

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

GLOBALFOUNDRIES 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

IPR2014-01100¹
Patent 7,604,716 B2

PETITIONER'S REPLY TO PATENT OWNER'S RESPONSE

¹ Case IPR2014-00973 has been joined with the instant proceeding.

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II. CLAIM CONSTRUCTION1

III. RESPONSE TO ARGUMENTS2

 A. Wang teaches transforming weakly-ionized plasma to a strongly-ionized plasma “without developing an electrical breakdown condition in the chamber” (Claim 1). 2

 B. A person of ordinary skill in the art would have found it obvious to combine Wang and Lantsman (Claims 12 and 13). 6

IV. CONCLUSION.....10

TABLE OF AUTHORITIES

CASES

In re Mouttet, 686 F.3d 1322, 1332 (Fed. Cir. 2012)6

KSR Int'l Co. v. Teleflex Inc., 550 U.S. 398, 420 (2007)7

REGULATIONS

37 C.F.R. § 42.231

PETITIONER'S EXHIBIT LIST

April 30, 2015

Exhibit	Description
1101	U.S. Patent No. 7,604,716 ("716 Patent")
1102	Kortshagen Declaration ("Kortshagen Decl.")
1103	D.V. Mozgrin, <i>et al</i> , <u>High-Current Low-Pressure Quasi-Stationary Discharge in a Magnetic Field: Experimental Research</u> , Plasma Physics Reports, Vol. 21, No. 5, pp. 400-409, 1995 ("Mozgrin")
1104	U.S. Pat. No. 6,413,382 ("Wang")
1105	US 6,190,512 ("Lantsman")
1106	U.S. Pat. No. 6,853,142 ("142 Patent")
1107	File History for U.S. Pat. No. 7,604,716, Office Action dated March 27, 2008 ("03/27/08 Office Action")
1108	File History for U.S. Pat. No. 7,604,716, Response dated September 24, 2008 ("09/24/08 Response")
1109	File History for U.S. Pat. No. 7,604,716, Notice of Allowance dated June 11, 2009 ("06/11/09 Allowance")
1110	European Patent Application 1560943, Response of April 21, 2008 ("04/21/08 Response in EP 1560943")
1111	U.S. Patent No. 7,147,759 ("759 Patent")
1112	File History for U.S. Pat. No. 7,147,759, Response dated May 2, 2006 ("05/02/06 Response of '759 Patent File History")
1113	Plasma Etching: An Introduction, by Manos and Flamm, Academic Press (1989) ("Manos")
1114	The Materials Science of Thin Films, by Ohring M., Academic Press (1992) ("Ohring")

1115	Thin-Film Deposition: Principles & Practice by Smith, D.L., McGraw Hill (1995) ("Smith")
1116	Claim Chart Based on Mozgrin as used in 1:13-cv-11570-RGS ("Claim Chart based on Mozgrin and Lantsman")
1117	Claim Chart Based on Wang as used in 1:13-cv-11570-RGS ("Claim Chart based on Wang and Lantsman")
1118	List of Related Litigations
1119	Affidavit of Brett C. Rismiller in Support of Petitioner's Motion for <i>Pro Hac Vice</i> Admission
1120	Supplemental Kortshagen Declaration ("Supp. Kortshagen Decl.")
1121	Deposition Transcript of Larry D. Hartsough Ph.D. for U.S. Patent No. 7,604,716 (IPRs 2014-00807, 2014-00808, 2014-01099, 2014-01100) dated April 8, 2015 ("716 Dep. Tr.")
1122	Deposition Transcript of Larry D. Hartsough Ph.D. for U.S. Patent No. 6,853,142 (IPRs 2014-00818, 2014-00819, 2014-00821, 2014-00827, 2014-01098) dated February 26, 2015 ("142 Dep. Tr.")
1123	Deposition Transcript of Larry D. Hartsough Ph.D. for U.S. Patent No. 8,125,155 (IPRs 2014-00477, 2014-00479) dated February 12, 2015 ("155 Dep. Tr.")
1124	Deposition Transcript of Larry D. Hartsough Ph.D. for U.S. Patent No. 7,808,184 (IPRs 2014-00803, 2014-00799) dated February 11, 2015 ("184 Dep. Tr.")

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