UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

LAM RESEARCH CORP.,

Petitioner

v.

DANIEL L. FLAMM,

Patent Owner

U.S. Patent No. 6,017,221

Issued: January 5, 2000

Named Inventor: Daniel L. Flamm

Title: PROCESS DEPENDING ON PLASMA DISCHARGES SUSTAINED BY INDUCTIVE COUPLING

Case IPR2015-01767 Patent 6,017,221

PETITIONER'S REPLY

-

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TABLE OF AUTHORITIES

	Page(s)
Cases	
Allied Erecting and Dismantling Co., v. Genesis Attachments, LLC, Slip Op. No. 15-1533	20
In re Keller, 642 F.2d 413 (C.C.P.A., 1981)	20
KSR Int'l. Co. v. Teleflex Inc., 550 U.S. 398, 416 (2007)	20, 21
In re Mouttet, 686 F.3d 1322 (Fed. Cir. 2012)	20
Sakraida v. Ag. Pro., Inc., 425 U.S. 273, 282 reh'g denied, 426 U.S. 955 (1976)	21
In re Sasse. 629 F.2d675 (CCPA 1980)	21
Verdegaal Bros. v. Union Oil Co. of California, 814 F.2d 628 (Fed. Cir. 1987)	2
Statutes	
35 U.S.C. § 102(b)	1
35 U.S.C. § 103(a)	1, 4, 18



EXHIBIT LIST

Exhibit	Description		
1001	U.S. Patent No. 6,017,221 (the '221 patent)		
1002	Michael A. Lieberman and Richard A. Gottscho, <i>Design of High Density Plasma Sources for Materials</i> Processing, University of California, Berkeley Technical Report No. UCB/ERL M93/3 (January 11, 1993) (on file with the University of California, Berkeley Library) (Lieberman93)		
1003	U.S. Patent No. 5,573,595 (Dible)		
1004	U.S. Patent No. 4,877,999 (Knapp)		
1005	U.S. Patent No. 5,065,118 (Collins)		
1006	J. Hopwood, <i>Review of Inductively Coupled Plasmas for Plasma Processing</i> , Plasma Sources Sci. Technol. 1 , 109-116 (1992) (Hopwood)		
1007	Declaration of Joseph L. Cecchi, Ph.D.		
1008	Merriam-Webster's Collegiate Dictionary, Eleventh Edition, 2012		
1009	'221 Patent Prosecution History, 10/2/98 Office Action and 4/2/99 Response		
1010	Declaration of Miyoko Tsubamoto		
1011	Curriculum Vitae of Joseph L. Cecchi, Ph.D.		
1012	Michael A. Lieberman and Richard A. Gottscho, <i>Design of High-Density Plasma Sources for Materials Processing</i> , Plasma Sources for Thin Film Deposition and Etching (Physics of Thin Films Volume 18), August 1994 (Lieberman 94)		
1013	Publisher's Webpage for Plasma Sources for Thin Film Deposition and Etching (1st Edition), http://store.elsevier.com/product.jsp?isbn=9780125330183&_requestid=1611063 (last visited Aug. 13, 2015).		
1014	Declaration of Morgan Chu In Support of LAM's Unopposed Motion for <i>Pro Hac Vice</i> Admission		



Exhibit	Description
1015	Declaration of Talin Gordnia In Support of LAM's Unopposed Motion for <i>Pro Hac Vice</i> Admission
1016	"Balun Transformers", https://www.minicircuits.com/pages/BalunApplicatioNote.htm (printed June 17, 2016).
1017	THE RADIO HANDBOOK, Ed. William I. Orr (16th edition) (1962).
1018	U.S. Patent RE40,264 E
1019	Figure 3(b)
1020	Figures 3(a)
1021	Deposition of Daniel L. Flamm, Sc. D., Oakland, California, Tuesday, July 26, 2016
1022	Second Declaration of Joseph L. Cecchi, Ph.D.
1023	Rudolf F. Graf, MODERN DICTIONARY OF ELECTRONICS (6th edition) (1984)
1024	Doug Jorgesen and Christopher Marki, "Balun Basics Primer, A Tutorial on Baluns, Balun Transformers, Magic-Ts, and 180° Hybrids," Marki Microwave (2014).



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