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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 IPR2016-00583

**PETITION FOR *INTER PARTES* REVIEW OF
U.S. PATENT NO. 7,435,982
CLAIMS 2, 5-9, 12-15, 20, 22, 28, 29, 35, AND 36**

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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. 7,435,982 (the “’982 patent,” Ex. 1301) is one member of a patent family of continuation and continuation-in-part applications. Exhibit 1302 shows the members of this patent family and the relationships among them.

Petitioners have already filed petitions seeking *inter partes* review of claims 1, 3, 4, 10, 16, 21, 23-27, 30, 31, 34, 37, 42, 43, 49, 55, 60-64, 67, 68, 71, 72, 74, and 78 of the ’982 patent (*see* Case Nos. IPR2015-01303 (Paper 2); IPR2015-01300 (Paper 4); IPR2015-01377 (Paper 4)). On November 30, 2015, the Board consolidated Case Numbers IPR2015-01303 and IPR2015-01300, and instituted *inter partes* review on all claims challenged in the three petitions. (*See* Case No. IPR2015-01303 (Paper 15); *see also* Case No. IPR2015-01300 (Paper 13); Case No. IPR2015-01377 (Paper 11).)

Petitioners are also seeking *inter partes* review of related U.S. Patent Nos. 7,786,455 (“the ’455 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:

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