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. 5,652,084

PATENT OWNER DSS TECHNOLOGY, INC.'S RESPONSE TO PETITION

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



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	B.	Summary of the '084 Patent
	C.	The '084 Patent requires two separate patterns
III.	D.	Jinbo Addresses the Same Problem but Describes a Different Technique
	A.	The Claims of the '084 Patent are Construed According to the Legal Principles Used by the District Courts
		1. Second pattern
		a. The specification of the '084 Patent reaffirms that the first and second patterns are two separate individual elements and cannot be one and the same
		b. The second pattern cannot be a duplicate of the first pattern
IV.		ITIONER HAS FAILED TO PROVE ANY OF THE CHALLENGED CLAIM OF 6 '084 PATENT ARE UNPATENTABLE
	A.	Challenge #1: Jinbo does not anticipate claims 1-8, 12, 15, and 16 of the '084 Patent
		a. Jinbo does not explicitly disclose a limitation of patterning the second imaging layer in accordance with a second pattern
		b. Jinbo does not inherently disclose a "second pattern" in accordance with which second resist layer is patterned
	B.	Challenge #2: Claim 9 cannot be found obvious based on Jinbo in view of McColgin because Jinbo does not disclose several material limitations of claim 1 from which
		claim 9 depends



	C.	C. Challenge #3: Claims 10 and 11 cannot be rendered obvious by Jinbo in view of Matthews because Jinbo does not disclose several material limitations of claim 1 from	
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