

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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

v.

DSS TECHNOLOGY MANAGEMENT, INC.  
Patent Owner

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Patent 5,652,084  
IPR2014-01030

Title: METHOD FOR REDUCED PITCH LITHOGRAPHY

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**MOTION FOR SUPPLEMENTAL INFORMATION**  
**UNDER 37 CFR § 42.123**

1. Petitioner Taiwan Semiconductor Manufacturing Company (“TSMC”) hereby motions to submit supplemental information in IPR2014-01030 pursuant to 37 CFR § 42.123(a). On a conference call between the parties dated Monday, February 02, 2015, the PTAB panel provided authorization for TSMC to file this motion. Furthermore it is noted that Patent Owner’s representative Mr. Lyvtvyn, who was on the conference call, indicated that he did not oppose the filing of this motion. The present motion seeks to submit Exhibit TSMC-1012, included herewith.

**I. The Present Motion Complies with the Rules**

2. The present motion complies with the requirements of 37 CFR § 42.123(a), as set forth below:

3. *37 CFR § 42.123(a)(1)*: The Board instituted the above-identified inter partes review in a Decision dated December 31, 2014. This motion is being filed within one month of the date the trial on which the present IPR was instituted.

4. *37 CFR § 42.123(a)(2)*: The institution Decision in the present IPR relies on Japanese patent document JP04071222A, referred to as “Jinbo,” as a primary reference for invalidating at least one claim. As such, Jinbo is relevant to a claim for which the trial has been instituted.

## II. The Requested Supplemental Information

5. As mentioned above, the present IPR refers to and relies on Japanese patent document JP04071222A (“Jinbo”) for invalidating at least one claim.

Exhibit TSMC-1011 refers to the original, Japanese language version of Jinbo, and Exhibit TSMC-1004 refers to an English translation of Jinbo.

6. The English translation of Jinbo, Exhibit TSMC-1004, includes a certification of translation of the Japanese language version Jinbo. P. 1. However, Petitioner TSMC recently noted that this certification of translation did not include some of the formalities of a declaration, as required under 37 CFR § 1.68.

Specifically, it did not include a statement that the declarant was warned 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.

7. Out of an abundance of caution, Petitioner presents the attached affidavit of Exhibit TSMC-1012 by a person who is fluent in both Japanese and English to declare that the translation is true and correct, and to satisfy all of the formalities of 37 CFR § 1.68. To be clear, the English translation of Jinbo as provided in originally filed Exhibit TSMC-1004 is not being changed.

## III. Conclusion

For the reasons set forth above, TSMC asks that the Board accept this motion. The undersigned further authorizes payment for any additional fees that

may be due in connection with this Petition to be charged to Deposit Account No.  
08-1394.

Respectfully submitted,

/David O'Dell/

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Dated: February 2, 2015

**TSMC'S UPDATED EXHIBIT LIST**

February 2, 2015

TSMC-1001	Cleeves, U.S. Patent No. 5,652,084
TSMC-1002	Prosecution History of U.S. Patent No. 5,652,084
TSMC-1003	Cleeves (II), U.S. Patent No. 5,710,061
TSMC-1004	Jinbo, Japanese Patent App. No. 04-71222 (English Translation with Certification)
TSMC-1005	Brownell, U.S. Patent No. 4,591,547
TSMC-1006	McColgin, U.S. Patent No. 4,931,351
TSMC-1007	Matthews, U.S. Patent No. 4,548,688
TSMC-1008	Cooper, U.S. Patent No. 5,158,910
TSMC-1009	Declaration of Richard Blanchard
TSMC-1010	Curriculum Vitae of Richard Blanchard
TSMC-1011	Jinbo, Japanese Patent App. No. 04-71222
TSMC-1012	Affidavit of Erick Hasegawa

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