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SAMSUNG ELECTRONICS CO., LTD. Petitioner

v.

ELBRUS INTERNATIONAL LIMITED Patent Owner

U.S. Patent No. 6,366,130

DECLARATION OF DR. R. JACOB BAKER

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I, R. Jacob Baker, declare as follows:

I. INTRODUCTION

- 1. I have been retained by Samsung Electronics Co., Ltd. ("Petitioner") as an independent expert consultant in this proceeding before the United States Patent and Trademark Office. Although I am being compensated at my rate of \$450 per hour for the time I spend on this matter, no part of my compensation is dependent on the outcome of this proceeding, and I have no other interest in this proceeding.
- 2. I understand that this proceeding involves U.S. Patent No. 6,366,130 ("the '130 Patent") (Ex. 1001), the application for which was filed on February 17, 2000, as U.S. Patent Application No. 09/505,656, and issued on April 2, 2002. I also understand, as demonstrated by the face of the '130 Patent, that the '130 Patent purports to claim priority to February 17, 1999, the filing date of U.S. Provisional Application No. 60/120,531 ("the '531 provisional application").
- 3. I have been asked to consider whether certain references disclose or suggest the features recited in the claims of the '130 Patent. My opinions are set forth below.

II. QUALIFICATIONS

4. I serve as a Professor of Electrical and Computer Engineering at the University of Nevada, Las Vegas ("UNLV"). I have been teaching electrical

engineering at UNLV since 2012. Before this, I was a Professor of Electrical and Computer Engineering with Boise State University beginning in 2000. Before my position at Boise State University, I was an Associate Professor of Electrical Engineering between 1998 and 2000 and an Assistant Professor of Electrical Engineering between 1993 and 1998, both at the University of Idaho. I have been teaching electrical engineering since 1991. I received my Ph.D. in Electrical Engineering from the University of Nevada, Reno, in 1993. I also received a MS and BS in Electrical Engineering from UNLV in 1988 and 1986, respectively.

5. As further described in my CV, I am a licensed Professional Engineer in the State of Idaho and have more than 25 years of experience, including extensive experience in circuit design and manufacture of Dynamic Random Access Memory (DRAM) semiconductor integrated circuit chips and CMOS Image Sensors (CISs) at Micron in Boise, Idaho. I also spent considerable time working on the development of Flash memory while at Micron. My efforts resulted in more than a dozen Flash-memory related patents. Among many other experiences, I led the development of the delay-locked loop (DLL) in the late 1990s so that Micron DRAM products could transition to the DDR memory standard. I also provided technical assistance with Micron's acquisition of Photobit during 2001 and 2002. This assistance included help transition the manufacture of CIS products into Micron's DRAM process technology. I have worked as a

consultant at other companies designing memory chips, including Sun, Oracle, and Contour Semiconductor. I have worked at other companies designing CISs, including Aerius Photonics, Lockheed-Martin, and OmniVision.

- 6. I am the author of several books covering the area of integrated circuit design including: *DRAM Circuit Design: Fundamental and High-Speed Topics* (two editions), *CMOS Circuit Design, Layout, and Simulation* (three editions), and *CMOS Mixed-Signal Circuit Design* (two editions). I have authored, and/or co-authored, more than 100 papers and presentations in the areas of solid-state circuit design and packaging.
- 7. As a professor, I have been the main advisor to five Doctoral students and over 65 Masters students.
- 8. I am the named inventor on over 137 granted U.S. patents in integrated circuit design including flash memory, DRAM, and CMOS image sensors.
- 9. I have received numerous awards for my work, including the Frederick Emmons Terman (the "Father of Silicon Valley") Award. The Terman Award is bestowed annually upon an outstanding young electrical/computer engineering educator in recognition of the educator's contributions to the profession.

- 10. I have also received the IEEE Circuits and Systems Education Award (2011), the IEEE Power Electronics Best Paper Award (2000), and I am a Fellow of the IEEE for contributions to memory circuit design.
- 11. In addition, I have received the President's Research and Scholarship Award (2005), Honored Faculty Member recognition (2003), Outstanding Department of Electrical Engineering Faculty recognition (2001), all from Boise State University. I have also received the Tau Beta Pi Outstanding Electrical and Computer Engineering Professor Award the three years I have been at UNLV.
- 12. I have also given over 50 invited talks at conferences and universities in the areas of integrated circuit design including: AMD, Arizona State University, Beijing Jiaotong University, Carleton University, Carnegie Mellon, Columbia University, Dublin City University (Ireland), École Polytechnique de Montréal, Georgia Tech, Gonzaga University, Hong Kong University of Science and Technology, Indian Institute of Science (Bangalore, India), Instituto de Informatica (Brazil), Instituto Tecnológico y de Estudios Superiores de Monterrey, ITESM (Mexico), Iowa State University, Laval University, Lehigh University, Princeton University, Temple University, University of Alabama, University of Arkansas, University of Buenos Aires (Argentina), University of Illinois, Urbana-Champaign, Utah State University, University of Nevada, Las Vegas, University of Houston, University of Idaho, University of Nevada, Reno, University of Macau, University

of Toronto, University of Utah, Yonsei University (Seoul, Korea), University of Maryland, IEEE Electron Devices Conference (NVMTS), IEEE Workshop on Microelectronics and Electron Devices (WMED), the Franklin Institute, National Semiconductor, AMI semiconductor, Micron Technology, Rendition, Saintgits College (Kerala, India), Southern Methodist University, Sun Microsystems, Stanford University, ST Microelectronics (Delhi, India), Tower (Israel), Foveon, ICySSS keynote, and Xilinx.

13. Details of my professional and educational background, as well as a listing of other matters on which I have provided consulting and/or provided testimony as a technical expert, are provided in my Curriculum Vitae, attached as Appendix A to this Declaration.

III. SUMMARY OF OPINIONS

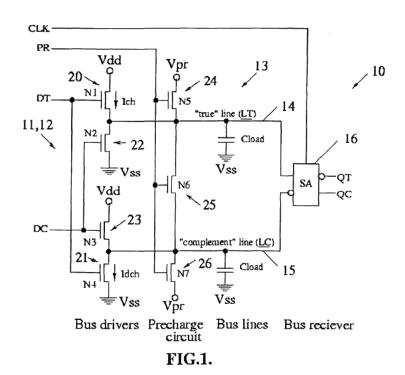
14. All of the opinions contained in this Declaration are based on the documents I reviewed, my experience and background, and my knowledge and professional judgment. In forming the opinions expressed in this Declaration, I reviewed the '130 Patent (Ex. 1001); the prosecution file history for the '130 Patent (Ex. 1003); the file history of the *inter partes* reexamination (control no. 95/000,657) ("the '657 proceeding") for the '130 Patent, excerpts of which I understand are being submitted as Ex. 1004; U.S. Patent No. 6,052,328 to Ternullo et al. ("*Ternullo*") (Ex. 1005); U.S. Patent No. 5,828,241 to Sukegawa

("Sukegawa") (Ex. 1006); U.S. Patent No. 6,249,469 to Hardee ("Hardee") (Ex. 1007); and excerpts from the Modern Dictionary of Electronics (7th ed. 1999) (Ex. 1008), while drawing on my experience and knowledge in the field.

- 15. My opinions have also been guided by my appreciation of how a person of ordinary skill in the art would have understood the claims of the '130 Patent at the time of the alleged invention, which I have been asked to initially assume is February 17, 1999, the filing date of the '531 provisional application from which the '130 Patent purports to claim priority. At the time of the alleged invention, a person of ordinary skill in the art related to the technology of the '130 Patent would have had an undergraduate degree in Electrical Engineering or equivalent and at least two to three years of experience in the design and/or analysis of data transfer circuits or the equivalent. In determining the level of ordinary skill, I was asked to consider, for example, the types of problems encountered in the art, prior solutions to those problems, the rapidity with which innovations are made, the sophistication of the technology, and the educational level of active workers in the field.
- 16. Based on my experience and expertise, it is my opinion that certain references disclose or suggest all the features recited in claims 1-3, 5-7, and 9 ("the challenged claims") of the '130 Patent.

IV. THE '130 PATENT

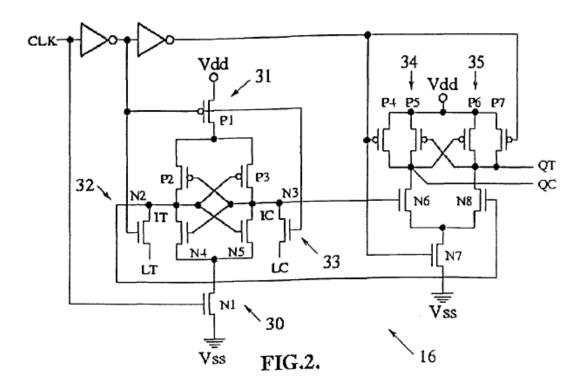
17. The '130 Patent is purportedly directed to a data transfer scheme that includes two bus drivers, a precharge circuit, two complementary bus lines, and a latching sense amplifier. *See, e.g.*, Ex. 1001 2:1-8. Figure 1 of the '130 Patent illustrates two bus drivers 11, 12 (consisting of transistors 20, 21, 22, and 23) and two complementary bus lines 14, 15 as inputs to a latching sense amplifier 16:



18. The data transfer scheme operates in two phases: a precharge phase and a data transfer phase (Ex. 1001 2:12-13), with the bus drivers and complementary bus lines operating in opposite phases to the latching sense amplifier (Ex. 1001 2:43-44). In other words, when the complementary bus lines

and the bus drivers are in the precharge phase, the sense amplifier is in data transfer phase and vice versa.

19. Figure 2 of the '130 Patent discloses a latching sense amplifier:



- 20. I understand that the '130 Patent includes 9 claims with claims 1 and 8 being independent and claims 2-7 and 9 being dependent from claim 1. I further understand that claim 9 was added during reexamination. As I note above, I was asked to opine with respect to some of the claims of the '130 Patent. I have reproduced claim 1 below:
 - 1. A data transfer arrangement comprising:

two bus drivers;

a voltage precharge source;

a differential bus coupled to the bus drivers and to the voltage precharge source; aid [sic]

a latching sense amplifier coupled to the differential bus;

wherein the latching sense amplifier comprises:

a first stage including a cross-coupled latch coupled to a differential data bus; and

an output stage coupled to an output of said first stage;

wherein the output of the first stage is coupled to an input of the output stage;

wherein the differential bus and the differential data bus are precharge to a voltage Vpr between Vdd and ground, where Vpr = K*Vdd, and K is a precharging voltage factor.

V. CLAIM CONSTRUCTION

21. I understand that a claim subject to *inter partes* review receives the broadest reasonable construction in light of the specification of the patent in which it appears. I also understand that in these proceedings, any term that is not construed should be given its plain and ordinary meaning under the broadest reasonable construction. I have followed these principles in my analysis. I discuss a few terms below and what I understand to be Petitioner's constructions of these terms.

A. Latching Sense Amplifier (Claims 1 and 3)

22. Independent claim 1 and dependent claim 3 of the '130 Patent recite a "latching sense amplifier." I understand Petitioner has offered that the broadest reasonable construction of the term "latching sense amplifier" that is consistent with the use of the term in the claims and specification of the '130 Patent is "a circuit, including a latch, that detects and amplifies signals." I have used this construction in my analysis and agree with it because the specification describes its latching sense amplifier to include a latch (see, e.g., Ex. 1001 2:39-40, 2:48-50) for detecting (see, e.g., Ex. 1001 2:33-38, 2:64-67) and amplifying received signals (see, e.g., Ex. 1001 2:64-67). Furthermore, latching sense amplifiers were well known at the time of the alleged invention of the '130 Patent, and this construction is consistent with the understanding of one of ordinary skill in the art at the time of the alleged invention of the '130 Patent as well as dictionary definitions for similar terms (see, e.g., Ex. 1008 at 679 (defining "sense amplifier" as "[a] circuit used to sense low-level voltages ... and to amplify these signals to the logic voltage levels of the system"). In my opinion, the claims additionally specify what a "latching sense amplifier" has to include. For example, claim 1 requires that the "latching sense amplifier" include both a first stage with a cross-coupled latch and an output stage. See, e.g., Ex. 1001 4:8-13.

