# 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. IPR2014-01493

CORRECTED 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.HL. 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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