Claim	Claim Element	Comments
1.	A laser driven light source comprising:	Representative infringing products from Petitioners incl YieldStar system and other products that incorporate su containing a laser-driven light source or Qioptiq's laser ("Qioptiq LS1"). On information and belief, ASML's Y and YieldStar T-250D ("YieldStar 250") include a laser source.
		YieldStar S-250D
		The YieldStar 250 is a tool used in the semiconductor v process. On information and belief, YieldStar 250 syste Qioptiq laser-driven light sources to enable "very precise overlay and focus measurements per field needed to cal corrections to be applied on the scanners." (<i>See</i> YieldS Brochure (Jan. 20, 2014) (Ex. 2052); YieldStar S-250D (Jan. 20, 2014) (Ex. 2053).)

Infringem	Infringement Claim Chart U.S. Patent No. 8,969,841 – ASML YieldStar-Qioptiq Laser-D		
Claim	Claim Element	Comments	
		On information and belief, RnD-ISAN developed a laser source for Qioptiq that was eventually incorporated into use in the ASML YieldStar system. (RnD-ISAN LLC, ' Plasma Broadband Light Source" at 6 ("RnD-ISAN") (E ASML's Customer Magazine, 2014 at 18 (Ex. 2005) ("[7] lamp used in the YieldStar 200C has been replaced with delivers substantially more light and improved illuminat characteristics.").)	
		RnD ISAN carried out a research work on request of ASML, which results a special technology yield Star	
		(RnD-ISAN at 6 (Ex. 2039) (incorporation of light sour and YieldStar system).)	
		The Qioptiq LS1 is a laser-driven light source. (RnD-IS (Ex. 2039) ("Laser Pumped Plasma Broadband Light So	

Г

Claim	Claim Element	Comments
		(RnD-ISAN at 2 (Ex. 2039) ("Schematic of a laser p
		broadband light source").)
	a sealed pressurized	The Qioptiq LS1 includes a sealed chamber containing g
	chamber having a gas at a	pressurized to greater than 10 atmospheres during opera
	pressure greater than 10	at 2 (Ex. 2039), element #6 ("Xe high pressure lamp");
	atmospheres during operation;	medium is Xenon at high (~20 atm) pressure.").)
	an ignition source for ionizing the gas within the chamber; and	The Qioptiq LS1 includes an RF ignition source for ioni the chamber. (RnD-ISAN at 2 (Ex. 2039), element #5 (unit").)
	an at least substantially	The Qioptiq LS1 includes a continuous wave laser that p
	continuous laser for	substantially continuous energy at 980 nm, within the ra
	providing energy within a	nm, to sustain a plasma within the chamber. (RnD-ISAN
	wavelength range from about 700 nm to 2000 nm	element #3 ("Diode laser with optical fiber output (980n ("Continuous wave laser beam is focused onto initial ga
	to the ionized gas to	volume sufficient to maintain plasma state.").)
	sustain a plasma within the	
	chamber to produce a	The sustained plasma produces plasma-generated light h

Claim	Claim Element	Comments
Claim	plasma-generated light	greater than 50 nm. (RnD-ISAN at 3 (Ex. 2039) ("Laser
	having wavelengths greater	broadband light source XWS emits light in 200-800nm i
	than 50 nm,	spectral brightness.").)
	the chamber further	The chamber of the Qioptiq LS1 includes a region of ma
	comprising a region of	transparent to a portion of the plasma-generated light an
	material that is transparent	plasma-generated light to exit the chamber. (RnD-ISAN
	to at least a portion of the	element #6 ("Xe high-pressure lamp," depicting light en
	plasma-generated light and	lamp); 4 (depicting light emitted from the lamp).)
	that allows said portion of	
	the plasma-generated light	
	to exit the chamber.	
2.	The laser driven light source	As discussed in detail above, representative infringing p
	of claim 1, comprising	Petitioners meet all of the limitations of claim 1.
	at least one optical element	The Qioptiq LS1 includes a laser light filter optical elem
	for modifying a property of	property of the laser energy provided to the ionized gas.
	the laser energy provided	also includes focusing optics that modify a property of the
	to the ionized gas.	provided to the ionized gas. (RnD-ISAN at 2 (Ex. 2039)
		("Laser light filter"); element #4 ("Focusing optics" also
		of laser).)
3.	The laser driven light source	As discussed in detail above, representative infringing p
	of claim 2 wherein	Petitioners meet all of the limitations of claim 2.
	the optical element is a	The Qioptiq LS1 includes focusing optics that focus the
	lens or mirror focusing the	region of the ionized gas. (RnD-ISAN at 2 (Ex. 2039), e
	laser energy into a region	("Focusing optics," also depicted in path of laser); 1 ("C

Infringement Claim Chart U.S. Patent No. 8,969,841 – ASML YieldStar-Qioptiq Laser-Di			
Claim	Claim Element	Comments	
	of the ionized gas.	laser beam is focused onto initial gas breakdown volume maintain plasma state.").)	
7.	The laser driven light source	As discussed in detail above, representative infringing p	
	of claim 1 wherein	Petitioners meet all of the limitations of claim 1.	
	the ignition source is	The Qioptiq LS1 includes an RF ignition source for ioni	
	selected from the group	the chamber. (RnD-ISAN at 2 (Ex. 2039), element #5 (
	consisting of electrodes, an	unit").)	
	ultraviolet ignition source,		
	a capacitive ignition		
	source, an inductive		
	ignition source, a flash		
	lamp, a pulsed laser, and a		
	pulsed lamp.		

DOCKET A L A R M



Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.