

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

Taiwan Semiconductor Manufacturing Company Limited

Petitioner

v.

Godo Kaisha IP Bridge 1

Patent Owner

DECLARATION OF THOMAS E. GORMAN

**FOR *INTER PARTES* REVIEW OF UNITED STATES
PATENT NO. 6,538,324**

IPR2016-01264 and IPR2016-01249

I, Thomas E. Gorman, declare as follows:

1. I am an attorney in Kecker, Van Nest & Peters LLP's offices in San Francisco, California.


2. I am counsel for Taiwan Semiconductor Manufacturing Company, Ltd. ("TSMC") retained in connection with *Godo Kaisha IP Bridge 1 v. Broadcom Corp., Broadcom Limited, Avago Technologies, Ltd., Avago Technologies U.S., Inc., and LSI Corp.*, Case No. 2:16-cv-00134-JRG-RSP, in the Eastern District of Texas. Among other things, the plaintiff ("IP Bridge") alleged that each of the defendants infringed U.S. Patent No. 6,538,324. *See* Ex. A (PACER Docket).

3. The defendants served their Patent Rule 3-3 Invalidity Contentions on June 20, 2016. Ex. B (E.D. Tex. Patent Rule 3-3) at 7; Ex. C (Docket Control Order) at 4; Ex. D (Defendants' Notice of Compliance Regarding P.R. 3-3 and 3-4 Disclosures). Counsel for the defendants provided me with a copy of their as-served Invalidity Contentions, which TSMC filed as Exhibit 1037 in both *inter partes* review proceedings IPR2016-01264 and IPR2016-01249. Exs. E and F.

4. TSMC's Exhibit 1037 is a true and correct copy of the Defendants' Patent Rule 3-3 Invalidity Contentions and their attached Appendices B-1 to B-15, as received from defendants' counsel in the above-identified litigation. *See id.* at 60-229 (Appendices B-1 to B-15).

5. I declare that all statements made herein of my own knowledge are true and that all statements made on information and belief are believed to be true; and further that these statements were made with the knowledge that willful false statements and the like so made are punishable by fine or imprisonment, or both, under Section 1001 of Title 18 of the United States Code.

Dated: June 8, 2017

By: 

Thomas E. Gorman