

UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE PATENT TRIAL AND APPEAL BOARD

IPR2014-00828, 829, 1073, 917, and 1076
Patent 6,805,779

**PATENT OWNER ZOND LLC'S
DEMONSTRATIVE EXHIBIT**

SUMMARY OF ARGUMENT

Listing Of Claim
Limitations That Are
Not Taught or Disclosed
By the Prior Art

OBVIOUSNESS

Claims 1-42, 44, and 45 Are Not Obvious Over Iwamura, Angelbeck, and Pinsley

❖ Iwamura, Angelbeck, and Pinsley do not teach:

“generating a magnetic field proximate to a volume of ground state atoms to substantially trap electrons proximate to the volume of ground state atoms” as recited in independent claim 30, and as similarly recited in independent claim 40,

“generating a volume of metastable atoms from the volume of ground state atoms,” As Recited In Claim 30, And As Similarly Recited in Claim 40,

“raising an energy of the metastable atoms so that at least a portion of the volume of metastable atoms is ionized,” As Recited In Claim 30, and as similarly recited in claim 40,

“generating the volume of metastable atoms comprises generating a discharge that excites at least a portion of the ground state atoms to a volume of ground state atoms to a metastable state,” As Recited In Claim 32,

“generating the magnetic field proximate to the volume of ground state atoms increases excitation of at least a portion of the ground state atoms in the volume of ground state atoms to a metastable state,” as recited in claim 32

OBVIOUSNESS

Claims 1-42, 44, and 45 Are Not Obvious Over Iwamura, Angelbeck, and Pinsley

❖ Iwamura, Angelbeck, and Pinsley do not teach:

“the raising the energy of the metastable atoms comprises exposing the metastable atoms to an electric field,” as recited in claim 35, and as similarly recited in claim 37,

“generating the volume of metastable atoms comprises generating an electron beam that excites at least a portion of the ground state atoms in the volume of ground state atoms to a metastable state,” As Recited In Dependent Claim 38 And As Similarly Recited In Dependent Claim 39,

“an excited atom source that receives ground state atoms from the feed gas source ... the excited atom source generating excited atoms from the ground state atoms” As Recited in Claim 1 And As Similarly Recited In Independent Claim 18,

“the excited atom source comprising a magnet that generates a magnetic field substantially trapping electrons proximate to the ground state atoms” as recited in independent claim 1 and as similarly recited in independent claim 18

“a plasma chamber that is coupled to the excited atom source,” as recited in independent claim 1 and as similarly recited in independent claim 18,

“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

OBVIOUSNESS

Claims 1-42, 44 And 45 Are Not Obvious Over Iwamura, Angelbeck, and Pinsley

❖ Iwamura, Angelbeck, and Pinsley do 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,

“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,

“an electron/ion absorber that receives the excited atoms from the excited atom source, the electron/ion absorber trapping electrons and ions,” as recited in dependent claim 16, and as similarly recited in independent claims 28 and 42, “means for generating a volume of metastable atoms from the volume of ground state atoms,” As Recited in Independent Claim 41, And As Similarly Recited in Claim 46,

“means for generating a magnetic field proximate to a volume of ground state atoms to substantially trap electrons proximate to the volume of ground state atoms,” as recited in independent claim 41 and as similarly recited in independent claim 46.

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