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.

Cases. IPR2016-01249 and IPR2016-01264¹ U.S. Patent No. 6,538,324

JOINT LIST OF OBJECTIONS TO DEMONSTRATIVES

¹ GlobalFoundries U.S. Inc.'s motion for joinder in Cases IPR2017-00919 and IPR2017-00920 was granted.



Petitioner objects to Patent Owner slides 9, 14, and 57.

Slide 57 is objected to because it contains new arguments about Figure 1 from Exhibit 2039, which is a figure that Patent Owner did not previously rely upon in its Motion to Amend.

Slide 14 contains new arguments because Patent Owner only cited to Exhibit 1004, 3:62-64 in its Patent Owner Response, but copies a larger disclosure from 3:62-67 (including an additional sentence not previously relied upon) in this slide.

Slide 9 contains new arguments because Patent Owner only cited to Exhibit 1004, 9:47 in its Patent Owner Responses, but copies a larger disclosure from 9:47-50 in this slide.

Patent Owner objects to Petitioner's slides 16, 30, 31, 35, 38, 39, 51, 50 and 64 for the reasons set forth below:

Slides 35 and 51 refer to new evidence Ex.1033 in its Replies to support its case-in-chief, and neither exhibit is cited in the Petitions or Responses. These exhibits should be limited to the Contingent Motion to Amend.

Slides 38 and 64 refer to new evidence Ex.2042 in its Replies to support its case-in-chief, and neither exhibit is cited in the Petitions or Responses. These exhibits should be limited to the Contingent Motion to Amend.

Slides 16, 30, 31, 39 and 50 are objected to for referring to new arguments and/or new evidence not raised or cited in the Petitions.



Date: August 3, 2017

Respectfully submitted,

By: /Stephen E. Kabakoff/

Stephen E. Kabakoff

Michael J. Fink

Reg. No. 51,276

Reg. No. 31,827

Backup Counsel for Petitioner Lead Counsel for Patent Owner



CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing **JOINT LIST**

OF OBJECTIONS TO DEMONSTRATIVES was served on August 3, 2017,

via email directed to counsel of record for the Patent Owner at the following:

Michael J. Fink (Reg. No. 31,827) mfink@gbpatent.com

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Patent Owner has agreed to electronic service.

A copy of the foregoing JOINT LIST OF OBJECTIONS TO

DEMONSTRATIVES was also served on August 3, 2017, via email directed to counsel of record for Petitioner GlobalFoundries U.S. Inc. at the following:

David Tennant (dtennant@whitecase.com); Shamita Etienne-Cummings (setienne@whitecase.com); Allen Wang (allen.wang@whitecase.com); wcptab@whitecase.com; WCGlobalFoundriesIPR1Team@whitecase.com.



Dated: August 3, 2017 By: /Lauren K. Young/ Lauren K. Young

Litigation Legal Assistant

FINNEGAN, HENDERSON, FARABOW,

GARRETT & DUNNER, L.L.P.

