

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

TAIWAN SEMICONDUCTOR MANUFACTURING COMPANY, LTD.
(TSMC),
Petitioner

v.

DSS TECHNOLOGY MANAGEMENT, INC.
Patent Owner

Patent 5,652,084
IPR2014-01030

Title: METHOD FOR REDUCED PITCH LITHOGRAPHY

AFFIDAVIT OF ERICK HASEGAWA

I, Erick Hasegawa, do hereby declare:

1. I am an attorney with the law firm of Haynes and Boone, LLP. I am proficient in both Japanese and English. I have reviewed the documents submitted as Exhibits TSMC-1004 and TSMC-1011 in IPR2014-01030. Exhibit TSMC-1011 refers to the original, Japanese language version of JP04071222A (“Jinbo”); Exhibit TSMC-1004 refers to an English translation of Jinbo.

2. It is my belief that Exhibit TSMC-1004 is, to the best of my knowledge, a true and accurate translation of the original, Japanese language version of Jinbo provided in TSMC-1011.

3. I declare that all statements made herein on my own knowledge are true and that all statements made on information and belief are believed to be true, and further, that these statements were made with the knowledge that willful false statements and the like so made are punishable by fine or imprisonment, or both, under Section 1001 or Title 18 of the United States Code.

February 2, 2015

Date



Erick Hasegawa