

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

GLOBAL FOUNDRIES U.S., INC., GLOBALFOUNDRIES DRESDEN
MODULE ONE LLC & CO. KG, GLOBALFOUNDRIES DRESDEN
MODULE TWO LLC & CO. KG, and
THE GILLETTE COMPANY

Petitioners

v.

ZOND, LLC
Patent Owner

Case IPR2014-01073¹
Patent 6,805,779

ZOND LLC'S PATENT OWNER RESPONSE

¹ Case IPR2014-001017 has been joined with the instant proceeding.

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4. The combination of Iwamura, Angelbeck and Pinsley does not teach “the plasma chamber confining a volume of excited atoms generated by the excited atom source” as recited in independent claim 1 and as similarly recited in independent claim 18.41

5. The combination of Iwamura, Angelbeck and Pinsley does not teach “an energy source that is coupled to the volume of excited atoms confined by the plasma chamber” as recited in independent claim 1 and as similarly recited in independent claim 18.41

6. The combination of Iwamura, Angelbeck, and Pinsley does not teach “the energy source raising an energy of excited atoms in the volume of excited atoms so that at least a portion of the excited atoms in the volume of excited atoms is ionized,” as recited in independent claim 1 and as similarly recited in independent claim 18.43

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IPR2014-01073
U.S. Patent No. 6,805,779

Exhibit List

Exhibit No.	Description
Ex. 2004	Transcript of deposition of Dr. Kortshagen, Petitioners' expert, for the '779 Patent, 1/16/2015.
Ex. 2005	Declaration of Dr. Hartsough, Patent Owner's expert.

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