B. Stage (Claims 1, 3, and 9)

23. Independent claim 1 and dependent claims 3 and 9 recite a "stage." I understand Petitioner has offered that the broadest reasonable construction of the term "stage" that is consistent with the use of the term in the claims of the '130 Patent is "portion of a circuit." I have used this construction in my analysis and agree with it. In my experience and in the field, the term "stage" is sometimes used to refer to a portion of a circuit. This construction is consistent with dictionary definitions for the term. See, e.g., Ex. 1008 at 728 (defining "stage" as "[a] single section of a multisection circuit or device"). This meaning is further reinforced by the claims. Claim 1 specifies that a latching sense amplifier comprises of a "first stage" and an "output stage," and claims 3 and 9 use the terms in the context of particular circuitry found within a "first stage" and an "output stage." See, e.g., Ex.1001 4:8-13, 4:21-23, Reexam Cert. 1:20-21. As the latching sense amplifier is itself a circuit, it follows accordingly that particular "stages" of the circuit reflect a portion of the circuit. My understanding is also consistent with the specification's use of the term "stage." Ex. 1001 3:4-5.

VI. THE PRIOR ART DISCLOSES OR SUGGESTS EVERY FEATURE OF THE CHALLENGED CLAIMS OF THE '130 PATENT

24. I have reviewed several references, discussed further below, that I understand are prior art to the '130 Patent. In my opinion, these references disclose or suggest all features of the challenged claims of the '130 Patent.

A. Brief Description of the Prior Art

- 25. Ternullo describes "a method and apparatus that accomplishes a high performance, random read/write SDRAM design by synchronizing the read and write operation at the data line sense amplifier." Ternullo Abstract. As such, Ternullo generally relates to the transmission of signals in an electronic circuit. Ternullo sought to overcome the challenges of using the same set of lines for efficient read and write operations (see, e.g., id. 2:9-35), and in doing so, teaches, among other things, a "high performance write process without impacting the critical read path" (id. 1:9-10).
- 26. Sukegawa describes "a type of signal transmission circuit wherein the signal is amplified and transmitted by means of the positive feedback of an intermediate amplifier circuit having input/output shared terminals." Sukegawa 1:11-15. The signal transmission circuit disclosed sought to increase the signal transmission distance as well as increase the speed and lower the power consumption of a transmission. Id. 4:52-55. Sukegawa discloses that its signal

transmission circuit comprises of "a driver circuit, a receiver circuit, an equalizer circuit, and an intermediate amplifier circuit." *Id.* 4:62-65. The intermediate amplifier circuit relies on positive feedback to amplify the signal provided by the driver circuit and transmit the amplified signal to the receiver circuit. *See, e.g., id.* 5:1-4.

- 27. *Hardee* is yet another prior art reference relating to signal transmission, and in particular, "integrated circuit memories" and "sense amplifiers for use therein." *See, e.g., Hardee* 1:8-10. *Hardee* introduces a sense amplifier highlighted by three "salient" features:
 - (1) the connection of each sense amplifier via transistors or other switching devices to the power supply lines without directly connecting together power supply lines for multiple sense amplifiers;
 - (2) the use of local read amplifiers;
 - (3) the use of local write circuitry.

See i.d. 5:24-32.

28. All the prior art references mentioned above relate to signal transmission and were motivated to improve the efficiency of such transmissions. As such, one of ordinary skill in the art at the time of the alleged invention of the

'130 Patent would have been motivated to combine the teachings of these references.

- B. Ternullo, Either Individually or in Combination with Other References, Discloses or Suggests Every Feature of the Challenged Claims of the '130 Patent
- 29. In my opinion, *Ternullo*, either individually or in combination with other references, such as *Hardee* and *Sukegawa*, discloses or suggests the features recited in the challenged claims of the '130 Patent.

1. Ternullo Discloses the Features of Claims 1-3 and 5-6

30. In my opinion and as shown in the charts below, *Ternullo* discloses each and every feature recited in claims 1-3 and 5-6 of the '130 Patent.

a. Claim 1

31. Ternullo discloses each and every feature of claim 1.

Claim Language	Ternullo
1. A data transfer	Ternullo discloses a data transfer arrangement.
arrangement	For example, Ternullo states that its "present invention
comprising:	provides a method and apparatus that accomplishes a high
	performance, random read/write SDRAM design by
	synchronizing the read and write operations at the data line
	sense amplifier." Ternullo Abstract.
	Ternullo further discloses that "[d]uring a read operation, read

Claim Language	Ternullo
	data is transferred from the memory cells of the device across
	a series of consecutive pairs of data lines to an input/output
	port of the memory device." Ternullo Abstract (emphasis
	added).
	Fig. 2 of Ternullo "shows a schematic diagram of the read
	circuitry 32A that is formed in accordance with the present
	invention as it may be implemented as part of the data sense
	line sense amplifier and supporting circuitry 32 (FIG. 1). The
	read circuitry 32A is required for performing a read
	operation." Ternullo 4:63-67.

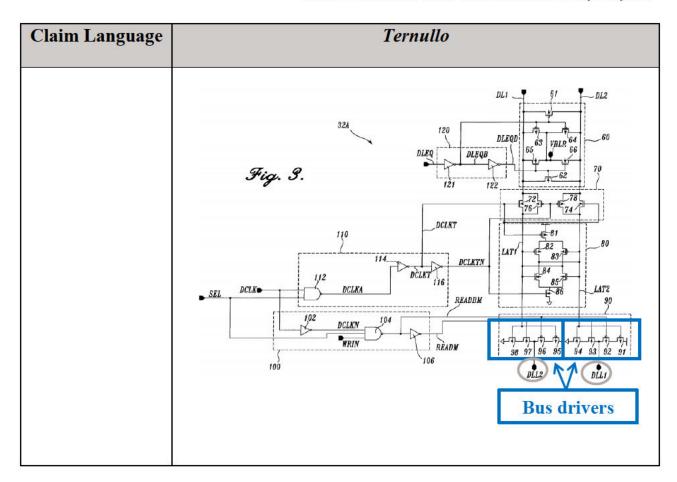
Claim Language	Ternullo
	32/
	DL1 DL2 DL2 DL2 DL2 DL2 DL2 DL2
	DCLK ISOLATION CIRCUIT -70 LATI - 80 AND BCLKT BATA LATCH LOCK BCCKTN LINE LATCH LOCK BCCKTN LATCH
	READ READ READ DRIVERS BLL2 DLL1
	Fig. 2.
	See also, e.g., Ternullo Fig. 1.
two bus drivers;	Ternullo discloses two bus drivers (e.g., transistor group 91-94
	and transistor group 95-98). See, e.g., Ternullo Fig. 3
	(annotated below).

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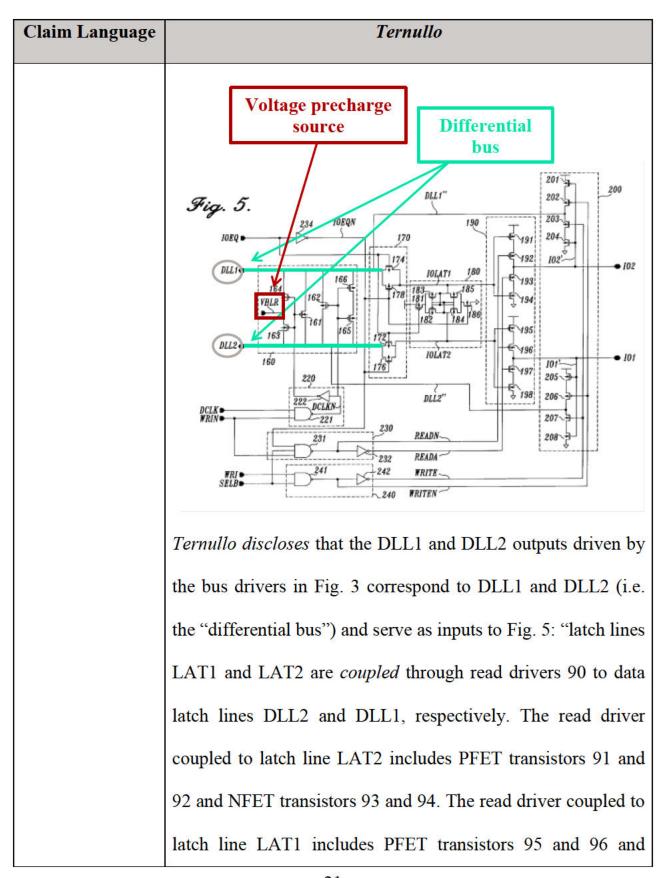
Claim Language	Ternullo
	#RIN 104 DLEQ DLEQD 65 VBLR 66 60 60 65 VBLR 66 60 60 65 VBLR 66 60 65 VBLR 66 60 65 VBLR 66 VBLR 66 65 VBLR 66 V
	Two bus drivers Ternullo discloses that "read driver coupled to latch line LAT2 includes PFET transistors 91 and 92 and NFET transistors 93 and 94. The read driver coupled to latch line LAT1 includes PFET transistors 95 and 96 and NFET transistors 97 and 98." Ternullo 7:15-18.
	The two bus drivers drive the outputs of Fig. 3 on lines DLL1 and DLL2. See, e.g., Ternullo 7:31-37 ("The read driver operates such that when the signal on the latch line LAT2 is low, PFET transistor 91 is biased on, and if the signal READBM is also low at that time, a high signal will be passed

Claim Language	Ternullo
	to the line DLL1. If the latch line LAT2 is high, then the
	NFET transistor 94 will be biased on, and if the signal
	READM is high, then a low signal will be passed to the line
	DLL1."); 7:18-22 ("While the connections and operation of
	the read driver connected to latch line LAT2 will be described
	below, it is understood that the read driver connected to latch
	line LAT1 is constructed and operates similarly.").
a voltage	Ternullo discloses a voltage precharge source (e.g., VBLR).
precharge source;	See, e.g., Ternullo Fig. 5 (annotated below).
	### 231 10
	VBLR represents a voltage precharge source because prior to

Claim Language	Ternullo
	receiving data on lines DLL1 and DLL2, these lines are
	precharged to the midlevel voltage VBLR: "when control
	signal DCLKD is high and signal DCLKN is low, NFET
	transistor 161 and PFET transistor 162 couple line DLL1 to
	line DLL2, while NFET transistors 163 and 164 and PFET
	transistors 165 and 166 couple the lines DLL1 and DLL2 to
	the midlevel voltage source VBLR." Ternullo 8:28-32; see
	also, e.g., id. 10:35-40.
a differential bus	Ternullo discloses a differential bus (e.g., DLL1 and DLL2)
coupled to the bus	coupled to the bus drivers (e.g., transistor group 91-94 and
drivers and to the	transistor group 95-98) and to the voltage precharge source
voltage precharge	(e.g., VBLR). See, e.g., Ternullo Figs. 3, 5 (annotated below).
source; aid [sic]	



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Claim Language	Ternullo
	NFET transistors 97 and 98." Ternullo 7:13-18 (emphasis
	added); see also id. Figs. 1-5. Thus, the bus drivers are coupled
	to the differential bus.
	Ternullo further discloses that "when control signal DCLKD is
	high and signal DCLKN is low, NFET transistor 161 and
	PFET transistor 162 couple line DLL1 to line DLL2, while
	NFET transistors 163 and 164 and PFET transistors 165 and
	166 couple the lines DLL1 and DLL2 to the midlevel voltage
	source VBLR." Ternullo 8:28-32 (emphasis added); see also,
	e.g., id. 10:35-40.
	One of ordinary skill in the art at the time of the alleged
	invention of the '130 Patent would have recognized DLL1 and
	DLL2 as the "differential bus" because a voltage differential
	(i.e., a difference in voltages between the two bus lines) can
	develop on these two bus lines. See, e.g., Ternullo 10:35-43. In
	addition, DLL1 and DLL2 precede isolation circuit170 within
	Ternullo's latching sense amplifier (discussed further below),
	and is consistent with the Patent Owner's own mapping of
	"differential bus" in the '657 proceeding:

