

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAMSUNG ELECTRONICS CO., LTD

Petitioner

v.

DSS TECHNOLOGY MANAGEMENT, INC.

Patent Owner

U.S. Patent No. 5,652,084

Title: METHOD FOR REDUCED PITCH LITHOGRAPHY

Inter Partes Review No. IPR2014-_____

**PETITION FOR INTER PARTES REVIEW OF
U.S. PATENT NO. 5,652,084
CHALLENGING CLAIMS 1-16**

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SAMSUNG'S EXHIBIT LIST

September 12, 2014

Samsung-1001	The 084 Patent, U.S. Patent No. 5,652,084
Samsung-1002	Prosecution History of U.S. Patent No. 5,652,084
Samsung-1003	IBM Technical Disclosure, volume 32, number 8A (January 1990) (Disclosure 1)
Samsung-1004	The 061 Patent, U.S. Patent No. 5,710,061
Samsung-1005	Jinbo, Japanese Patent App. No. 04-71222 (English Translation with Certification)
Samsung-1006	Hsue, U.S. Patent No. 5,667,940
Samsung-1007	McColgin, U.S. Patent No. 4,931,351
Samsung-1008	Matthews, U.S. Patent No. 4,548,688
Samsung-1009	Cooper, U.S. Patent No. 5,158,910
Samsung-1010	W.H.-L. Ma., Plasma Resist Image Stabilization Technique (PRIST), IEEE Electron Devices Meeting, 1980 International, vol. 26, pp. 574-76, 1980
Samsung-1011	Declaration of Bruce Smith
Samsung-1012	Curriculum Vitae of Bruce Smith
Samsung-1013	Jinbo, Japanese Patent App. No. 04-71222

I. INTRODUCTION

Pursuant to the provisions of 35 U.S.C. §§ 311-319, Petitioner Samsung Electronics Co., Ltd. (“Samsung”) hereby petitions the Patent Trial and Appeal Board to institute an *inter partes* review of claims 1-16 (all claims) of United States Patent No. 5,652,084 (“the 084 Patent,” Samsung-1001) that issued on July 29, 1997, to James M. Cleeves. According to USPTO records, the 084 Patent is currently assigned to DSS Technology Management, Inc. The 084 Patent is currently the subject of the petition for *inter partes* review by Taiwan Semiconductor Manufacturing Company, Ltd., IPR2014-01030 (“IPR-1030”), filed on June 24, 2014. This petition includes challenges based on the same primary reference as IPR-1030 (Japanese Patent Application No. HEI 4[1992]-71222 (“Jinbo”) (Samsung-1013) as well as challenges based on an additional primary reference (U.S. Patent No. 5,667,940 (“Hsue”)) (Samsung-1006).

II. MANDATORY NOTICES

A. Real Party-in-Interest

The real party in interest is Samsung.

B. Related Matters

As of the filing date of this petition and to the best knowledge of Samsung, the 084 Patent is involved in the following litigation: (1) Petition for *Inter Partes* Review by Taiwan Semiconductor Manufacturing Company, Ltd., IPR2014-

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