

DOCKET NO.: 34789.152

Filed on behalf of: Taiwan Semiconductor Manufacturing Company, Ltd.;  
TSMC North America Corp.;  
Fujitsu Semiconductor Limited; and  
Fujitsu Semiconductor America, Inc.

By: David L. McCombs, Reg. No. 32,271  
David M. O'Dell, Reg. No. 42,044

UNITED STATES PATENT AND TRADEMARK OFFICE

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**BEFORE THE PATENT TRIAL AND APPEAL BOARD**

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TAIWAN SEMICONDUCTOR MANUFACTURING COMPANY, LTD.  
TSMC NORTH AMERICA CORP.  
FUJITSU SEMICONDUCTOR LIMITED  
FUJITSU SEMICONDUCTOR AMERICA, INC.  
Petitioner

v.

Patent Owner of  
U.S. Patent No. 6,896,773 to Roman Chistyakov

IPR Trial No. IPR2014-\*\*\*

**PETITION FOR *INTER PARTES* REVIEW OF  
U.S. PATENT NO. 6,896,773  
UNDER 35 U.S.C. § 312 AND 37 C.F.R. § 42.104**

**TABLE OF CONTENTS**

I.	MANDATORY NOTICES.....	1
A.	Real Party-in-Interest.....	1
B.	Related Matters.....	1
C.	Counsel.....	1
D.	Service Information.....	1
II.	CERTIFICATION OF GROUNDS FOR STANDING.....	2
III.	OVERVIEW OF CHALLENGE AND RELIEF REQUESTED.....	2
A.	Prior Art Patents and Printed Publications.....	2
B.	Grounds for Challenge.....	4
V.	OVERVIEW OF THE ‘773 PATENT.....	5
A.	Overview of Sputtering.....	5
B.	Sputtering Yield.....	6
C.	Temperature Dependence of the Sputtering Yield.....	7
D.	Summary of Alleged Invention of the ‘773 Patent.....	7
E.	Prosecution History.....	8
F.	Summary of the prior art.....	9
G.	References Are Not Cumulative.....	9
H.	Overview of Mozgrin (Ex. 1002).....	9
I.	Overview of Wang (Ex. 1003).....	11
J.	Overview of Fortov (Ex. 1004).....	12
VI.	SPECIFIC GROUNDS FOR PETITION.....	13
A.	Ground I: Claims 1, 6, 8-20 and 36-39 would have been obvious over Mozgrin and Fortov.....	13
B.	Ground II: Claim 5 would have been obvious over Mozgrin, Fortov, and Kawamata.....	25
C.	Ground III: Claims 1, 6, 8-20 would have been obvious over Wang and Fortov.....	27
D.	Ground IV: Claim 5 would have been obvious over Wang, Fortov and Kawamata.....	39

E.	Ground V: Claims 3, 4 and 34-39 would have been obvious in view of Mozgrin, Fortov and Lantsman.....	41
F.	Ground VI: Claims 3, 4 and 34-39 would have been obvious in view of Wang, Fortov and Lantsman.....	45
G.	Ground VII: Claim 7 would have been obvious in view of Mozgrin, Kudryavtsev and Fortov .....	50
H.	Ground VIII: Claim 7 would have been obvious in view of Wang, Mozgrin, Kudryavtsev and Fortov.....	55
I.	Ground IX: Claim 2 would have been obvious in view of Mozgrin, Mozgrin Thesis, and Fortov as evidenced by Raiser .....	56
J.	Ground X: Claim 2 would have been obvious in view of Wang, Fortov and Fu as evidenced by Raizer .....	58
VII.	CONCLUSION.....	60

**TABLE OF AUTHORITIES**

*In re ICON Health & Fitness, Inc.*, 496 F.3d 1374, 1379 (Fed. Cir. 2007).

37 C.F.R. §42.22(a)(1)

37 C.F.R. § 42.100(b)

37 C.F.R. §42.104(a)

37 C.F.R. §42.104(b)(1)-(5)

77 Fed. Reg. 48764 (Aug. 14, 2012).

## **I. MANDATORY NOTICES**

### **A. Real Party-in-Interest**

Taiwan Semiconductor Manufacturing Company, Ltd.; TSMC North America Corp.; Fujitsu Semiconductor Limited; and Fujitsu Semiconductor America are the real parties-in-interest (“Petitioner”).

### **B. Related Matters**

The ‘773 patent is involved in the following related matters: *Zond, LLC v. Fujitsu Semiconductor Limited et al.*, Civ. No. 1-14-cv-12438 (MAD June 9, 2014); *TSMC Tech., Inc. et al v Zond LLC*, Civ. No. 1-14-cv-00721 (DED June 6, 2014); *Zond, Inc. v. The Gillette Co. and the Procter and Gamble Co.*, Civ. No. 1:13-CV. 11567-DJC (MAD, July 1, 2013); IPR2014-00726 filed May 2, 2014; and IPR2014-00580 filed April 4, 2014. The present petition is substantially identical to IPR2014-00580, and Petitioner plans to seek joinder therewith. Additionally, the Patent Owner is suing Petitioner and/or other parties under one or more of U.S. Patent Nos. 7,147,759; 6,896,775; 6,853,142; 7,604,716; 8,125,155; 7,811,421; 6,805,779; 7,808,184; 6,806,652, and 6,896,775 which have generally similar subject matter.

### **C. Counsel**

Lead Counsel: David L. McCombs (Registration No. 32,271)

Backup Counsel: David M. O’Dell (Registration No. 42,044)

### **D. Service Information**

E-mail: [david.mccombs.ipr@haynesboone.com](mailto:david.mccombs.ipr@haynesboone.com)

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