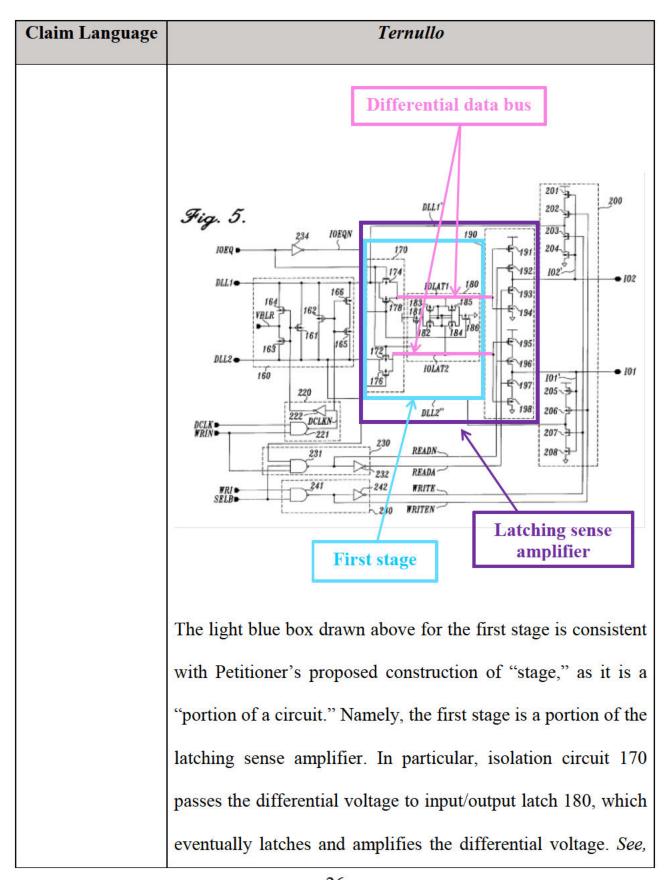
Claim Language	Ternullo
	Differential SA QT Vss Vpr Vss Bus drivers Precharge Bus lines Bus reciever circuit Ex. 1004, p. 68 (declaration of Dr. Philip Koopman submitted by Patent Owner; labeled differential bus LT and LC precedes sense amplifier 16).
a latching sense	Ternullo discloses a latching sense amplifier (shown in purple)
amplifier coupled	coupled to the differential bus DLL1 and DLL2. See, e.g.,
to the differential	Ternullo Fig. 5 (annotated below).
bus;	

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Claim Language	Ternullo
	The purple box drawn above for the latching sense amplifier is consistent with Petitioner's proposed construction of "latching sense amplifier," as it is a circuit, including a latch, that detects and amplifies signals. This circuit includes an input/output latch 180. The circuit detects and amplifies the signal on DLL1 and DLL2 received through isolation circuit 170. Ternullo 7:58-8:3, 8:51-55, 10:46-49.

Claim Language	Ternullo
	Ternullo discloses that "[w]hen NFET transistor 186 is biased
	on by a high on control signal IOEQN and when PFET
	transistor 181 is biased on by a low on control signal IOEQ,
	the input/output latch 180 is turned on. Once the input/output
	latch 180 is turned on, when a high or low signal appears on
	either of the lines IOLAT1 or IOLAT2, the other line IOLAT1
	or IOLAT2 is correspondingly driven to the opposite state by
	the function of the latch." Ternullo 8:48-55.
wherein the	Ternullo discloses a latching sense amplifier (shown in purple)
latching sense	wherein a first stage (shown in light blue) includes a cross-
amplifier	coupled latch (e.g., input/output latch 180) coupled to a
comprises: a first	differential data bus (e.g., IOLAT1 and IOLAT2). See, e.g.,
stage including a	Ternullo Fig. 5 (annotated below).
cross-coupled	
latch coupled to a	
differential data	
bus; and	

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Claim Language	Ternullo
	e.g., Ternullo 7:58-8:3, 8:48-55, 10:35-43.
	Ternullo discloses that "[w]hen NFET transistor 186 is biased
	on by a high on control signal IOEQN and when PFET
	transistor 181 is biased on by a low on control signal IOEQ,
	the input/output latch 180 is turned on. Once the input/output
	latch 180 is turned on, when a high or low signal appears on
	either of the lines IOLAT1 or IOLAT2, the other line IOLAT1
	or IOLAT2 is correspondingly driven to the opposite state by
	the function of the latch." Ternullo 8:48-55.
	Fig. 5 of Ternullo (annotated below) further teaches that the
	latch in Ternullo's first stage is cross coupled because the
	output of a first transistor is tied to the input of a second
	transistor, and vice versa:

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Claim Language	Ternullo
	183 185 186 182 184 186
	One of ordinary skill in the art at the time of the alleged
	invention of the '130 Patent would have understood that
	input/output latch 180 in Fig. 5 is mistakenly drawn
	incorrectly. The gates of the transistors are improperly
	connected to each other (the section of annotated Fig. 5 below
	covered by the green lines should be removed):

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Claim Language	Ternullo
	IOLAT1 180
	183
	Indeed, <i>Ternullo</i> teaches that "input/output latch operate[s] similarly to data line latch 80 in FIG. 2" (<i>Ternullo</i> 7:63-65), and data line latch 80, as further detailed in Fig. 3, is drawn correctly without the transistor gates connected to each other:

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Claim Language	Ternullo
	Gate of transistor 82 not connected to gate of transistor 83 LAT2 9
	Additionally, one of ordinary skill in the art at the time of the
	alleged invention of the '130 Patent would have recognized
	IOLAT1 and IOLAT2 as the "differential data bus" because it
	represents an amplified voltage differential representative of
	the data to be read out by the latching sense amplifier. See,
	e.g., Ternullo 8:45-55. Indeed, one of ordinary skill in the art
	at the time of the alleged invention of the '130 Patent would
	have understood IOLAT1 and IOLAT2 to include differential
	data because of the amplified voltage differential on these
	lines.
an output stage	Ternullo discloses a latching sense amplifier (shown in purple)

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Claim Language	Ternullo
coupled to an	wherein an output stage (e.g., read drivers 190, shown in
output of said	orange) is coupled to an output of the first stage (shown in
first stage;	light blue), and wherein the output of the first stage is coupled
wherein the	to an input of the output stage. See, e.g., Ternullo Fig. 5
output of the first	(annotated below).
stage is coupled	2017
to an input of the	Fig. 5.
output stage;	Delia 10EQ 170 190 191 102 102 102 102 102 102 102 102 102 102 102 102 102 103 104 104 105 104 105 1

Claim Language	Ternullo
	IOLAT1 180 193 194 194 195 195 196 Output of first stage coupled to input of output stage
	The orange box drawn in the first figure above for the output stage comprises read drivers 190 (<i>see, e.g., Ternullo</i> 8:56-67) and is consistent with Petitioner's proposed construction of "stage," as it is a "portion of a circuit." Namely, the output stage is a portion of the latching sense amplifier. In particular, the identified "output stage" performs the function of driving the output of <i>Ternullo</i> 's latching sense amplifier. <i>Ternullo</i> 8:7-

Claim Language	Ternullo
	10, 8:56-62 (stating that "[t] ristate read drivers 190 include
	two read drivers coupled to input/output latch lines IOLAT1
	and IOLAT2. The tristate read driver coupled to input/output
	latch line IOLAT1 includes PFET transistors 191 and 192 and
	NFET transistors 193 and 194, while the tristate read driver
	coupled to input/output latch line IOLAT2 includes PFET
	transistors 195 and 196 and NFET transistors 197 and 198")
	(emphasis added).
wherein the	Ternullo discloses that the differential bus (e.g., DLL1 and
differential bus	DLL2) and differential data bus (e.g., IOLAT1 and IOLAT2)
and the	are precharged to a voltage Vpr between Vdd and ground,
differential data	where Vpr = K*Vdd, and K is a precharging voltage factor.
bus are precharge	See, e.g., Ternullo Fig. 5 (annotated below). Specifically, the
to a voltage Vpr	differential bus is precharged to the midlevel voltage VBLR
between Vdd and	(i.e., a voltage between Vdd and ground) due to the precharge
ground, where	voltage source VBLR:
Vpr = K*Vdd,	
and K is a	
precharging	

Declaration of Dr. R. Jacob Baker Inter Partes Review of U.S. Patent 6,366,130

Claim Language	Ternullo
voltage factor.	### Differential bus Fig. 5.
	With respect to precharging the differential bus to an intermediate voltage Vpr between between ground and Vdd, <i>Ternullo</i> discloses that "FIG. 5 illustrates a practical implementation of the circuit of FIG. 4. As shown in FIG. 5, equalizing circuit 160 includes NFET transistors 161, 163, and 164, and PFET transistors 162, 165, and 166. Equalizing circuit 160 is constructed and operates similarly to equalizing

Claim Language	Ternullo
	circuit 60 of FIG. 2. Thus, when control signal DCLKD is high
	and signal DCLKN is low, NFET transistor 161 and PFET
	transistor 162 couple line DLL1 to line DLL2, while NFET
	transistors 163 and 164 and PFET transistors 165 and 166
	couple the lines DLL1 and DLL2 to the midlevel voltage
	source VBLR." Ternullo 8:23-33 (emphasis added).
	The differential data bus is also precharged as the intermediate
	precharge voltage applied to the differential bus (i.e., VBLR)
	is passed to the differential data bus through isolation circuit
	170. See, e.g., Ternullo 8:34-42 ("Isolation circuit 170 includes
	NFET transistors 172 and 174 and PFET transistors 176 and
	178. Isolation circuit 170 is constructed and operates similarly
	to isolation circuit 70 in FIG. 2. Thus, when NFET transistors
	172 and 174 are biased on by a high signal on control signal
	IOEQ, and PFET transistors 176 and 178 are biased on by a
	low signal on control signal IOEQN, lines DLL1 and DLL2
	are coupled to the input/output latch lines IOLAT1 and
	IOLAT2, respectively."), 5:24-27 ("As will be described in
	more detail below, when the isolation circuit 70 is activated, it

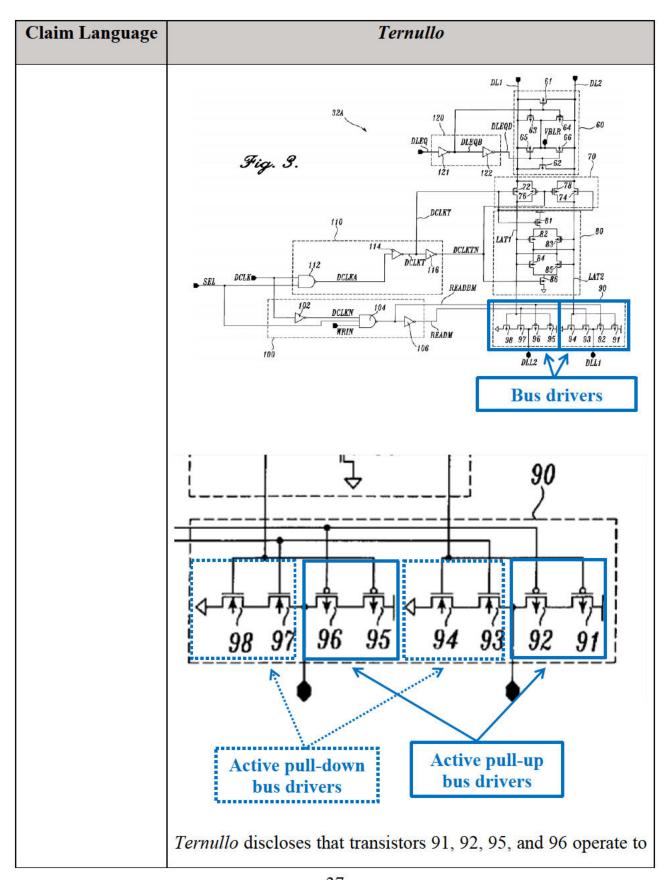
Claim Language	Ternullo
	allows signals to pass from the data lines DL1 and DL2 to the
	latch lines LAT1 and LAT2, respectively."). See also, e.g.,
	Ternullo 6:21-51, 8:45-55.

b. Claim 2

32. Ternullo discloses each and every feature of claim 2.

Claim Language	Ternullo
2. The data	Ternullo discloses a data transfer arrangement wherein the bus
transfer	drivers (e.g., transistor group 91-94 and transistor group 95-
arrangement in	98) comprise active pull-up (e.g., transistors 91, 92, 95, 96)
accordance with	and active pull-down (e.g., transistors 93, 94, 97, 98) bus
claim 1 wherein	drivers.
the bus drivers	
comprise active	
pull-up and active	
pull-down bus	
drivers.	

