

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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TAIWAN SEMICONDUCTOR MANUFACTURING COMPANY, LTD.,  
Petitioner,

v.

GODO KAISHA IP BRIDGE 1,  
Patent Owner.

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Case IPR2016-01246<sup>†</sup>  
Patent 7,126,174 B2

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**JOINT LIST OF OBJECTIONS TO DEMONSTRATIVES**

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<sup>†</sup> Case IPR2016-01247 has been consolidated with this proceeding.

**Petitioner** objects to Patent Owner's **slides 8, 9, 66, 68-71, 91, 92 and 124**. **Slides 66, 68 and 69** incorrectly show processes Petitioner suggested for putting STI into Lowrey by forming the channel-stop before etching the trench. *Compare* Phases I–III, *with* Paper 21, at 21. In addition, slides **66 and 69** represent a new position not in any exhibit or paper filed. **Slides 8, 9, 66, 68-71, 91, and 92** merely cite the Sur-Reply and only contain attorney argument, not evidence, and do not respond to the Reply. **Slides 8 and 9** discuss diffusion, and slides **91 and 92** discuss photolithography, both of which could have been in the Response. **Slide 124** only has part of a speech by Patent Owner's attorney during a deposition, with no witness testimony.

**Patent Owner** objects to all of Petitioner's slides because they are in the form of a brief with dividers and banners that present a narrative. This violates the PTAB's Order (Paper 28), which states, "No further briefing . . . .", e.g., see Petitioner's **Slides 30, 40, 42, 62, 67, 75, 81, 83, 95, 106 and 113**. **Slides 9-10, 13, 24-25, 30, 32-33 35-37, 41, 60-65, 67, 69, 71, 77, 82, 88, 95, 106-107, 109, 113, 118, 121-122, 129-130, and 132** contain attorney argument in the body of the slide. **Slides 31 and 33** contain new arguments not in the Petition. **Slides 89, 95, 116, 122** improperly cite to or lack a cite to the record. **Slide 106** is factually incorrect and misrepresents the process sequence of *Lowrey* with *Noble/Ogawa*. Although not mentioned, issues raised in the Motions to Exclude are preserved.

Dated: August 3, 2017

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Respectfully submitted,

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**CERTIFICATE OF SERVICE**

Pursuant to 37 C.F.R. § 42.6(e), this is to certify that I served a true and correct copy of the **JOINT LIST OF OBJECTIONS TO DEMONSTRATIVES** by electronic mail, on this 3rd day of August, 2017, on counsel of record for the Patent Owner as follows:

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