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

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

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

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. 6,896,775 to Roman Chistyakov

IPR Trial No. TBD

**PETITION FOR *INTER PARTES* REVIEW OF
U.S. PATENT NO. 6,896,775
UNDER 35 U.S.C. § 312 AND 37 C.F.R. § 42.104**

TABLE OF CONTENTS

	Page
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
IV. Claim construction.....	4
V. Brief Description of Technology.....	5
VI. Overview of the ‘775 Patent.....	8
VII. Overview of the primary prior art references.....	9
A. Summary of the prior art.....	9
B. References Are Not Cumulative.....	9
C. Overview of Mozgrin (Ex. 1002).....	10
D. Overview of Wang (Ex. 1008).....	13
VIII. Specific Grounds for Petition.....	14
A. Ground 1: Claims 1-7, 9-26, 28, and 29, would have been obvious in view of Mozgrin, Kudryavtsev and Mozgrin Thesis.....	14
B. Ground 2: Claim 8 would have been obvious in view of Mozgrin, Kudryavtsev, Mozgrin Thesis, and Kouznetsov.....	34
C. Ground 3: Dependent claim 27 would have been obvious in view of Mozgrin, Kudryavtsev, Mozgrin Thesis and Li.....	35
D. Ground 4: Claims 1-7, 9-16, 18-26, 28, and 29 would have been obvious in view of Wang, Mozgrin, and Kudryavtsev.....	36
E. Ground 5: Claim 8 would have been obvious in view of Wang, Mozgrin, Kudryavtsev and Kouznetsov.....	57
F. Ground 6: Dependent claim 17 would have been obvious in view of Wang, Mozgrin, Kudryavtsev and Lantsman.....	58
G. Ground 7: Dependent claim 27 is obvious in view of Wang, Mozgrin, Kudryavtsev and Li.....	59
IX. Conclusion.....	60

TABLE OF AUTHORITIES

Page(s)

FEDERAL NO TABLE OF AUTHORITIES ENTRIES FOUND.FEDERAL STATUTES

§ 102(a) 4
§ 102(b) 3
§ 102(e) 3
§ 312 i
35 U.S.C. § 314(a) 4
35 U.S.C. §103 4

RULES

35 U.S.C. §102(b) 3
42.104(b)(1)-(2) 2
42.104(b)(4)-(5) 14
Rule 42.104(a) 2
Rules 42.22(a)(1) 2

REGULATIONS

37 C.F.R. § 42.100(b) 4
37 C.F.R. § 42.104 i
77 Fed. Reg. 48756, 48764 (Aug. 14, 2012) 5

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 ‘775 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); IPR2014-00578 filed April 4, 2014; and IPR2014-00604 filed April 10, 2014. The present petition is substantially identical to IPR2014-00578, 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 6,896,773 all of which have generally similar subject matter.

C. Counsel

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

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

D. Service Information

E-mail: david.odell.ipr@haynesboone.com
david.mccombs.ipr@haynesboone.com

Post and hand delivery: David M. O'Dell

Haynes and Boone, LLP
2323 Victory Avenue, Suite 700
Dallas, TX 75219

Telephone: 972-739-8635 Fax: 214-200-0853

Counsel agrees to service by email.

II. CERTIFICATION OF GROUNDS FOR STANDING

Petitioner certifies pursuant to Rule 42.104(a) that the patent for which review is sought is available for *inter partes* review and that Petitioner is not barred or estopped from requesting an *inter partes* review challenging the patent claims on the grounds identified in this Petition.

III. OVERVIEW OF CHALLENGE AND RELIEF REQUESTED

Pursuant to Rules 42.22(a)(1) and 42.104(b)(1)-(2), Petitioner challenges claims 1-29 of U.S. Patent No. 6,896,775 (the '775 Patent) (Ex. 1001).

A. Prior Art Patents and Printed Publications

The following references and others in the Table of Exhibits are pertinent to the grounds of unpatentability explained below:

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