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Claim Language	Ternullo
	couple outputs DLL1 and DLL2 to Vdd (indicated by the flat
	line to the right of transistors 91 and 95) and thus serve as
	active pull-up bus drivers, and that transistors 93, 94, 97, and
	98 operate to couple outputs DLL1 and DLL2 to ground
	(indicated by the triangle to the left of transistors 94 and 98)
	and thus serve as active pull-down bus drivers: "The read
	driver coupled to latch line LAT2 includes PFET transistors 91
	and 92 and NFET transistors 93 and 94. The read driver
	coupled to latch line LAT1 includes PFET transistors 95 and
	96 and NFET transistors 97 and 98. While the connections and
	operation of the read driver connected to latch line LAT2 will
	be described below, it is understood that the read driver
	connected to latch line LAT1 is constructed and operates
	similarly. PFET transistor 91 has its source coupled to V_{DD} , its
	gate coupled to latch line LAT2, and its drain coupled to the
	source of PFET transistor 92. PFET transistor 92 has its gate
	coupled to a control signal READBM and its drain coupled to
	the drain of NFET transistor 93 and also coupled to the line
	DLL1. NFET transistor 93 has its gate coupled to the signal

Claim Language	Ternullo
	READM and its source coupled to the drain of NFET
	transistor 94. NFET transistor 94 has its gate coupled to the
	latch line LAT2 and its source coupled to ground. The read
	driver operates such that when the signal on the latch line
	LAT2 is low, PFET transistor 91 is biased on, and if the signal
	READBM is also low at that time, a high signal will be passed
	to the line DLL1. If the latch line LAT2 is high, then the
	NFET transistor 94 will be biased on, and if the signal
	READM is high, then a low signal will be passed to the line
	DLL1." Ternullo 7:15-37 (emphasis added).

c. Claim 3

33. Ternullo discloses each and every feature of claim 3.

Claim Language	Ternullo
3. The data	As illustrated in Claim 1, Ternullo discloses a data transfer
transfer	arrangement including a latching sense amplifier with a first
arrangement in	stage. Ternullo Fig. 5 (annotated below).
accordance with	
claim 1,	

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Claim Language	Ternullo
	Fig. 5. DLL1" 200 10EQ 170 190 203 10EQ 170 193 204 10EQ 162 162 163 178 161 162 163 178 181 182 182 184 186 193 194 101 160 220 176 10L2" 198 206 207 198 206 207 208
wherein the first	Ternullo discloses a first stage of a latching sense amplifier
stage of the	comprising a plurality of input pass transistors (e.g., transistors
latching sense	172, 174, 176, 178) each having a gate, a source terminal, and
amplifier	a drain. See, e.g., Ternullo Fig. 5 (annotated below).
comprises: a	
plurality of input	
pass transistors	
each having a	

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Claim Language	Ternullo
gate, a source	
terminal, and a	Fig. 5.
drain; and	DLL1
	Plurality of input pass transistors First stage
	Transistors 172, 174, 176, and 178 in <i>Ternullo</i> 's isolation circuit 170 act as input pass transistors because "when NFET transistors 172 and 174 are biased on by a high signal on control signal IOEQ, and PFET transistors 176 and 178 are biased on by a low signal on control signal IOEQN, lines DLL1 and DLL2 are coupled to the input/output latch lines IOLAT1 and IOLAT2, respectively." <i>Ternullo</i> 8:37-42. One of ordinary skill in the art at the time of the alleged invention of the '130 Patent would have understood that 172,

Claim Language	Ternullo
	174, 176, and 178 are pass transistors since they pass the
	voltages from DLL1 and DLL2 to IOLAT1 and IOLAT2,
	respectively. Further, one of ordinary skill in the art at the time
	of the alleged invention of the '130 Patent would have
	understood the gate, source, and drain of the input pass
	transistors are indicated as follows in annotated Fig. 5 of
	Ternullo (sources in blue circles; drains in red circles; gates in
	green circles) ¹ :

¹ One of ordinary skill in the art at the time of the alleged invention of the '130 Patent would have understood that the identification of the sources and drains for the input pass transistors is dependent on the voltage provided to the transistors through DLL1 and DLL2. Nonetheless, the identification of the sources and drains in annotated Fig. 5 of *Ternullo* is consistent with the '130 Patent's specification and identification of sources and drains for the claimed input pass transistors.

Claim Language	Ternullo
	170 178 178
a plurality of	Ternullo discloses a first stage (shown in light blue) of a

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Claim Language	Ternullo
NMOS and	latching sense amplifier comprising of a plurality of NMOS
PMOS transistors	(e.g., NMOS transistors 184, 185, and 186) and PMOS
each having a	transistors (e.g., PMOS transistors 181, 182, 183) each having
gate, a source	a gate, a source terminal, and a drain. See, e.g., Ternullo Fig. 5
terminal, and a	(annotated below).
drain;	Fig. 5. Deg

Claim Language	Ternullo
	Ternullo discloses that "[i]nput/output latch 180 includes
	PFET ² transistors 181, 182 and 183 and NFET transistors
	184, 185 and 186." Ternullo 8:45-46 (emphasis added).
	One of ordinary skill in the art at the time of the alleged
	invention of the '130 Patent would have understood that the
	gate, source, and drain of the plurality of NMOS and PMOS
	transistors are indicated as follows in annotated Fig. 5 of
	Ternullo (sources in blue circles; drains in red circles; gates in
	green circles):

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² One of ordinary skill in the art at the time of the alleged invention of the '130 Patent would have understood that a p-channel MOSFET was often referred to as PFET or PMOS and that an n-channel MOSFET was often referred to as NFET or NMOS.

Claim Language	Terni	ullo
	IOLAT	180
	183	185
	IOLAT	2
wherein the	Ternullo discloses a first stage	of a latching sense amplifier
drains of the input	wherein the drains of the input p	ass transistors (e.g., transistors
pass transistors	172, 174, 176, 178) are couple	ed to the drains of the cross-
are coupled to the	coupled latch amplifier NMOS	(e.g., NMOS transistors 184,

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Claim Language	Ternullo
drains of the	185) and PMOS transistors (e.g., PMOS transistors 182, 183).
cross-coupled	See, e.g., Ternullo Fig. 5 (annotated below; drains in red
latch amplifier	circles) ³ :
NMOS and	
PMOS	
transistors,	

transistors is dependent on the voltage provided to the transistors through DLL1

and DLL2. Nonetheless, the identification of the drains in annotated Fig. 5 of

Ternullo is consistent with the '130 Patent's specification and identification of

drains for the claimed input pass transistors.

³ One of ordinary skill in the art at the time of the alleged invention of the '130 Patent would have understood that the identification of the drains for the input pass

Claim Language	Ternullo
	Coupling drains of input pass transistors 174, 178 to drains of NMOS 185 and PMOS 183 IOLAT1 180 10LAT2 Coupling drains of input pass transistors 172, 176 to drains of NMOS 184 and PMOS 182 Ternullo further discloses that "[i]solation circuit 170 includes NFET transistors 172 and 174 and PFET transistors 176 and 178. Isolation circuit 170 in FIG. 2. Thus, when NFET transistors

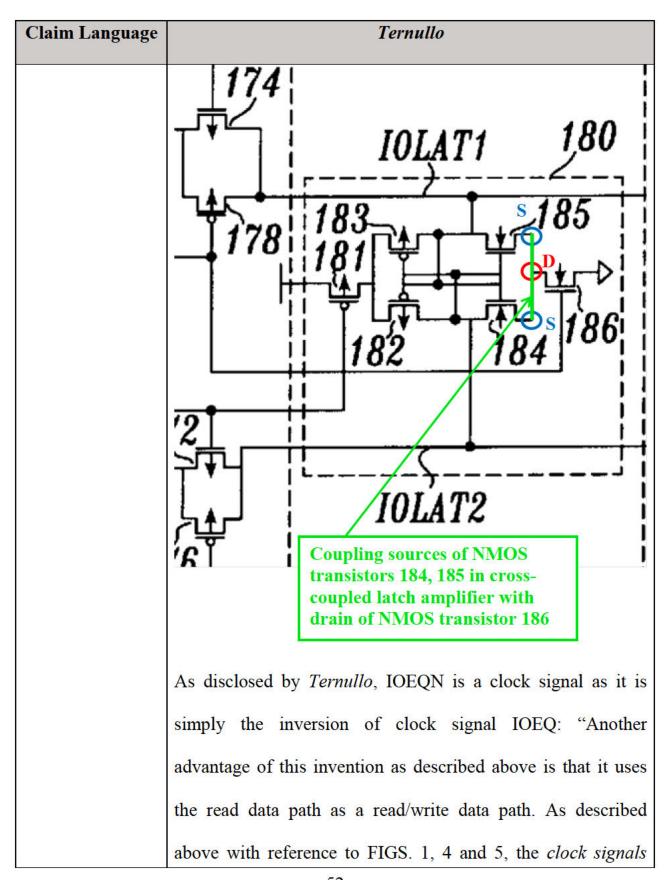
Claim Language	Ternullo
	172 and 174 are biased on by a high signal on control signal
	IOEQ, and PFET transistors 176 and 178 are biased on by a
	low signal on control signal IOEQN, lines DLL1 and DLL2
	are coupled to the input/output latch lines IOLAT1 and
	IOLAT2, respectively." Ternullo 8:34-42 (emphasis added).
each source	Ternullo discloses a first stage of a latching sense amplifier
terminal of the	wherein each source terminal of the input pass transistors (e.g.,
input pass	transistors 172, 174, 176, 178) is coupled to an input. See, e.g.,
transistors is	Ternullo Fig. 5 (annotated below; sources in blue circles).4
coupled to an	
input,	

⁴ One of ordinary skill in the art at the time of the alleged invention of the '130 Patent would have understood that the identification of the sources for the input pass transistors is dependent on the voltage provided to the transistors through DLL1 and DLL2. Nonetheless, the identification of the sources in annotated Fig. 5 of *Ternullo* is consistent with the '130 Patent's specification and identification of sources for the claimed input pass transistors.

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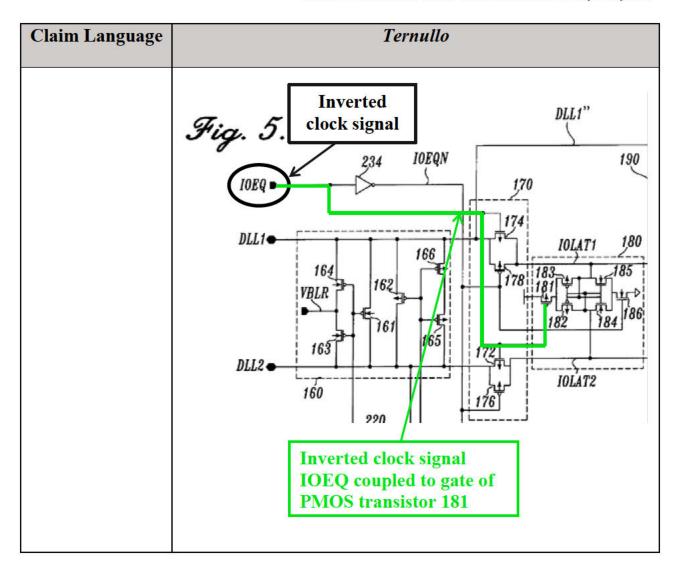
Claim Language	Ternullo
	Input coupled to sources of input pass transistors 174, 178 IOEQ Input Input
the sources of the	Ternullo discloses a first stage of a latching sense amplifier
cross-coupled	wherein the sources of the cross-coupled latch amplifier
latch amplifier	NMOS transistors (e.g., NMOS transistors 184, 185) are
NMOS transistors	coupled to the drain of the NMOS transistor (e.g., NMOS
are coupled to the	transistor 186) coupled to a clock signal input (e.g., IOEQN).
drain of the	See, e.g., Ternullo Fig. 5 (annotated below; sources in blue

Claim Language	Ternullo
NMOS transistor	circles; drains in red circles):
coupled to a clock	Clock signal IOEQN coupled
signal input, and	Fig. 5. Clock signal to NMOS transistor 186 DLL1"
	$\frac{234}{234} \frac{10EQN}{190}$
	10EQ - 170
	DLL1 166 10LAT1 180
	DLL2 — 163 165 172 10LAT2 160 220 176 176 183 185 185 185 185 186 185 182 184 186



Claim Language	Ternullo
	DCLK and IOEQ control the equalization circuits between the
	data latch lines DLL1 and DLL2, and the input/output lines
	IO1 and IO2, respectively. As illustrated with respect to FIGS.
	7 and 8, clock signals IOEQ and DCLK are disabled during a
	write operation so as to allow the lines IO1, IO2, DLL1, and
	DLL2 to be over-driven with the write data." Ternullo 15:14-
	23 (emphasis added); see also, e.g., id. 8:42-44 ("Control
	signal IOEQN is generated by inverter 234. Inverter 234
	receives as its input signal IOEQ and outputs signal IOEQN."),
	8:48-51, 12:41-44.
the sources of the	Ternullo discloses a first stage of a latching sense amplifier
PMOS transistors	wherein the sources of the PMOS transistors (e.g., PMOS
are coupled to the	transistors 182, 183) are coupled to the drain of the PMOS
drain of the	transistor (e.g., PMOS transistor 181) having a gate coupled to
PMOS transistor	an inverted clock signal input (e.g., IOEQ). See, e.g., Ternullo
having a gate	Fig. 5 (annotated below; sources in blue circles; drains in red
coupled to an	circles):
inverted clock	
signal input.	

