UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAMSUNG ELECTRONICS CO., LTD, Petitioners,

v.

DSS TECHNOLOGY MANAGEMENT, INC., Patent Owner.

> Case: IPR2014-01493 U.S. Patent No. 5,652,084

PATENT OWNER DSS TECHNOLOGY MANAGEMENT, INC.'S PRELIMINARY RESPONSE PURSUANT TO 37 C.F.R. §42.107

TABLE OF CONTENTS

I.	INT	RODU	CTION	1	
II.	STATEMENT OF RELIEF REQUESTED				
III.	RELATED IPR PETITION				
IV.	OVI	ERVIE	W OF THE INVENTION CLAIMED IN THE '084 PATENT	3	
V.	CLAIM CONSTRUCTION				
	A. The Board Should Construe Claims of the '084 Patent According to the L Principles Used by the District Courts				
	B.	Petiti	oner Failed to Provide its Construction of Several Key Claim Terms	9	
		1.	Patterning	10	
		2.	First pattern	10	
		3.	First patterned layer	11	
		4.	Over	11	
		5.	Second pattern	12	
		6.	Second patterned layer	15	
	C.		t Owner's Proposed Construction in Response to the Construction Proposed	-	
		1.	Imaging layer, single patterned layer, disposable post, PRIST	16	
		2.	Stabilizing	16	
		3.	A second feature distinct from the first feature	17	
VI.	LIK	ELIHC	ER HAS FAILED TO PROVE THAT THERE IS A REASONABLE OOD THAT AT LEAST ONE CLAIM OF THE '084 PATENT IS ITABLE	22	
	A.		enge #1: there is no reasonable likelihood that Jinbo could anticipate claims 5, and 16 of the '084 Patent		

	1.	According to Jinbo, both imaging layers are patterned using the same mask, whereas claims 1 and 15 require that each imaging layer is patterned in accordance with its own pattern		
	2.	Jinbo does not disclose the second patterned layer having a second feature distinct from the first feature of the first patterned layer		
	3.	Jinbo cannot anticipate dependent claims 2-8, 12, and 16 at least because Jinbo does not anticipate independent claims 1 and 15		
B.	becaus	nge #2: Claim 9 cannot be found obvious based on Jinbo in view of McColgin e Jinbo does not disclose several material limitations of claim 1 from which 9 depends		
C.	Matthe	nge #3: Claims 10 and 11 cannot be found obvious based on Jinbo in view of ews because Jinbo does not disclose several material limitations of claim 1 from claims 10 and 11 depend		
D.	Cooper	Challenge #4: Claims 13 and 14 cannot be found obvious based on Jinbo in view of Cooper because Jinbo does not disclose several material limitations of claim 1 from which claims 13 and 14 depend		
E.		nge #5: There is no reasonable likelihood that Hsue could anticipate claims 1- 12, 15, and 16 of the '084 Patent		
	1.	Hsue does not disclose "forming a second imaging layer <i>over</i> the first patterned layer"		
	2.	Hsue does not disclose that the first and the second patterned layers are formed in accordance with (2) two separate patterns		
	3.	Hsue does not disclose the second patterned layer having a second feature distinct from the first feature of the first patterned layer		
	4.	Hsue cannot anticipate dependent claims 2-7, 10, 12, and 16 at least because Hsue does not anticipate independent claims 1 and 15		
F.		nge #6: Claim 8 cannot be found obvious based on Hsue in view of Jinbo e Hsue does not disclose all limitations of claim 1		
G.		nge #7: Claim 9 cannot be found obvious based on Hsue in view of McColgin e Hsue does not disclose all limitations of claim 1		

	H.	Challenge #8: Claims 10 and 11 cannot be found obvious based on Hsue in view of Matthews because Hsue does not disclose all limitations of claim 1		
	I.	Challenge #9: Claims 13 and 14 cannot be found obvious based on Hsue in view of Cooper because Hsue does not disclose all limitations of claim 1		
VII.	CON	ICLUSION	9	

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<i>Breville Pty Ltd. v. Storebound LLC</i> , 2013 WL 3153383 (N.D. Cal. 2013)	
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Innolux Corp. v. Semiconductor Energy Laboratory Co., LTD., IPR2013-00065, Decision at pg. 10 (Apr. 30, 2013)	8
<i>Toyota Motor Corp. v. Leroy G. Hagenbuch,</i> IPR2013-00483, Order at pg. 2 (Apr. 16, 2014)	9

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