

***Samsung Electronics Co., Ltd.***  
***Petitioner***

***v.***

***DSS Technology Management, Inc.***  
***Patent Owner***

**Case IPR No. 2016-00782**  
**U.S. Patent No. 6,784,552**

**Samsung's Hearing Illustratives**

**June 20, 2017**

## Anticipated Grounds

Claims 1, 2, and 4-12 are unpatentable as anticipated by Kuesters

Claim 3 is unpatentable as obvious over the combination of Kuesters + Havemann

Claims 1, 2, and 4-7 are unpatentable as obvious over the combination of Kuesters + Heath

Claim 3 is unpatentable as obvious over the combination of Kuesters + Heath + Havemann

## Disputes

- Whether Kuesters discloses an acute angle greater than  $85^\circ$  between a side of the insulating spacer and the substrate surface (claims 1-12)
- Whether limitations from the specification should be read into the claims (claims 1-12)
- Whether Heath's teaching that a sidewall spacer is an optional feature impacts the motivations to combine Kuesters and Heath (claims 1-12)

## 2 Patent, Claim 1

1. A structure, comprising:
  - (a) a conductive layer disposed over a substrate;
  - (b) a first insulating layer on the conductive layer;
  - (c) a contact region in said first insulating layer;
  - (d) at least one insulating spacer in the contact region adjacent to the first insulating layer; and
  - (e) an etch stop material over said first insulating layer and adjacent to the insulating spacer, the etch stop material being a different material from the insulating spacer, wherein a side of the insulating spacer has an angle relative to the substrate surface that is either a right angle or an acute angle of more than 85°.

*SAMSUNG-1001 ('552 Patent), Claim 1.*

## 2 Patent, Claim 8

8. A structure, comprising:

- (a) a first electrically conductive material formed in and/or on a surface of a substrate;
  - (b) a contact opening in a region adjacent to a second electrically conductive material formed on the substrate;
  - (c) an electrically insulative spacer in the contact opening adjacent to the second electrically conductive material;
  - (d) an etch stop material over the electrically insulative spacer and the first and second electrically conductive materials, the etch stop material being a different material from the insulative spacer;
  - (e) a blanket layer over the etch stop material; and
  - (f) an opening through a first part of the etch stop material to the first electrically conductive material,
- wherein a side of the electrically insulative spacer has an angle relative to the substrate surface that is either a right angle or an acute angle of more than 85°.

*SAMSUNG-1001 ('552 Patent), Claim 8.*

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