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Claim Language	Ternullo
	174 10LAT1 180 178 183 183 184 186 182 184
	Coupling sources of PMOS transistors 182, 183 in cross- coupled latch amplifier with drain of PMOS transistor 181 As disclosed by Ternullo, IOEQ is the inversion of clock
	signal IOEQN: "Another advantage of this invention as described above is that it uses the read data path as a read/write data path. As described above with reference to FIGS. 1, 4 and 5, the <i>clock signals</i> DCLK and <i>IOEQ</i> control the equalization

Claim Language	Ternullo
	circuits between the data latch lines DLL1 and DLL2, and the
	input/output lines IO1 and IO2, respectively. As illustrated
	with respect to FIGS. 7 and 8, clock signals IOEQ and DCLK
	are disabled during a write operation so as to allow the lines
	IO1, IO2, DLL1, and DLL2 to be over-driven with the write
	data." Ternullo 15:14-23 (emphasis added); see also, e.g., id.
	8:48-51, 12:41-44.

d. Claim 5

34. Ternullo discloses each and every feature of claim 5.

Claim Language	Ternullo
5. The data	Ternullo discloses a data transfer arrangement wherein the
transfer	voltage precharge source is configured to precharge the
arrangement in	differential bus (e.g., DLL1 and DLL2) to a predetermined
accordance with	voltage that is less than a logic high voltage and greater than a
claim 1, wherein	logic low voltage.
the voltage	Ternullo discloses that "[a]s shown in FIG. 5, equalizing
precharge source	circuit 160 includes NFET transistors 161, 163, and 164, and
is configured to	PFET transistors 162, 165, and 166. Equalizing circuit 160 is

Claim Language	Ternullo
precharge the	constructed and operates similarly to equalizing circuit 60 of
differential bus to	FIG. 2. Thus, when control signal DCLKD is high and signal
a predetermined	DCLKN is low, NFET transistor 161 and PFET transistor 162
voltage that is	couple line DLL1 to line DLL2, while NFET transistors 163
less than a logic	and 164 and PFET transistors 165 and 166 couple the lines
high voltage and	DLL1 and DLL2 to the midlevel voltage source VBLR."
greater than a	Ternullo 8:23-33 (emphasis added).
logic low voltage.	

e. Claim 6

35. Ternullo discloses each and every feature of claim 6.

Claim Language	Ternullo
6. The data	Ternullo discloses a data transfer arrangement further
transfer	comprising a precharge circuit (e.g., equalizing circuit 160)
arrangement in	coupled between the precharge source (e.g., VBLR) and the
accordance with	differential bus (e.g., DLL1 and DLL2). See, e.g., Ternullo
claim 1 further	Figs. 4, 5 (annotated below).
comprising a	
precharge circuit	
coupled between	

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Claim Language	Ternullo
the precharge	DLL2 DLL1
source and the	220 DCLKD 160
differential bus.	DCLK EQUALIZING LOGIC WRIN 234 IOEQN ISOLATION CIRCUIT 100 LATCH 230 190 READD REA
	Fig. 4.
	Ternullo discloses that "[a]s illustrated in FIG. 4, equalizing
	circuit 160 is coupled between the data latch lines DLL1 and
	DLL2. Equalizing circuit 160 is controlled by control signals
	DCLKN and DCLKD from equalizing logic circuit 220, which
	receives as inputs control signals DCLK and WRIN.
	Equalizing circuit 160 operates similarly to equalizing circuit
	60 of FIG. 2, so as to tie the data latch lines DLL1 and DLL2

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Claim Language	Ternullo
	together and bring them to a common mid-level voltage." Ternullo 7:50-57. Voltage precharge source Pig. 5. 10EQ 10E
	Ternullo further discloses that "[a]s shown in FIG. 5, equalizing circuit 160 includes NFET transistors 161, 163, and 164, and PFET transistors 162, 165, and 166. Equalizing circuit 160 is constructed and operates similarly to equalizing circuit 60 of FIG. 2. Thus, when control signal DCLKD is high
	and signal DCLKN is low, NFET transistor 161 and PFET

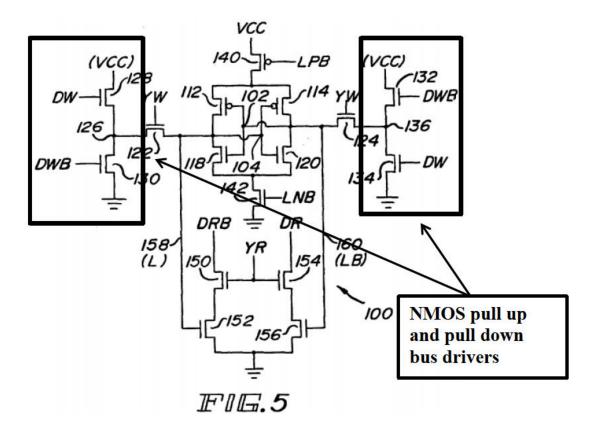
Claim Language	Ternullo
	transistor 162 couple line DLL1 to line DLL2, while NFET
	transistors 163 and 164 and PFET transistors 165 and 166
	couple the lines DLL1 and DLL2 to the midlevel voltage
	source VBLR." Ternullo 8:24-33.
	The precharge circuit is between the voltage precharge source
	and the differential bus because the transistors within the
	precharge circuit connect the voltage precharge source to the
	differential bus. See, e.g., Ternullo 8:24-33. This is consistent
	with the '130 Patent's disclosure and the Patent Owner's
	characterization of the disclosure during reexamination:
	Vdd Vpr 13 20 N1
	Ex. 1004, p. 68 (declaration of Dr. Philip Koopman disclosing
	precharge circuit 13 and the "differential bus").

- 2. Ternullo and Hardee Disclose or Suggest the Features of Claim 7
- 36. In my opinion, *Ternullo* and *Hardee* disclose or suggest each and every feature recited in claim 7, which is reproduced below:

The data transfer arrangement in accordance with claim 2 wherein the active pull up and pull down bus drivers are NMOS transistors.

- 37. As I discussed above in connection with claim 2, *Ternullo* discloses a data transfer arrangement with active pull up and active pull down bus drivers. *See*, *e.g.*, *Ternullo* Fig. 5, 7:15-37. *Ternullo* discloses that the active pull up and pull down bus drivers comprise of both NMOS and PMOS transistors. *See*, *e.g.*, *Ternullo* Fig. 5, 7:15-37. One of ordinary skill in the art at the time of the alleged invention of the '130 Patent, however, would have modified *Ternullo* so that the active pull up and pull down bus drivers comprised entirely of NMOS transistors.
- 38. It was well known at the time of the alleged invention of the '130 Patent that active pull up and active pull down bus drivers could be designed with solely NMOS transistors. For example, Fig. 5 of *Hardee* discloses NMOS active pull up (128 and 132) and pull down (130 and 134) drivers:

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Hardee discloses:

Transistors 128 and 130 are N channel devices having their source-drain paths coupled in series. The drain of transistor 128 is coupled to VCC and the source of transistor 130 is coupled to ground. A data write signal DW is coupled to the gate electrode of transistor 128 and its complement DWB is coupled to the gate electrode of transistor 130. A similar configuration exists on the right side of sense amplifier 100 where transistors 132 and 134 are coupled between VCC and ground and have a node 136 there between which is coupled to transistor 124. Note, however, that the data write signal DW is coupled to control transistor 134 whereas its complement DWB is

coupled to the gate electrode of transistor 132. That is to say, the data write signal DW turns on a *pull-up* transistor 128 on the left side of the sense amplifier 100, but turns on a *pull down transistor 134* on the right side of sense amplifier 100. Its complementary signal DWB likewise has reciprocal effects on the left and right sides.

Hardee 6:28-46 (emphasis added).

39. Given the teachings of *Hardee*, which like *Ternullo* is also concerned with signal transmission and improving the efficiency of such transmissions (see supra Section VI.A), one of ordinary skill in the art at the time of the alleged invention of the '130 Patent would have been motivated to reconfigure the circuit of *Ternullo* to include NMOS pull up and pull down bus drivers. One of ordinary skill in the art at the time of the alleged invention of the '130 Patent would have done so in order to reduce the layout area and avoid latch-up. The use of only NMOS transistors in the driver eliminates the need for the n-well used in the construction of PMOS transistors and thus reduces the layout size. Small layout size can be important when connecting the drivers up to an array of transistors, as used in a memory, or driving a parallel data bus where the data signals are laid out directly adjacent to each other. Further, by eliminating the PMOS device, the driver becomes immune to latch-up. Latch-up causes a wire to short to the power supply Vdd (or Vcc) or ground. Avoiding latch-up is especially important when

driving a signal off-chip where the driver is connected to a bonding wire which is inductive and thus can produce ringing voltages.

40. Further, in my opinion, implementing pull up and pull down bus drivers using solely NMOS transistors in *Ternullo* is simply a design choice that one of ordinary skill in the art at the time of the alleged invention of the '130 Patent would have certainly understood. This follows from the fact that there were a small finite number of MOSFET configurations for implementing pull up and pull down bus drivers (e.g., NMOS, PMOS, or CMOS – both NMOS and PMOS). In fact, this change would have amounted to nothing more than applying known techniques to improve similar devices in the same way to yield predictable results.

3. Ternullo and Sukegawa Disclose or Suggest the Features of Claim 9

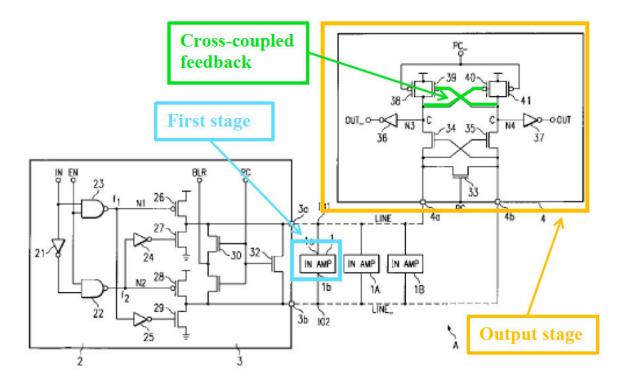
41. In my opinion, *Ternullo* and *Sukegawa* disclose or suggest each and every feature recited in claim 9, which is reproduced below:

The data transfer arrangement of claim 1 wherein the output stage includes cross-coupled feedback.

42. As I discussed above in connection with claim 1, *Ternullo* discloses a data transfer arrangement with an output stage. *See, e.g., Ternullo* Fig. 5, 8:56-62. The output stage does not disclose cross-coupled feedback. However, one of ordinary skill in the art at the time of the alleged invention of the '130 Patent

would have modified *Ternullo* so that the output stage included cross-coupled feedback.

