIPATION OF CLAIMS 43 AND 469

 A. General Discussion.....9

 1. Iwamura Generates Excited and Metastable Atoms9

 2. Pinsley’s and Angelbeck’s Magnetic Fields’ Substantially Traps Electrons18

 3. Applying the Magnetic Field Teachings of Pinsley and Angelbeck to Iwamura.....33

 B. Independent Claims 1, 18, 30, 40, and 4139

 1. Iwamura Generates Excited and Metastable Atoms39

 2. Iwamura’s Preexcitation Unit and Plasma Generation Unit are coupled to the plasma chamber.....42

 3. Iwamura with Pinsley and Angelbeck Teach Generating a Magnetic Field to Substantially Trap Electrons Proximate to Ground State Atoms43

 4. Iwamura Generates a Plasma With a Multi-Step Ionization Process .48

 C. Independent Claim 43 and Dependent Claims 8 and 23: Pressure Differential Increasing Excitation Rate and Density of Excited Atoms52

 D. Independent Claim 44 and Dependent Claims 9 and 21: Inductively Coupled Discharge Source54

 E. Independent Claims 45-46 and Dependent Claims 16, 28, 38, and 42: Electron/Ion Absorber Trapping Electrons and Ions58

F.	Dependent Claims 4 and 32: Generating Metastable Atoms	62
G.	Dependent Claims 5 and 19: First and Second Electrodes Generating a Discharge	63
H.	Dependent Claims 6, 22, and 33: Magnetic Field Increasing Excitation Rate and Density of Excited Atoms	64
I.	Dependent Claims 7, 20, 34, and 39: Electron Beam Exciting Ground State Atoms	68
J.	Dependent Claims 10, 11, 24, and 25: Atom Source Positioned Inside/Outside the Plasma Chamber	71
K.	Dependent Claims 13-15, 27, 35, and 37: Ionizing Excited and Metastable Atoms	73

I, Uwe Kortshagen, declare as follows:

I. BACKGROUND

1. My name is Uwe Kortshagen.

2. My background is detailed in my declarations submitted with the original Petition for *Inter Partes* Review Case Nos. IPR2014-00828, 00829, 00917, 01073, and 01076.

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

- U.S. Patent No. 6,805,779 (the “779Patent”) (Exs. 1001, 1101, 1201, 1301, 1401)).
- 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” (Exs. 1004, 1104, 1204, 1304, 1404)).
- U.S. Patent No. 3,761,836 (“Pinsley” (Exs. 1005, 1105, 1205, 1305, 1405)).
- U.S. Patent No. 3,514,714 (“Angelbeck” (Exs. 1006, 1106, 1206, 1306, 1406)).
- U.S. Patent No. 5,753,886 (“Iwamura” (Exs. 1007, 1107, 1207, 1307, 1407)).
- EP 0146509 (“Gruber” (Ex. 1413)).
- WO 83/01349 (“Wells” (Exs. 1214, 1414)).

- R. F. Post, Proc. of Second U.N. Int'l. Conf. on the Peaceful Uses of Atomic Energy, Vol. 32 at p. 245 (Geneva, 1958) (“Post” (Exs. 1016, 1116, 1222, 1316, 1418)).

4. Also, I have reviewed papers in the *Inter Partes* Review Case Nos. IPR2014-00828, 00829, 00917, 01073, and 01076, including the Petitions and my accompanying Declarations. Further, I have reviewed the Board’s Institution Decisions, Patent Owner’s Responses, the accompanying Declaration of Larry D. Hartsough, Ph.D in support of Patent Owner’s Responses, and the deposition testimony of Dr. Hartsough given on April 7, 2015 in connection with Case Nos. IPR2014-00828 (Ex. 1223), 00829 (Ex. 1317), 00917 (Ex. 1419), 01073 (Ex. 1017), and 01076 (Ex. 1117).

5. I have read and understood each of the above publications and any other publication cited in this declaration. As I stated previously, 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.

6. I have considered certain issues from the perspective of a person of ordinary skill in the art as described below at the time the ’779 Patent application was filed. In my opinion, a person of ordinary skill in the art for the ’779 Patent would have found the ’779 Patent invalid.

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