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UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

ASML NETHERLANDS B.V., EXCELITAS TECHNOLOGIES CORP., AND QIOPTIQ
PHOTONICS GMBH & Co. KG,
Petitioners

v.

ENERGETIQ TECHNOLOGY, INC.,
Patent Owner.

Case IPR2016-00570

**PETITION FOR *INTER PARTES* REVIEW OF
U.S. PATENT NO. 7,786,455
CLAIMS 1-9, 15, 16**

TABLE OF CONTENTS

I.	MANDATORY NOTICES	1
A.	Real Parties-in-Interest	1
B.	Related Matters.....	1
C.	Counsel	2
D.	Service Information.....	2
II.	CERTIFICATION OF GROUNDS FOR STANDING	3
III.	OVERVIEW OF CHALLENGE AND RELIEF REQUESTED	3
A.	Grounds for Challenge	3
B.	Prior Art Patents and Printed Publications Relied Upon	3
C.	Relief Requested.....	4
IV.	PERSON OF ORDINARY SKILL IN THE ART	5
V.	OVERVIEW OF THE '455 PATENT	5
A.	Summary of the Prosecution History	7
VI.	CLAIM CONSTRUCTION	8
A.	“Light source”	9
B.	“High brightness light”	11
VII.	THE CHALLENGED CLAIMS ARE INVALID.....	15
A.	Laser Sustained Plasma Light Sources Were Known Long Before the Priority Date of the '455 Patent.....	15
B.	Using a dichroic mirror to separate light of different wavelengths was well known in the art.....	17
VIII.	GROUND FOR FINDING THE CHALLENGED CLAIMS INVALID... 18	
A.	Ground 1: Claims 1, 6, 7, 8, 9, 15 are unpatentable over Gärtner in view of Ito	19
(a)	Gärtner and Ito are each prior art that was not considered by the Patent Office during examination.....	19
(b)	Claim 1 is obvious by Gärtner in view of Ito.....	20
(c)	Dependent Claim 6 is unpatentable over Gärtner in view of Ito .	33
(d)	Dependent Claim 7 is unpatentable over Gärtner in view of Ito .	34

(e)	Dependent Claim 8 is unpatentable over Gärtner in view of Ito	.34
(f)	Dependent Claim 9 is unpatentable over Gärtner in view of Ito	.35
(g)	Dependent Claim 15 is unpatentable over Gärtner in view of Ito	36
(h)	Reasons to combine claims 6-9 and 15	36
B.	Ground 2: Claims 2, 3, 4, 5 are unpatentable over Gärtner in view of Ito and further in view of Ershov	37
(a)	Gärtner, Ito, and Ershov are each prior art that was not considered by the Patent Office during examination	37
(b)	Dependent Claim 2 is unpatentable over Gärtner in view of Ito and further in view of Ershov	38
(c)	Dependent Claim 3 is unpatentable over Gärtner in view of Ito and further in view of Ershov	40
(d)	Dependent Claim 4 is unpatentable over Gärtner in view of Ito and further in view of Ershov	40
(e)	Dependent Claim 5 is unpatentable over Gärtner in view of Ito and further in view of Ershov	41
(f)	Reasons to combine	42
C.	Ground 3: Claim 16 is unpatentable over Gärtner in view of Ito and further in view of Mourou and Jeong	46
(a)	Gärtner, Ito, Mourou, and Jeong are each prior art that was not considered by the Patent Office during examination	46
(b)	Dependent Claim 16 is unpatentable over Gärtner in view of Ito and further in view of Mourou and Jeong	47
(c)	Reasons to combine	50
IX.	RESPONSE TO ARGUMENTS RAISED BY PATENT OWNER IN ITS PRELIMINARY INJUNCTION MOTION	53
A.	Patent Owner’s Arguments Regarding the Content of the Prior Art	53
(a)	High Brightness Light	53
B.	Patent Owner’s Arguments Regarding Objective Indicia of Non-Obviousness	58
X.	CONCLUSION	60

I. MANDATORY NOTICES

A. Real Parties-in-Interest

ASML Netherlands B.V., Excelitas Technologies Corp., and Qioptiq Photonics GmbH & Co. KG (“Petitioners”) are the real parties-in-interest.

B. Related Matters

U.S. Patent No. 7,786,455 (“the ’455 patent,” Ex. 1101) is one member of a patent family of continuation, continuation in part, and divisional applications. Exhibit 1102 shows the U.S. members of this patent family and the relationships among them. Petitioners have already filed petitions seeking *inter partes* review of the ’455 patent, and of related U.S. Patent Nos. 7,435,982 (“the ’982 patent”); 8,309,943 (“the ’943 patent”); 8,525,138 (“the ’138 patent”); 8,969,841 (“the ’841 patent”); and 9,048,000 (“the ’000 patent”), as summarized below:

Patent No.	IPR No.	Challenged Claims	Status
7,435,982	IPR2015-01300 IPR2015-01303	1, 3-4, 10, 16, 21, 24-27, 30, 31, 34, 37, 42-43, 49, 55, 61-64, 67, 68, 71, 72, 74, and 78	Instituted on all challenged claims
7,435,982	IPR2015-01377	23 and 60	Instituted on all challenged claims
7,786,455	IPR2015-01279	19, 39-41	Instituted on all challenged claims
8,309,943	IPR2015-01277	1, 3, 13, and 16	Instituted on all challenged claims
8,525,138	IPR2015-01368	1-5	Instituted on all challenged claims
8,969,841	IPR2015-01362	1, 2, 3, and 7	Instituted on all challenged claims

U.S. Patent 7,786,455
Petition for *Inter Partes* Review

8,969,841	IPR2016-00127	10, 13, 14	Pending
9,048,000	IPR2015-01375	1, 15, and 18	Instituted on all challenged claims
9,048,000	IPR2016-00126	7-10	Pending

Petitioners are also filing additional petitions on the '455, '982, '943, '138, '841, and '000 patents, as well as on the related U.S. Patent No. 9,185,786 ("the '786 patent"). Petitioners request that the *inter partes* reviews of all the '455, '982, '943, '138, '841, '000, and '786 patents be assigned to the same Panel for administrative efficiency.

The following litigation matters would affect or be affected by a decision in this proceeding: *Energetiq Tech., Inc. v. ASML Netherlands B.V., et al*, Civil Action No. 1:15-cv-10240-LTS (D. Mass.) and *In the Matter of Certain Laser-Driven Light Sources, Subsystems Containing Laser-Driven Light Sources, and Products Containing Same*, Inv. No. 337-TA-983.

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