

Filed on behalf of Godo Kaisha IP Bridge 1

**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 LIMITED,  
Petitioner,

v.

GODO KAISHA IP BRIDGE 1,  
Patent Owner.

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Case IPR2016-01246<sup>1</sup>  
U.S. Patent No. 7,126,174

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**DECLARATION OF MR. HAJIME OGAWA IN SUPPORT OF  
PATENT OWNER'S MOTION TO EXCLUDE**

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<sup>1</sup> 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.

Exhibit 2074  
TSMC v. IP Bridge  
IPR2016-01246

I, Hajime Ogawa, hereby declare as follows:

1. I make this declaration in support of Patent Owner Godo Kaisha IP Bridge 1 (“IP Bridge”) for *Inter Partes* Review of Claims 1-12 and 14-18 of 7,126,174 (Exhibit 1001) (“the ‘174 Patent”).

2. I was employed by Matsushita Electric Industrial Co., Ltd. (currently Panasonic Corporation by a change of name in 2008)(“Matsushita”) as an EDA software engineer (logic synthesis of LSI) in October 1995 following a six month training period beginning April 1995. During my employment with Matsushita, I was an engineer in the development section regarding LSI and software products for 12 years; I joined the IP strategical section for development of LSI and software products in 2007; I joined the IP section of semiconductor company in April 2010; and I joined the IP section of home appliance company in January 2012. Beginning April 2014, I left Matsushita and was employed by Nittobo, a glass fiber company, as a manager of IP section. Thereafter, I began employment with IP Bridge in March 2015.

3. I have reviewed the cover page of the ‘174 Patent (Ex. 1001) and the cover page indicates that the ‘174 Patent was filed as Application No. 10/995,283, on November 24, 2004, and is a divisional of Application No. 10/454,682, filed June 5, 2003, now U.S. Pat. No. 6,967,409, which is a divisional of Application No. 09/902,157, filed July 11, 2001, now U.S. Pat. No. 6,709,950, which is a divisional of Application No. 08/685,726 (“the ‘726

application”), filed July 24, 1996, which is now U.S. Pat. No. 6,281,562 (“the ‘562 Patent), and claims priority from JP 7-192181, filed July 27, 1995 and JP 7-330112, filed December 19, 1995.

4. I have reviewed the cover page of U.S Patent No. 5,733,812 to Ueda et al. (“Ueda”) (Ex. 1014) and note that Ueda is indicated to have been filed as Application No. 571,131, on December 12, 1995, and is a continuation-in-part of Serial No. 340,341, filed November 14, 1994, abandoned, and claims priority of JP 5-284820, filed November 15, 1993, and JP 7-278546, filed October 26, 1995.

5. Therefore, during the period from the filing of the first Japanese priority application of the ‘174 Patent, i.e., JP 7-192181, on July 27, 1995, through the July 24, 1996 filing of U.S. Application No. 08/685,726, which is the earliest listed U.S. application from which the ‘174 Patent claims priority (“the relevant period”), I was employed by Matsushita.

6. I am familiar with the customary practice of Matsushita during this time period wherein each engineer, during his course of employment at Matsushita, was under an obligation to assign all inventions made by the engineer during the term of their employment that (i) related to the business or research and development activities of Matsushita, (ii) were suggested by or arose out of or in connection with their employment at Matsushita, or (iii) resulted from the use of Matsushita’s time, materials, or facilities. This

obligation is customarily memorialized in documents entitled, “Basic Rules for Intellectual Property Matters”.

7. Moreover, in addition to the Basic Rules for Intellectual Property Matters, prior to filing an application for any invention, ordinarily a Japanese application, each person to be named as an inventor in the first filed application was required to sign a document assigning the invention to Matsushita.

8. I understand that Matsushita has not been able to locate copies or complete copies of documents for either the ‘174 Patent or Ueda. Regardless, I can state that based upon my review of the following documents and the customary practice at Matsushita during the relevant time period, each of the inventors of the ‘174 Patent and each of the inventors of Ueda was under an obligation to assign and/or assigned the inventions of each of the ‘174 Patent and Ueda to Matsushita.

9. The cover pages of the ‘174 Patent (Ex. 1001) and the ‘562 patent (Ex. 2061) each list the inventors as follows:

Mizuki Segawa

Isao Miyanaga

Toshiki Yabu

Takashi Nakabayashi

Takashi Uehara

Kyoji Yamashita

Takaaki Ukeda

Masatoshi Arai

Takayuki Yamada

Michikazu Matsumoto

10. The cover pages of the '174 Patent (Ex. 1001) and the '562 patent (Ex. 2061) each list the Japanese priority applications as follows:

JP 7-192181, filed July 27, 1995

JP 7-330112, filed December 19, 1995

11. The first and last pages of JP H9-172063 (Exs. 2062, 2063) show that JP H9-172063 claims priority to the H7-330112 priority application that is listed on the cover pages of the '174 Patent (Ex. 1001) and the '562 Patent (Ex. 2061); lists Matsushita Electric Industrial Co., Ltd. as the Applicant; and each of the following inventors:

Toshiki Yabu

Takashi Uehara

Mizuki Segawa

Takashi Nakabayashi

Kyoji Yamashita

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