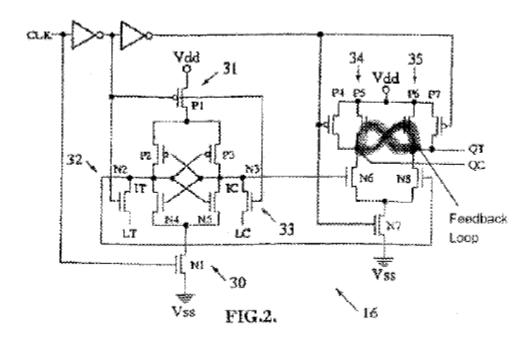
43. It was well known at the time of the alleged invention of the '130 Patent that an output stage with cross-coupled feedback could be coupled to the output of a first stage of a latching differential amplifier. For example, Fig. 1 of *Sukegawa* below discloses an output stage (e.g., receiver circuit 4) that includes cross-coupled feedback coupled to the output of a first stage:



The cross-coupled feedback identified above is consistent with the "cross-coupled feedback" identified by the Patent Owner during *inter partes* reexamination.

Specifically, Patent Owner argued that "cross-coupled feedback" was

demonstrated by Fig. 2 of the '130 Patent, which is nearly (if not entirely) identical with Petitioner's mapping of *Sukegawa*:



Ex. 1004, p. 127. Patent Owner argued that "feedback' should be construed to mean "a loop in the topography of a circuit where, in addition to its input being connected to its output, its output is also connected to its input via a different path." *Id.*, p. 126. The circuit in *Sukegawa* meets this definition as the output C above transistor 34 is tied to the input gate of transistor 40 and the output C above transistor 35 is tied to the input gate of transistor 39. *See, e.g., Sukegawa* 8:59-64, Fig. 1. Indeed, this identical circuitry disclosed by Fig. 2 of the '130 Patent was not only sufficient to satisfy the "feedback" limitation of claim 9, but also the additional limitation that the feedback must be "cross-coupled." Ex. 1004, pp. 126-

27, 39-40. Accordingly, in my opinion, *Sukegawa* discloses cross-coupled feedback.

44. In addition, one of ordinary skill in the art at the time of the alleged invention of the '130 Patent would have recognized that the output stage of Sukegawa is analogous to the output stage identified in Ternullo, which is also concerned with signal transmission and improving the efficiency of such transmissions (see supra Section VI.A). Like the output stage of Ternullo, the output stage of *Sukegawa* receives signals after the signals have been amplified by a differential amplifier, and thus structurally, one of ordinary skill in the art at the time of the alleged invention of the '130 Patent could have modified the output stage of the latching sense amplifier disclosed in Ternullo with the output stage disclosed in Sukegawa. Further, one of ordinary skill in the art at the time of the alleged invention of the '130 Patent would have been motivated to modify the output stage of Ternullo with the output stage of Sukegawa because Sukegawa's output stage employs positive feedback, which could have achieved faster switching, a desirable result in high-speed signal transmissions. In fact, this change would have amounted to nothing more than applying known techniques to improve similar devices in the same way to yield predictable results.

VII. CONCLUSION

In summary, it is my opinion that certain references disclose or 45.

suggest all of the features recited in the challenged claims of the '130 Patent.

I declare that all statements made herein of my knowledge are true, 46.

and that all statements made on information and belief are believed to be true, and

that these statements were made with the knowledge that willful false statements

and the like so made are punishable by fine or imprisonment, or both, under

Section 1001 of Title 18 of the United States Code.

Dated: June 26, 2015

By: _ R. J. Dale

DECLARATION OF DR. R JACOB BAKER APPENDIX A

R. JACOB (JAKE) BAKER, PH.D., P.E.



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SUMMARY

- Extensive leadership experience including:
 - Chair, Electrical and Computer Engineering Department, Boise State University;
 - Dealing with conflict, problems, and limited resources;
 - Leading the department through ABET accreditation;
 - o Creation and implementation of both Master and Doctoral programs in ECE.
- Active scholar (h-index > 30 and an i10-index > 90) whose research is focused on:
 - High-speed interfaces for electro-optic, mixed-signal, and analog integrated circuits;
 - O Design of writing and sensing circuitry for emerging nonvolatile memory technologies, focal planes, and displays (arrays) in nascent nanotechnologies (e.g. magnetic, chalcogenide);
 - o Analog and mixed-signal circuit techniques for nanometer CMOS; 3D packaging techniques
 - o The design of instrumentation for scientific research
 - o Delivery of circuit design education to off-campus students/engineers via the Internet.
- Mentor to:
 - Approximately 75 graduate students (major professor), http://CMOSedu.com/jbaker/students/students.htm
 - Electrical and Computer Engineering Department faculty;
 - Engineers locally, nationally, and internationally;
 - o New and established companies.
- Inventor with 137 granted US patents
- Experienced integrated circuit designer and educator with significant industry experience. See additional information at http://cmosedu.com/jbaker/projects/fund.htm
- Textbook authorship and Internet contributions (see http://CMOSedu.com), that have helped tens of thousands of engineers around the world.
- Recognized by the IEEE Power Electronics Society with the Best Paper Award in 2000 (IEEE Transactions on Power Electronics) from PhD dissertation work.
- International known in the field of integrated circuit design, recipient of many honors including the Terman Award, the IEEE CAS Education Award, and IEEE Fellow.

R. JACOB BAKER Page 1

EDUCATION

- Ph.D. in Electrical Engineering; December 1993; University of Nevada, Reno, GPA 4.0/4.0. Dissertation Title: *Applying power MOSFETs to the design of electronic and electro-optic instrumentation.*
- M.S. and B.S. in Electrical Engineering: May 1986 and 1988; University of Nevada, Las Vegas. Thesis Title: *Three-dimensional simulation of a MOSFET including the effects of gate oxide charge.*

ACADEMIC EXPERIENCE

- January 1991 Present: Professor of Electrical and Computer Engineering at the University of Nevada, Las Vegas from August 2012 to present. From January 2000 to July 2012 held various positions at Boise State University including: Professor (2003 2012), Department Chair (2004 2007), and tenured Associate Professor (2000 2003). From August 1993 to January 2000 was a tenured/tenure track faculty member at the University of Idaho: Assistant Professor (1993 1998) and then tenured Associate Professor (1998). Lastly, from January 1991 to May 1993 held adjunct faculty positions in the departments of Electrical Engineering at the University of Nevada, Las Vegas and Reno. Additional details:
 - Research is focused on analog and mixed-signal integrated circuit design. Worked with multidisciplinary teams (civil engineering, biology, materials science, etc.) on projects that have been funded by EPA, DARPA, NASA, and the Air Force Research Lab.
 - Current research interests are:
 - o Design of readout integrated circuits (ROICs) for use with focal plane arrays (FPAs)
 - o Heterogeneous integration of III-V photonic devices (e.g. FPAs and VCSELs) with CMOS
 - Methods (e.g., 3D packaging and capacitive interconnects) to reduce power consumption in semiconductor memories
 - Analog and mixed-signal circuit design for communication systems, synchronization, energy storage, and data conversion
 - The design of writing and sensing circuitry for emerging nonvolatile memory technologies, focal planes, and displays (arrays) in nascent nanotechnologies (e.g. magnetic, chalcogenide)
 - o Reconfigurable electronics design using nascent memory technologies
 - Finding an electronic, that is, no mechanical component, replacement for the hard disk drive using nascent fabrication technologies
 - Methods to deliver circuit design education to industry and off-campus students, see videos here
 - Led, as chair, the department in graduate curriculum (MS and PhD), program development, and ABET accreditation visits.
 - Worked with established and start-up companies to provide technical expertise and identify employment opportunities for students.
 - Held various leadership and service positions including: ECE chair, graduate coordinator, college curriculum committee (chair), promotion and tenure committee, scholarly activities committee, faculty search committee, university level search committees, etc. Collaborate with College of Engineering faculty on joint research projects.
 - Taught courses in circuits, analog IC design, digital VLSI, and mixed-signal integrated circuit design to both on- and, via the Internet, off-campus students. Research emphasis in integrated circuit design using nascent technologies.

INDUSTRIAL EXPERIENCE

- **2013 present:** Working with Freedom Photonics and Attolo Engineering in the Santa Barbara area on the integration of optics with CMOS integrated circuits including Avalanche Photodiodes. Work has resulted, and should continue to result in, support via the SBIR and STTR programs.
- **2013 present:** Working with National Security Technologies, LLC,) on the Design of Integrated electrical/photonic application specific integrated circuit (ASIC) design.
- **2013 2015:** Consultant for OmniVision. Working on integrating CMOS image sensors with memory for very high-speed consumer imager products.
- **2010 2013:** Worked with Arete' Associates on the design of high-speed compressive transimpedance amplifiers for LADAR projects and the design of ROIC unit cells. Work funded by the U. S. Air Force.
- **2013:** Cirque, Inc. Consulting on the design of analog-to-digital interfaces for capacitive touch displays and pads.
- 2012: Consultant at Lockheed-Martin Santa Barbara Focal Plane Array. CMOS circuit design for the development and manufacture of infrared components and imaging systems with an emphasis on highest sensitivity Indium Antimonide (InSb) focal plane arrays (FPAs) in linear through large staring formats. Product groups include FPAs, integrated dewar assemblies (IDCAs), camera heads, and infrared imaging systems.
- **2010 2012:** Working with Aerius Photonics (and then FLIR Inc. when Aerius was purchase by FLIR) on the design of Focal Plane Arrays funded (SBIRs and STTRs) by the U.S. Air Force, Navy, and Army. Experience with readout integrated circuits (ROICs) and the design/layout of photodetectors in standard CMOS.
- **2009 2010:** Sun Microsystems, Inc. (now Oracle) VLSI research group. Provided consulting on memory circuit design and proximity connection (PxC) interfaces to DRAMs and SRAMs for lower power and 3D packaging.
- **2009 2010:** Contour Semiconductor, Inc. Design of NMOS voltage and current references as well as the design of a charge pump for an NMOS memory chip.
- 1994 2008: Affiliate faculty (Senior Designer), Micron Technology. Designed CMOS circuits for DRAMs including DLLs (design is currently used in Micron's DDR memory), PLLs for embedded graphics chips, voltage references and regulators, data converters, field-emitting display drivers, sensing for MRAM (using delta-sigma data conversion topologies), CMOS active pixel imagers and sensors, power supply design (linear and switching), input buffers, etc. Worked on a joint research project between Micron and HP labs in magnetic memory using the MJT memory cell. Worked on numerous projects (too many to list) resulting in numerous US patents (see following list). Considerable experience working with product engineering to ensure high-yield from the production line.
 - Co-authored a book on DRAM circuit design through the support of Micron. Gained knowledge in the entire memory design process from fabrication to packaging.
 - Developed, designed, and tested circuit design techniques for multi-level cell (MLC) Flash memory using signal processing (35 nm technology node).
- **January 2008:** Consultant for Nascentric located in Austin, TX. Provide directions on circuit operation (DRAM, memory, and mixed-signal) for fast SPICE circuit simulations.
- **May 1997 May 1998:** Consultant for Tower Semiconductor, Haifa, Israel. Designed CMOS integrated circuit cells for various modem chips.
- **Summer 1998:** Consultant for Amkor Wafer Fabrication Services, Micron Technology, and Rendition, Inc., Design PLLs and DLLs for custom ASICs and a graphics controller chip.

- **Summers 1994 1995:** Micron Display Inc. Designing phase locked loop for generating a pixel clock for field emitting displays and a NTSC to RGB circuit on chip in NMOS. These displays are miniature color displays for camcorder and wrist watch size color television.
- **September October 1993:** Lawrence Berkeley Laboratory. Designed and constructed a 40 A, 2 kV power MOSFET pulse generator with a 3 ns risetime and 8 ns falltime for driving Helmholtz coils.
- **Summer 1993:** Lawrence Livermore National Laboratory, Nova Laser Program. Researched picosecond instrumentation, including time-domain design for impulse radar and imaging.
- December 1985 June 1993: (from July 1992 to June 1993 employed as a consultant), E.G.&G. Energy Measurements Inc., Nevada, Senior Electronics Design Engineer. Responsible for the design and manufacturing of instrumentation used in support of Lawrence Livermore National Laboratory's Nuclear Test Program. Responsible for designing over 30 electronic and electro-optic instruments. This position provided considerable fundamental grounding in EE with a broad exposure to PC board design to the design of cable equalizers. Also gained experience in circuit design technologies including: bipolar, vacuum tubes (planar triodes for high voltages), hybrid integrated circuits, GaAs (high speed logic and HBTs), microwave techniques, fiber optic transmitters/receivers, etc.
- **Summer 1985:** Reynolds Electrical Engineering Company, Las Vegas, Nevada. Gained hands on experience in primary and secondary power system design, installation and trouble shooting electric motors on mining equipment.

