### References cited herein:

- U.S. Patent No. 7,808,184 ("'184 Patent")
- D.V. Mozgrin, *et al*, <u>High-Current Low-Pressure Quasi-Stationary Discharge in a Magnetic Field: Experimental Research</u>, Plasma Physics Reports, Vol. 21, No. 5, 1995 ("Mozgrin")
- A. A. Kudryavtsev, *et al*, <u>Ionization relaxation in a plasma produced by a pulsed inert-gas discharge</u>, Sov. Phys. Tech. Phys. 28(1), January 1983 ("Kudryavtsev")
- Leipold et al., <u>High-electron density</u>, <u>atmospheric pressure air glow discharges</u>, Power Modulator Symposium, 2002 and 2002 High-Voltage Workshop. Conference Record of the Twenty-Fifth International, June 2002 ("Leipold")
- Dennis M. Manos & Daniel L. Flamm, Plasma Etching: An Introduction, Academic Press 1989 ("Manos")
- Thornton, J.A., <u>Magnetron sputtering: basic physics and application to cylindrical magnetrons</u>, J. Vac. Sci. Technol. 15(2) 1978 ("Thornton")
- Gudmundsson et al., <u>Evolution of the electron energy distribution and plasma parameters in a pulsed magnetron discharge</u>, Applied Physics Letters, 78(22) May 2001 ("Gudmundsson")

Claims 1-2, 4-12, and	Mozgrin in view of Kudryavtsev
14-20	Wiozgrin in view of Rudi yavtsev
1. A method of generating a strongly-ionized plasma, the method comprising:	The combination of Mozgrin with Kudryavtsev discloses a method of generating a strongly-ionized plasma.
	'184 Patent at 7:14-17 ("[S]trongly-ionized plasmas are generally plasmas having plasma densities that are greater than about 10 <sup>12</sup> -10 <sup>13</sup> cm <sup>-3</sup> .")
	Mozgrin at 401, right col, $\P2$ ("For pre-ionization the initial plasma density in the $10^9 - 10^{11}$ cm <sup>-3</sup> range.")
	Mozgrin at 409, left col, ¶ 4 ("The implementation of the high-current magnetron discharge (regime 2) in sputtering plasma density (exceeding 2x10 <sup>13</sup> cm <sup>-3</sup> ).").
	Mozgrin at 409, left col, ¶5 ("The high-current diffuse discharge (regime 3) is useful for producing large-volume uniform dense plasmas $n_i \approx 1.5 \times 10^{15} \text{cm}^{-3}$ ").
a) supplying feed gas	The combination of Mozgrin with Kudryavtsev discloses supplying feed
proximate to an anode	gas proximate to an anode and a cathode assembly.



Claims 1-2, 4-12, and 14-20	Mozgrin in view of Kudryavtsev
and a cathode assembly; and	Mozgrin at Fig. 1
	Fig. 1. Discharge device configurations: (a) planar magnetron; (b) shaped-electrode configuration. (I) Cathode; (2) anode; (3) magnetic system.  Mozgrin at 401, left col, ¶ 4 ("the discharge gap which was filled up with either neutral or pre-ionized gas.").  Mozgrin at 400, right col, ¶ 3 ("We investigated the discharge regimes in various gas mixtures at 10 <sup>-3</sup> – 10 torr").  Mozgrin at 402, ¶ spanning left and right cols ("We studied the high-current discharge in wide ranges of discharge currentand operating pressureusing various gases (Ar, N <sub>2</sub> , SF <sub>6</sub> , and H <sub>2</sub> ) or their mixtures of various composition").  Mozgrin at 401, left col, ¶ 1 ("The [plasma] dischargewas adjacent to the cathode.")
b) generating a voltage pulse between the anode and the cathode assembly,	See also Mozgrin at Fig. 1.  The combination of Mozgrin with Kudryavtsev discloses generating a voltage pulse between the anode and the cathode assembly.  Mozgrin at Fig. 3(b):



Claims 1-2, 4-12, and	Mozgrin in view of Kudryavtsev
14-20	- tout
the voltage pulse having at least one of a controlled amplitude	Mozgrin at 402, Fig. 3 caption ("Fig. 3. Oscillograms of (a) current and (b) voltage").  Mozgrin at 401, left col, ¶ 4 ("It was possible to form the high-current quasi-stationary regime by applying a square voltage pulse to the discharge gap which was filled up with either neutral or pre-ionized gas.")  The combination of Mozgrin with Kudryavtsev discloses the voltage pulse having at least one of a controlled amplitude and a controlled rise
	time.
and a controlled rise time	Mozgrin at Fig. 3:
	(b) 1 2a 2b 3
	Mozgrin at 401, right col, ¶ 1 ("[t]he power supply was able to deliver square voltage and current pulses with [rise] times (leading edge) of $5 - 60 \mu s \dots$ ").
	Mozgrin at 406, right col, ¶ 2 ("Table 1 presents parameter ranges corresponding to regime 2.").
that in angages are	Mozgrin at 406, Table 1.
that increases an ionization rate so that	The combination of Mozgrin with Kudryavtsev discloses [at least one of a controlled amplitude and a controlled rise time] that increases an



