

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

TAIWAN SEMICONDUCTOR MANUFACTURING COMPANY, LTD.,
Petitioner,

v.

GODO KAISHA IP BRIDGE 1,
Patent Owner.

Case IPR2016-01246[†]
Patent 7,126,174 B2

PETITIONER'S REPLY TO PATENT OWNER'S RESPONSE

[†] Case IPR2016-01247 has been consolidated with this proceeding.

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1. IPB identifies nothing in *Noble* and *Ogawa* to discourage a POSITA from using their STI teachings with *Lee* or *Lowrey*.36

2.	It is irrelevant to patentability that <i>Lee</i> 's and <i>Lowrey</i> 's first-named inventors knew of STI in 1989 and 1990.	37
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