

**Claim 3 of U.S. Patent No. 6,784,552, Nulty *et al.***  
**(“the ’552 Patent”) is obvious under 35 U.S.C. § 103 over Heath in view of Havemann**

Prior Art Cited in this Chart:

U.S. Patent No. 4,686,000, Heath (“Heath”)

U.S. Patent No. 5,482,894, Havemann (“Havemann”)

<b>Claim Language</b>	<b>Heath in view of Havemann</b>
<b>Claim 3</b>	
The semiconductor apparatus of claim 1 wherein said etch stop material comprises silicon dioxide.	“The selective etch process is designed to remove material from the second dielectric layer faster than it removes material from the first dielectric layer. Silicon nitride and silicon dioxide (of different varieties) are used for the dielectric layers; relative etch selectivity for the best of such dielectric combinations is on the order of 10:1.” <b>Havemann at column 1, lines 55-60.</b>