

Filed on behalf of Godo Kaisha IP Bridge 1

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UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

TAIWAN SEMICONDUCTOR MANUFACTURING COMPANY LIMITED,
and GLOBALFOUNDRIES U.S. INC.,
Petitioners,

v.

GODO KAISHA IP BRIDGE 1,
Patent Owner.

Case Nos. IPR2016-01246¹
U.S. Patent No. 7,126,174 B2

PATENT OWNER'S REQUEST FOR ORAL ARGUMENT

¹ Case IPR2016-01247 has been consolidated with this proceeding.

GlobalFoundries U.S. Inc.'s motions for joinder in Cases IPR2017-00925 and IPR2017-00926 were granted.

Pursuant to 37 C.F.R. §42.70(a) and the Scheduling Order dated January 4, 2017 (Paper No. 9), Patent Owner respectfully requests oral argument regarding the patentability of the challenged claims of the '174 patent. The Scheduling Order indicates that oral argument (DUE DATE 7) will be held on August 8, 2017.

Patent Owner believes that 1½ hours for each side will be sufficient to cover the issues in consolidated Cases IPR2016-01246 and IPR2016-01247.

Patent Owner requests (without waiving consideration of any issue not listed below) to address the following issues during oral argument:

1. Whether Petitioner has met its burden of proof that the challenged claims of the '174 patent, when properly construed, are unpatentable for obviousness based upon the grounds of rejection specified in the Petition, and for which institution was granted.
2. Whether Petitioner failed to make out a *prima facie* case of obviousness in the Petition by not explaining “how” references would have been combined by a person having ordinary skill in the art at the time of the invention.
3. Whether rejections properly before the Board based upon entirely conclusory Expert evidence can support a finding of invalidity in this case.
4. The significance of Petitioner’s changes in position between the Petition and the Reply, and the weight to be given to the new arguments and evidence presented in the Reply.

5. Claim construction for the phrase “L-shaped sidewalls”
6. The issues raised in the Petitions, Patent Owner’s Preliminary Responses, the Decision to Institute, Patent Owner’s Response, Petitioner’s Reply to Patent Owner’s Response, and Patent Owner’s Sur-Reply.
7. Whether evidence should be excluded as identified in Patent Owner’s Motion To Exclude Evidence.
8. If filed, any additional issues raised by Patent Owner in any other motion or paper filed by Patent Owner before oral argument.
9. If filed, any additional issues raised by Petitioner in a request for oral argument, in any motion to exclude, or in any other motion or paper filed by Petitioners before oral argument.
10. Any other issues on which the Board seeks clarification.

Patent Owner requests permission to present handouts of demonstrative exhibits and to use audio-visual equipment to display demonstrative exhibits, including a projector. In accordance with Trial Practice Guide, 77 Fed. Reg. 45756, 48768, Patent Owner will also contact the Board Trial Division paralegal to discuss the request.

Dated: July 12, 2017

Respectfully Submitted by:

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*Attorney for Patent Owner,
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true copy of the foregoing:

PATENT OWNER'S REQUEST FOR ORAL ARGUMENT

was served by electronic mail on this 12th day of July, 2017, upon Counsel for
Petitioners, as follows:

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