Claims 1-2, 4-12, and	Mazanin in view of V-daytan-
14-20	Mozgrin in view of Kudryavtsev
a rapid increase in electron density and a formation of a strongly-ionized	ionization rate so that a rapid increase in electron density and a formation of a strongly-ionized plasma occurs without forming an arc between the anode and the cathode assembly.
plasma occurs	Mozgrin at Fig. 3
	Mozgrin at 401, right col, $\P2$ ("For pre-ionization the initial plasma density in the $10^9 - 10^{11}$ cm <sup>-3</sup> range.").
	Mozgrin at 409, left col, ¶ 4 ("The implementation of the high-current magnetron discharge (regime 2) in sputtering plasma density (exceeding 2x10 <sup>13</sup> cm <sup>-3</sup> ).").
	Mozgrin at 409, left col, ¶5 ("The high-current diffuse discharge (regime 3) is useful for producing large-volume uniform dense plasmas $n_i \cong 1.5 \times 10^{15} \text{cm}^{-3} \dots$ ").
	Mozgrin at Fig. 3
	Mozgrin at 401, ¶ spanning left and right columns ("The frequency parameters of the pulsed supply unit were chosen Designing the [pulsed supply] unit, we took into account the dependencies which had been obtained in [Kudryavtsev] of ionization relaxation on preionization parameters, pressure, and pulse voltage amplitude.").
	Kudryavtsev at 32, right col, ¶¶ 5-6 ("The discharge occurred inside a cylindrical tube The gas was preionized by applying a dc currentA voltage pulsewas applied to the tube.").
	Kudryavtsev at 31, right col, ¶ 6 (" an explosive increase in n <sub>e</sub> [electron density]. The subsequent increase in n <sub>e</sub> then reaches its maximum value, equal to the rate of excitation [equation omitted], which is several orders of magnitude greater than the ionization rate during the initial stage.")
	Kudryavtsev at Abstract (" electron density increases explosively in time due to accumulation of atoms in the lowest excited states.")
	It would have been obvious to adjust the operating parameters, e.g., increase the pulse length and/or pressure, so as to trigger Kudryavtsev's fast stage of ionization. One of ordinary skill would have been motivated to use Kudryavtsev's fast stage of ionization in Mozgrin so as to increase plasma density and thereby increase the sputtering rate. Kudravtsev's fast stage would also reduce the time required to reach a



Claims 1-2, 4-12, and	
14-20	Mozgrin in view of Kudryavtsev
	given plasma density in Mozgrin, thus reducing the time required for a sputtering process. Further, use of Kudryavtsev's fast stage in Mozgrin would have been a combination of old elements in which each element performed as expected to yield predictable results. Finally, because Mozgrin's pulse, or the pulse used in the combination of Mozgrin and Kudryavtsev, produced Kudryavtsev's "explosive increase" in plasma density, the rise time and amplitude of the pulse result in increasing the ionization rate so that a rapid increase in electron density and formation of a strongly-ionized plasma occurs.
	It would have been obvious to one of ordinary skill to combine Mozgrin with Kudryavtsev at least because Mozgrin cites Kudryavtsev and because Mozgrin explicitly notes that it was designed in accordance with Kudryavtsev. Mozgrin at 401, ¶ spanning left and right columns ("Designing the [pulsed supply] unit, we took into account the dependences which had been obtained in [Kudryavtsev]."). Also, Kudryavtsev states, "Since 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." Kudryavtsev at 34, right col, ¶ 4. Because Mozgrin applies voltage pulses that "suddenly generate an electric field," one of ordinary skill reading Mozgrin would have been motivated to consider Kudryavtsev to better understand the effects of applying Mozgrin's pulse and to confirm that Mozgrin's system used Kudryavtsev's fast stage of ionization. Further, use of Kudryavtsev's fast stage in Mozgrin would have been a combination of old elements in which each element performed as expected.
	Background:
	Leipold at Abstract ("Application of a high voltage pulse causes a shift in the electron energy distribution function to higher energies. This causes a temporary increase of the ionization rate and consequently an increase of the electron density.")
without forming an arc between the anode and the cathode	The combination of Mozgrin with Kudryavtsev discloses without forming an arc between the anode and the cathode assembly.
assembly.	Mozgrin at Fig. 7.
	Mozgrin at 400, left col, ¶ 3 ("Some experiments on magnetron systems of various geometry showed that discharge regimes which do not transit to arcs can be obtained even at high currents.")



# DOCKET

# Explore Litigation Insights



Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

# **Real-Time Litigation Alerts**



Keep your litigation team up-to-date with **real-time** alerts and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

## **Advanced Docket Research**



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

## **Analytics At Your Fingertips**



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

### API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

#### **LAW FIRMS**

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

#### **FINANCIAL INSTITUTIONS**

Litigation and bankruptcy checks for companies and debtors.

## **E-DISCOVERY AND LEGAL VENDORS**

Sync your system to PACER to automate legal marketing.

