

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

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IPR2014-00829<sup>1</sup>  
Patent 6,085,779 B2

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**PETITIONER'S REPLY TO PATENT OWNER'S RESPONSE**

**Claims 16, 28, 41, 42, 45 and 46**

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<sup>1</sup> Cases IPR2014-00828, IPR2014-00917, IPR2014-01073, and IPR2014-01076 have been joined with the instant proceeding.

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    B. Zond mischaracterizes the teachings of Pinsley and Angelbeck..... 3

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    C. Iwamura in view of Pinsley and Angelbeck teaches “a plasma chamber that is coupled to the [excited / metastable] atom source” recited in claims 1, and “a metastable atom source” recited in claim 18..... 16

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**Cases**

*EWP Corp. v. Reliance Universal, Inc.*, 755 F.2d 898, 907 (Fed. Cir. 1985) .....4

*In re Mouttet*, 686 F.3d 1322, 1332 (Fed. Cir. 2012) .....9

**PETITIONER'S EXHIBIT LIST**

April 27, 2015

Exhibit	Description
1301	U.S. Patent No. 6,805,779 ("779 Patent")
1302	Kortshagen Declaration ("Kortshagen Decl.")
1303	D.V. Mozgrin, <i>et al</i> , <u>High-Current Low-Pressure Quasi-Stationary Discharge in a Magnetic Field: Experimental Research</u> , Plasma Physics Reports, Vol. 21, No. 5, 1995 ("Mozgrin")
1304	A. A. Kudryavtsev and V.N. Skerbov, Ionization relaxation in a plasma produced by a pulsed inert-gas discharge, Sov. Phys. Tech. Phys. 28(1), pp. 30-35, January 1983 ("Kudryavtsev")
1305	U.S. Patent No. 3,761,836 ("Pinsley")
1306	U.S. Patent No. 3,514,714 ("Angelbeck")
1307	U.S. Patent No. 5,753,886 ("Iwamura")
1308	File History for U.S. Patent No. 6,805,779, Office Action dated February 11, 2004 ("02/11/04 Office Action")
1309	File History for U.S. Patent No. 6,805,779, Response dated May 6, 2004 ("05/06/04 Response")
1310	European Patent Application No. 1614136, Response dated July 24, 2007 (07/24/07 Response in EP 1614136)
1311	J. Vlček, A collisional-radiative model applicable to argon discharges over a wide range of conditions. I: Formulation and basic data, J. Phys. D: Appl. Phys. 22 (1989) pp. 623-631
1312	J. Vlček, A collisional-radiative model applicable to argon discharges over a wide range of conditions. II: Application to low-pressure, hollow-cathode arc and low-pressure glow discharges, J. Phys. D: Appl. Phys.

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