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COMPONENTS, INC., TOSHIBA AMERICA INC., TOSHIBA
AMERICA INFORMATION SYSTEMS, INC.,
TOSHIBA CORPORATION, and
THE GILLETTE COMPANY,
Petitioners.

V.

ZOND, LLC, Patent Owner

IPR2014-00917<sup>1</sup> Patent 6,085779 B2

PETITIONER'S REPLY TO PATENT OWNER'S RESPONSE

Claims 7, 9, 20, 21, 38, and 44

<sup>&</sup>lt;sup>1</sup> Cases IPR2014-00828, IPR2014-00829, IPR2014-01073 and IPR2014-01076 have been joined with the instant proceeding.



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	C.	Iwamura in view of Pinsley and Angelbeck teaches "an energy source that is coupled to the volume of [excited / metastable] atoms thereby	



	generating a plasma with a multi-step ionization process" recited by claims 1, 18, and 44.	20
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## TABLE OF AUTHORITIES

## **Cases**

EWP Corp. v.	Reliance	Universal,	Inc.,	755 F.2d 898,	907 (Fed.	Cir. 1985)	4
In re Mouttet.	686 F.3d	1322, 1332	2 (Fed	L Cir. 2012)			9



## PETITIONER'S EXHIBIT LIST

April 27, 2015

Exhibit	Description
1401	U.S. Patent No. 6,805,779 ("'779 Patent")
1402	Declaration of Dr. Uwe Kortshagen ("Kortshagen Decl.")
1403	D.V. Mozgrin, <i>et al</i> , <u>High-Current Low-Pressure Quasi-Stationary</u> <u>Discharge in a Magnetic Field: Experimental Research</u> , Plasma Physics  Reports, Vol. 21, No. 5, pp. 400-409, 1995 ("Mozgrin")
1404	A. A. Kudryavtsev and V.N. Skerbov, <u>Ionization relaxation in a plasma</u> produced by a pulsed inert-gas discharge, Sov. Phys. Tech. Phys. 28(1), pp. 30-35, January 1983 ("Kudryavtsev")
1405	U.S. Patent No. 3,761,836 ("Pinsley")
1406	U.S. Patent No. 3,514,714 ("Angelbeck")
1407	U.S. Patent No. 5,753,886 ("Iwamura")
1408	File History for U.S. Patent No. 6,805,779, Office Action dated February 11, 2004 ("02/11/04 Office Action")
1409	File History for U.S. Patent No. 6,805,779, Response dated May 6, 2004 ("05/06/04 Response")
1410	European Patent Application No. 1614136, Response dated July 24, 2007 (07/24/07 Response in EP 1614136)
1411	J. Vlček, <u>A collisional-radiative model applicable to argon discharges</u> over a wide range of conditions. I: Formulation and basic data, J. Phys. D: Appl. Phys. 22 (1989) pp. 623-631, Printed in the UK
1412	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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