EXPERT WITNESS EXPERIENCE

The law firms and clients (underlined) whom I have provided expert witness services are listed below. I have been deposed eight times and given testimony at one trial.

Kilpatrick Townsend & Stockton LLP (Menlo Park and San Francisco, CA)

Case – Consultant for <u>SK hynix</u>, Inc. on matters relating to investigation of certain patents owned by Longitude Licensing Ltd.

Case Subject Matter – Semiconductor random access memory and communication interfaces.

Work Performed – Provided expert consulting services in 2015.

Ropes & Gray LLP (New York City, NY)

Case – Samsung, Inc. v. Imperium IP Holdings (Cayman), Ltd.

Case Number - IPR2015-01233. Filed on May 21, 2015.

Case Subject Matter – Data interface circuits that can be either a single-ended interface or a differential interface.

Work Performed – Provided expert consulting services and wrote declaration for inter partes review.

Morgan, Lewis & Bockius LLP (Palo Alto, CA)

Case – Silergy Corporation v. Monolithic Power Systems, Inc.

Case Numbers – IPR2015-00803 and IPR2015-00804. Filed on February 24, 2015.

Case Subject Matter – Microelectronic packaging.

Work Performed – Provided expert consulting services and wrote declarations for inter partes reviews.

Jones Day LLP (San Diego, CA)

Case – *Micron Technology, Inc.* v. eDigital Corp.

Case Number - IPR2015-00519. Filed on December 31, 2014.

Case Subject Matter – Methods for memory management in non-volatile flash memories.

Work Performed – Provided expert consulting services and wrote declaration for inter partes review.

Fish & Richardson P.C. (Atlanta, GA and Washington, DC)

Case – <u>Micron Technology, Inc.</u> v. MLC Intellectual Properties and BTG USA/International Inc.

Case Number - IPR2015-00504. Filed on December 24, 2014.

Case Subject Matter – Multi-level non-volatile floating gate memory, e.g. EPROM, EEPROM, and flash technologies.

Work Performed – Provided expert consulting services and wrote declaration for inter partes review.

Skadden, Arps, Slate, Meagher & Flom LLP & Affiliates (Palo Alto, CA)

Case – ALFRED T. GIULIANO, Chapter 7 Trustee of the Ritz Estate; CPM ELECTRONICS INC.; E.S.E. ELECTRONICS, INC. and MFLASH, INC., on Behalf of Themselves and All Others Similarly Situated v. SanDisk Corp.

Case Number – California, ND (Oakland) 4:10-cv-02787. Fourth amended complaint filed on September 24, 2014.

Case Subject Matter - Non-volatile semiconductor flash memory.

Work Performed – Provided expert consulting services.

Ropes & Gray LLP (East Palo Alto, CA, New York City, NY, and Washington, DC)

Case – Macronix International Co., Ltd. v. <u>Spansion, Inc.</u>, <u>Aerohive Networks</u>, <u>Allied Telesis</u>, <u>Ciena</u>, <u>Delphi Automotive</u>, <u>Polycom</u>, <u>Ruckus Wireless</u>, <u>ShoreTel</u>, <u>Tellabs</u>, and <u>TiVo</u>

Case Number – ITC Investigation No. 337-TA-922. Complaint filed on June 27, 2014.

Case Subject Matter – Devices containing non-volatile memory and products containing the same.

Work Performed – Provided expert consulting, non-infringement analysis, invalidity analysis, Markman tutorial, and expert report.

Quinn Emanuel Urquhart & Sullivan, LLP (San Francisco, CA and Washington, DC)

Case – Freescale Semiconductor, Inc. v. MediaTek, Inc., et. al.

Case Number – ITC Investigation No. 337-TA-920. Amended complaint filed on May 27, 2014.

Case Subject Matter – Semiconductor integrated circuits and devices containing the same.

Work Performed – Provided expert consulting services.

DLA Piper (East Palo Alto and San Diego, CA)

Case – GSI Technology, Inc. v. Cypress Semiconductor Corporation

Case Number – IPR2014-00419. Filed on February 7, 2014.

Case Subject Matter – Semiconductor static random access memory (SRAM) circuit design.

Work Performed – Provided expert consulting services and wrote declaration for inter partes review.

Ropes & Gray LLP (Washington, DC)

Case – Macronix International Co., Ltd. v. *Spansion, Inc.*, et al.

Case Number – Virginia, ED 3:13-cv-00679. Complaint filed on November 20, 2013.

Case Subject Matter – Non-volatile semiconductor flash memory.

Work Performed – Provided expert consulting, non-infringement analysis, and invalidity analysis.

Cooley LLP (San Diego, CA)

Case – HSM Portfolio LLC and Technology Properties Limited LLC v. Fujitsu, AMD, *Qualcomm, Inc.*, Elpida, SK Hynix, Micron, ProMOS, SanDisk, Sony, ST Micro, Toshiba, ON, and Zoran

Case Number – Delaware, 1:11-cv-00770. Third amended complaint filed on June 28, 2013.

Case Subject Matter – Semiconductor sensing circuits.

Work Performed – Provided expert consulting, non-infringement analysis, and invalidity analysis.

DLA Piper (East Palo Alto and San Diego, CA)

Case – Cypress Semiconductor Corporation v. GSI Technology, Inc.

Case Number - California, ND 3:13-cv-02013. Complaint filed on May 1, 2013.

Case Subject Matter – Semiconductor static random access memory (SRAM) circuit design.

Work Performed – Provided expert consulting, claim construction, non-infringement analysis, and invalidity analysis.

Montgomery McCracken Walker & Rhoads LLP (Philadelphia, PA)

Case – Simon Nicholas Richmond v. Winchance Solar Fujian Technology, <u>Target</u>, <u>Creative Industries</u>, et. al.

Case Number – New Jersey, 3:13-cv-01954. Amended complaint filed on March 27, 2013.

Case Subject Matter – Circuitry including solar cells, re-chargeable batteries, energy conversion for solar lighting.

Work Performed – Provided expert consulting, non-infringement analysis, and invalidity analysis.

DLA Piper (East Palo Alto, CA)

Case – Intellectual Ventures I/II LLC v. *Toshiba, Inc.*

Case Number – Delaware, 1:13-cv-00453. Complaint filed on March 20, 2013.

Case Subject Matter – Semiconductor memory and interface circuits.

Work Performed – Provided expert consulting, non-infringement analysis, and invalidity analysis.

Alston & Bird, DLA Piper, Gibson Dunn, Katten, O'Melveny, Orrick, and WilmerHale (various locations in the USA)

Case – Freescale v. <u>Funai</u>, <u>CSR</u>, <u>Zoran</u>, <u>MediaTek</u>, <u>Vizio</u>, <u>Sanyo</u>, <u>TPF</u>, <u>Top Victory Electronics</u>, <u>Envision</u> Peripherals, AmTRAN, and Marvell

Case Number – Texas, WD 1:12-cv-00644. Amended complaint filed on January 14, 2013.

Case Subject Matter – Semiconductor circuitry for voltage regulators, bus terminations, packaging, and signal processing.

Work Performed – Provided expert consulting, claim construction, non-infringement analysis, invalidity analysis, and Markman tutorial.

Amin, Turocy & Watson LLP (San Jose and San Francisco, CA)

Case - InvenSense, Inc. v. Robert Bosch GmbH

Case Subject Matter – Microelectromechanical systems (MEMS) sensor design and manufacture.

Work Performed – Provided expert consulting services in 2013.

Morrison & Foerster LLP (Los Angeles, Palo Alto, and San Francisco, CA)

Case – STMicroelectronics, Inc. v. *InvenSense, Inc.*

Case Number – California, ND 3:12-cv-02475. Complaint filed on May 16, 2012.

Case Subject Matter – Microelectromechanical systems (MEMS) sensors including Gyroscopes and accelerometers.

Work Performed – Provided expert consulting, non-infringement analysis, invalidity analysis, and wrote declaration.

Kilpatrick Townsend & Stockton LLP (Menlo Park and San Francisco, CA)

Case – Consultant for <u>SK hynix</u>, Inc. on matters relating to investigation of certain patents owned by Round Rock Research LLC

Case Subject Matter – Semiconductor random access memory.

Work Performed – Provided expert consulting services in 2012.

Keker & Van Nest LLP (San Francisco, CA)

Case – Round Rock Research LLC v. SanDisk Corp.

Case Number - Delaware, 1:12-cv-00569. Complaint filed on May 3, 2012.

Case Subject Matter – Semiconductor non-volatile flash memory.

Work Performed – Provided expert consulting including: invalidity analysis, non-infringement analysis, expert reports, and was deposed.

Perkins Coie LLP (San Diego, CA)

Case – ASUS Computer International v. Round Rock Research LLC

Case Number – California, ND 3:12-cv-02099. Complaint filed on April 26, 2012.

Case Subject Matter – Semiconductor memory and image sensors.

Work Performed – Provided expert consulting, claim construction, non-infringement analysis, invalidity analysis, expert reports, and was deposed.

Morgan, Lewis & Bockius LLP (Palo Alto, CA)

Case – Dr. Michael Jaffe' as insolvency administrator for Qimonda AG v. LSI, <u>Atmel Corp</u>, Cypress, MagnaChip, and ON Semiconductor

Case Number – California, ND 3:12-cv-03166. Complaint filed on January 10, 2012.

Case Subject Matter – Semiconductor processing and manufacturing.

Work Performed – Provided expert consulting, non-infringement analysis, and invalidity analysis.

Useful Arts IP (Cupertino, CA)

Case – Tezzaron (formerly Tachyon Semiconductor) v. Elm Technology Corporation

Case Number – Patent Interference No. 105,859. Declared on December 1, 2011.

Case Subject Matter – Packaging of semiconductors and through semiconductor vias.

Work Performed – Patent interference, wrote declaration, and was deposed.

Morgan, Lewis & Bockius LLP (Palo Alto, CA)

Case – Nanya Technology Corporation v. <u>Elpida Memory, Inc. and Kingston Technology Company,</u> Inc.

Case Number – ITC Investigation No. 337-TA-821. Complaint filed on November 21, 2011.

Case Subject Matter – Semiconductor DRAM design and manufacture.

Work Performed – Provided expert consulting and reports on validity, infringement, and domestic industry. Also provided declarations and was deposed.

Morgan, Lewis & Bockius LLP (Washington, DC)

Case – *Elpida Memory, Inc.* v. Nanya Technology Corporation

Case Number – ITC Investigation No. 337-TA-819. Complaint filed on November 15, 2011.

Case Subject Matter – Semiconductor DRAM design and manufacture.

Work Performed – Provided expert consulting and reports on infringement, domestic industry, and validity. Also provided Markman tutorial, declarations, deposition, and testimony at the trial.

Ropes & Gray LLP (New York City, NY)

Case – Intellectual Ventures v. Sendai Nikon Corporation

Case Number – Delaware, 1:11-cv-01025. Complaint filed on October 26. 2011.

Case Subject Matter – Image sensor design and manufacture.

Work Performed – Provided expert consulting, non-infringement analysis, and invalidity analysis.

Farella Braun + Martel LLP (San Francisco, CA)

Case – Round Rock Research LLC v. *Dell, Inc.*

Case Number – Delaware, 1:11-cv-00976. Complaint filed on October 14, 2011.

Case Subject Matter – Semiconductor DRAM design and manufacture.

Work Performed – Provided expert consulting, non-infringement analysis, invalidity analysis, and wrote declaration.

Latham & Watkins LLP (San Francisco, CA)

Case – Altera Corp. v. LSI Corp. and Agere Systems, Inc.

Case Number – California, ND 4:11-cv-03139. Complaint filed on June 24, 2011.

