

EXHIBIT

DSS-2007

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

TAIWAN SEMICONDUCTOR MANUFACTURING COMPANY, LTD. (TSMC) and
SAMSUNG ELECTRONICS CO., LTD (SAMSUNG),
Petitioners,

v.

DSS TECHNOLOGY MANAGEMENT, INC.
Patent Owner.

Case IPR2014-01030¹
Patent No. 5,625,084

DECLARATION OF DR. CHRIS A. MACK, PH.D.

¹ Case IPR2014-01493 has been joined with this proceeding.

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DECLARATION OF CHRIS A. MACK, PH.D.

I, Chris A. Mack, Ph.D., declare as follows:

I. INTRODUCTION

1. I am making this declaration at the request of DSS Technology Management, Inc. (“Patent Owner”) in the matter of the Inter Partes Review Case No. IPR2014-01030 of U.S. Patent No. 5,652,084 (the ‘084 Patent”).

2. I understand that the Patent Trial and Appeal Board (“the Board”) issued a decision (“Decision”) instituting trial with respect to claims 1-12, 15, and 16 of the ‘084 Patent on the following grounds:

(1) anticipation of claims 1-8, 12, 15, and 16 under 35 U.S.C. §102(b) based on Japanese Patent Application No. HEI 4[1992]-71222 (“Jinbo”) (TSMC-1004);

(2) obviousness of claim 9 under 35 U.S.C. §103(a) based on Jinbo in view of U.S. Patent No. 4,931,351 (“McColgin”) (TSMC-1006); and

(3) obviousness of claims 10 and 11 under 35 U.S.C. §103(a) based on Jinbo in view of U.S. Patent No. 4,548,688 (“Matthews”) (TSMC-1007).

II. QUALIFICATIONS

3. I received Bachelor of Science degrees in Physics, Chemistry, Electrical Engineering, and Chemical Engineering from Rose-Hulman Institute of Technology in 1982, a Master of Science degree in Electrical Engineering from the University of Maryland in 1989, and a Ph.D. in Chemical Engineering from the University of Texas at Austin in 1998.

4. In 1983, I joined the Microelectronics Research Laboratory of the National Security Agency and began work in optical lithography research.

5. During 1990-91, I was on assignment at SEMATECH working in the areas of deep-UV photoresist characterization and phase-shifting mask optimization, which are part of the process of photolithography for semiconductor fabrication.

6. In 1990, I founded FINLE Technologies, Inc. ("FINLE"). FINLE produced industry-standard lithography modeling and data analysis software that enabled semiconductor manufacturers to speed development of advanced lithography processes required to develop and produce integrated circuits with smaller geometries.

7. In January of 1992, I joined FINLE full time as President and Chief Technical Officer. At FINLE, I developed lithography modeling and data analysis software. Further, I provided consulting and training services to the semiconductor industry.

8. After KLA-Tencor Corp. acquired FINLE in February 2000, I served as Vice President of Lithography Technology for KLA-Tencor Corp. for five years.

9. Since 2005, I have pursued various intellectual interests—including researching, writing, and teaching lithography. I have taught numerous classes as an adjunct professor at the University of Texas at Austin, and I have taught as a visiting fellow at the University of Canterbury, in New Zealand.

10. My professional background and technical qualifications are stated above and are reflected in my curriculum vitae, which is attached as Exhibit A.

11. I have worked previously as an expert witness in several matters. Matters in which I have served as an expert witness are listed in my curriculum vitae, attached as Exhibit A.

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