Case Subject Matter – Semiconductor devices including phase-locked loops and clock recovery circuits.

Work Performed – Provided expert consulting, non-infringement analysis, and invalidity analysis.

Fish & Richardson P.C. (Washington, DC)

Case – Spansion LLC v. <u>Samsung Electronics Co., Ltd.</u>, Apple, Inc., Nokia Corp., PNY Technologies, Inc. Research In Motion Corporation, Transcend Information Inc.

Case Number – ITC Investigation No. 337-TA-735. Complaint filed on August 6, 2010.

Case Subject Matter – Semiconductor flash memory manufacture and design.

Work Performed – Provided expert consulting, non-infringement analysis, and invalidity analysis.

Jones Day LLP (Palo Alto, CA)

Case – LSI and Agere, Inc. v. Xilinx, Inc.

Case Number – New York, SD 1:09-cv-09719. Complaint filed on November 23, 2009.

Case Subject Matter – Semiconductor digital design and clocking.

Work Performed – Provided expert consulting, non-infringement analysis, and invalidity analysis.

Morrison & Foerster LLP (New York City, NY)

Case – Innurvation, Inc. et al v. *Fujitsu Microelectronics America, Inc.*, Sony Corporation of America, Toshiba America Electronics Components, Inc., and Freescale Semiconductor, Inc.

Case Number - Maryland, 1:09-cv-01416. Complaint filed on May 29, 2009.

Case Subject Matter – Semiconductor circuit layout.

Work Performed – Provided expert consulting, non-infringement analysis, and invalidity analysis.

Wilson Sonsini Goodrich & Rosati P.C. (Palo Alto, CA)

Case – Panavision Imaging, LLC, v. <u>OmniVision Technologies, Inc.</u>, Canon U.S.A., Inc., Micron Technology, Inc., Aptina Imaging Corporation, and Aptina, LLC.

Case Number – California, CD 2:09-cv-01577. Complaint filed on March 6, 2009.

Case Subject Matter – CMOS image sensor design and manufacture.

Work Performed – Provided expert consulting, non-infringement analysis, invalidity analysis, two expert reports, and wrote declaration.

McDermott Will & Emery (Menlo Park, CA)

Case – Volterra Semiconductor Corp. v. Primarion <u>& Infineon Technologies North America &</u> Infineon Technologies, A.G.

Case Number – California, ND 3:08-cv-05129. Complaint filed on November 12, 2008.

Case Subject Matter – High-performance analog and mixed-signal power management semiconductors.

Work Performed – Provided expert consulting, non-infringement analysis, invalidity analysis, two expert reports, and was deposed.

pre-2008 Miscellaneous minor expert witness work, was deposed twice.

MEMBERSHIPS IN PROFESSIONAL AND SCHOLARLY ORGANIZATIONS

IEEE (student, 1983; member, 1988; senior member, 1997; Fellow, 2013) Member of the honor societies Eta Kappa Nu and Tau Beta Pi Licensed Professional Engineer

HONORS AND AWARDS

- Tau Beta Pi UNLV Outstanding Professor of the Year in 2013 2015
- UNLV ECE Department Distinguished Professor of the Year in 2015
- IEEE Fellow for contributions to the design of memory circuits 2013
- Distinguished Lecturer for the IEEE Solid-State Circuits Society, 2013 2014
- IEEE Circuits and Systems (CAS) Education Award 2011
- Twice elected to the Administrative Committee of the Solid-State Circuits Society, 2011 2016
- Frederick Emmons Terman Award from the American Society of Engineering Education 2007
- President's Research and Scholarship Award, Boise State University 2005
- Honored Faculty Member Boise State University Top Ten Scholar/Alumni Association 2003
- Outstanding Department of Electrical Engineering faculty, Boise State 2001
- Recipient of the IEEE Power Electronics Society's Best Paper Award in 2000
- University of Idaho, Department of Electrical Engineering outstanding researcher award, 1998-99
- Elevated to Senior member of the IEEE, 1997
- University of Idaho, College of Engineering Outstanding Young Faculty award, 1996-97

SERVICE

Reviewer for IEEE transactions on solid-state circuits, circuits and devices magazine, education, instrumentation, nanotechnology, VLSI, etc. Reviewer for several American Institute of Physics journals as well (Review of Scientific Instruments, Applied Physics letters, etc.) Board member of the IEEE press (reviewed dozens of books and book proposals). Reviewer for the National Institutes of Health. Technology editor and then Editor-in-Chief for the Solid-State Circuits Magazine.

Led the Department on ABET visits, curriculum and policy development, and new program development including the PhD in electrical and computer engineering. Provided significant University and College service in infrastructure development, Dean searches, VP searches, and growth of academic programs. Provided university/industry interactions including starting the ECE department's advisory board. Held positions as the ECE department Masters graduate coordinator and coordinator for the Sophomore Outcomes Assessment Test (SOAT).

Also currently serves, or has served, on the IEEE Press Editorial Board (1999-2004), as a member of the first Academic Committee of the State Key Laboratory of Analog and Mixed-Signal VLSI at the University of Macau, as editor for the Wiley-IEEE Press Book Series on Microelectronic Systems (2010-present), on the IEEE Solid-State Circuits Society (SSCS) Administrative Committee (2011-present), as an Advisory Professor to the School of Electronic and Information Engineering at Beijing Jiaotong University, as the Technology Editor (2012-2014) and Editor-in-Chief (2015 present) for the IEEE Solid-State Circuits Magazine, as a Distinguished Lecturer for the SSCS (2013-2014), and as the Technical Program Chair for the IEEE 58th 2015 International Midwest Symposium on Circuits and Systems, MWSCAS 2015.

ARMED FORCES

6 years United States Marine Corps reserves (Fox Company, 2nd Battalion, 23rd Marines, 4th Marine Division), Honorable Discharge, October 23, 1987

TEXTBOOKS AUTHORED

Baker, R. J., "CMOS Circuit Design, Layout and Simulation, Third Edition" *Wiley-IEEE*, 1174 pages. ISBN 978-0470881323 (2010) **Over 50,000 copies of this book's three editions in print.**

- Baker, R. J., "CMOS Mixed-Signal Circuit Design," *Wiley-IEEE*, 329 pages. ISBN 978-0470290262 (second edition, 2009) and ISBN 978-0471227540 (first edition, 2002)
- Keeth, B., Baker, R. J., Johnson, B., and Lin, F., "DRAM Circuit Design: Fundamental and High-Speed Topics", Wiley-IEEE, 2008, 201 pages. ISBN: 978-0-470-18475-2
- Keeth, B. and Baker, R. J., "DRAM Circuit Design: A Tutorial", Wiley-IEEE, 2001, 201 pages. ISBN 0-7803-6014-1
- Baker, R. J., Li, H.W., and Boyce, D.E. "CMOS Circuit Design, Layout and Simulation," *Wiley-IEEE*, 1998, 904 pages. ISBN 978-0780334168

BOOKS, OTHER (edited, chapters, etc.)

- Saxena, V. and Baker, R. J., "Analog and Digital VLSI," chapter in the CRC Handbook on Industrial Electronics, edited by J. D. Irwin and B. D. Wilamowski, *CRC Press*, 2009 second edition.
- Li, H.W., Baker, R. J., and Thelen, D., "CMOS Amplifier Design," chapter 19 in the CRC VLSI Handbook, edited by Wai-kai Chen, *CRC Press*, 1999 (ISBN 0-8493-8593-8) and the second edition in 2007 (ISBN 978-0-8493-4199-1)
- Baker, R. J., "CMOS Analog Circuit Design," (A self-study course with study guide, videos, and tests.) IEEE Education Activity Department, 1999. ISBN 0-7803-4822-2 (with textbook) and ISBN 0-7803-4823-0 (without textbook)
- Baker, R. J., "CMOS Digital Circuit Design," (A self-study course with study guide, videos, and tests.) *IEEE Education Activity Department*, 1999. ISBN 0-7803-4812-5 (with textbook) and ISBN 0-7803-4813-3 (without textbook)

INVITED TALKS AND SEMINARS

Have given invited talks and seminars at the following locations: AMD (Fort Collins), AMI semiconductor, Arizona State University, Beijing Jiaotong University, Boise State University, Carleton University, Carnegie Mellon, Columbia University, Dublin City University (Ireland), E.G.&G. Energy Measurements, Foveon, the Franklin Institute, Georgia Tech, Gonzaga University, Hong Kong University of Science and Technology, ICySSS keynote, IEEE Electron Devices Conference (NVMTS), IEEE Workshop on Microelectronics and Electron Devices (WMED), Indian Institute of Science (Bangalore, India), Instituto de Informatica (Brazil), Instituto Tecnológico y de Estudios Superiores de Monterrey (ITESM, Mexico), Iowa State University, Lawrence Livermore National Laboratory, Lehigh University, Micron Technology, Nascentric, National Semiconductor, Princeton University, Rendition, Saintgits College (Kerala, India), Southern Methodist University, Sun Microsystems, Stanford University, ST Microelectronics (Delhi, India), Temple University, Texas A&M University, Tower (Israel), University of Alabama (Tuscaloosa), University of Arkansas, University of Buenos Aires (Argentina), University of Houston, University of Idaho, University of Illinois (Urbana-Champaign), Université Laval (Québec City, Québec), University of Macau, University of Maryland, Université de Montréal (École Polytechnique de Montréal), Xilinx (Ireland), University of Nevada (Las Vegas), University of Nevada (Reno), University of Toronto, University of Utah, Utah State University, and Yonsei University (Seoul, South Korea).

RESEARCH FUNDING

Recent funding listed below. In-kind, equipment, and other non-contract/grant funding [e.g., MOSIS support, money for travel for invited talks, etc.] not listed.

- Baker, R. Jacob, (2015) "Radiation Hardened Optoelectronics for Optical Interconnects," Electronics Defense Threat Reduction Agency (DTRA), \$45,000 submitted for funding
- Baker, R. Jacob, (2015) "Low Light Short Wave Infrared Focal Plane Arrays," Missile Defense Agency (MDA), \$44,999 submitted for funding
- Baker, R. Jacob, (2015) "High-Sensitivity Monolithic Silicon APD and ROIC," U.S. Air Force/DOD, \$299,665 submitted for funding
- Baker, R. Jacob, (2015-2016) "Advanced Printed Circuit Board Design Methods for Compact Optical Transceiver," U.S. Army/DOD, \$45,000
- Baker, R. Jacob, (2015) "Quantum Cryptography Detector Chip," Defense MicroElectronics Activity (DMEA), \$45,000
- Baker, R. Jacob, (2014-2015) "NSTec ASIC Integrated Circuit Collaboration," Department of Energy, National Security Technologies, LLC, \$90,000
- Baker, R. J., (2014-2015) "Silicon Photonic-Electronic System Level Integration," U.S. Air Force/DOD, \$54,607
- Baker, R. Jacob, (2013-2014) "NSTec ASIC Integrated Circuit Collaboration," Department of Energy, National Security Technologies, LLC, \$162,074
- Baker, R. Jacob, (2013) "Design Software Setup," Department of Energy, National Security Technologies, LLC, \$10,999
- Campbell, K. A. and Baker, R. J., (2009-2012) "Reconfigurable Electronics and Non-Volatile Memory Research" funded by the Air Force Research Laboratory, \$2,790,081
- Baker, R. J., (2010-2012) "Dual Well Focal Plane Array (FPA) Sensor," U.S. Navy, \$31,500
- Baker, R. J., (2011) "Readout-Integrated Circuit (ROIC) Development in Support of Corrugated Quantum Well Infrared Photo-detector (C-QWIP) Focal Plane Arrays (FPA) for Tactical Applications," U.S. Army, \$27,000
- Baker, R. J., (2011) "Monolithic CMOS LADAR Focal Plane Array (FPA) with a Photonic High-Speed Output Interface," U.S. Air Force/DOD, \$50,002
- Campbell, K. A., Baker, R. J., Peloquin, J., and Teasdale, J. (2008-2010) "Radiation Resistant Phase Change Memory and Reconfigurable Electronics," NASA. \$1,500,000
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- Baker, R. J., et. al., (2006-2010) "Establishment of a Doctoral Degree Program in Electrical and Computer Engineering in Electrical and Computer Engineering," Micron Foundation. \$5,000,000
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