

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,
Petitioner,

v.

GODO KAISHA IP BRIDGE 1,
Patent Owner.

Case IPR2016-01264
U.S. Patent No. 6,538,324

**PATENT OWNER'S NOTICE OF SUPPLEMENTAL EVIDENCE IN
RESPONSE TO PETITIONER'S OBJECTIONS TO EXHIBITS**

Mail Stop PATENT BOARD, PTAB
Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

Patent Owner, Godo Kaisha IP Bridge 1 (“Patent Owner”), submits this Notice of Supplemental Evidence in Response to “Petitioner’s Objections to Patent Owner’s Exhibits 2001-2004” dated January 3, 2017. In response to Petitioner’s objections, Patent Owner serves herewith supplemental evidence, identified as Exhibits 2005, 2006 and 2007 pursuant to 37 C.F.R. § 42.64(b)(2). Patent Owner further files and serves herewith Patent Owner’s Current Exhibit List pursuant to 37 C.F.R. § 42.63(e). Patent Owner’s Current Exhibit List identifies its supplemental evidence, Exhibits 2005, 2006 and 2007.

I. Petitioner’s Objections to Exhibit 2001

Petitioner objects to Exhibit 2001 under FRE 401-403 alleging that the exhibit is irrelevant because it presents cumulative information. Exhibit 2001 does not present cumulative information.

Petitioner objects to Exhibit 2001 as hearsay under FRE 802. Exhibit 2001 is not inadmissible hearsay under FRE 801, and would nevertheless be admissible under one or more of the hearsay exceptions under FRE 803 and 807, *e.g.*, FRE 803(18). In the event Patent Owner seeks to exclude Exhibit 2001 for any reason, Patent Owner reserves the right to seek judicial notice under FRE 201 of scientific facts contained therein, the accuracy of which Petitioner has not disputed.

II. Petitioner's Objections to Exhibit 2002

Petitioner objects to Exhibit 2002 under FRE 401-403 as irrelevant. Exhibit 2002, a portion of the prosecution history of the Ding patent, is not irrelevant. Exhibit 2002 is additional evidence of how a person of ordinary skill in the art would have understood the *Ding* patent at the relevant time period. Exhibit 2002 confirms the express teachings in the *Ding* patent.

In the event Patent Owner seeks to exclude Exhibit 2002, Patent Owner reserves the right to seek judicial notice under FRE 201 of undisputed statements contained therein.

III. Petitioner's Objections to Exhibits 2003 and 2004

Petitioner objects to Exhibits 2003 and 2004 under FRE 401-403 as irrelevant because of the dates of the dictionary definitions. Exhibits 2005 and 2006 are submitted to overcome these objections. Exhibit 2007 authenticates these exhibits.

In the event Patent Owner seeks to exclude Exhibits 2003 and 2004, or Exhibits 2005 and 2006, Patent Owner reserves the right to seek judicial notice under FRE 201 of the apparently undisputed dictionary definitions.

Patent Owner reserves all rights to respond to any further explanations Petitioner is allowed to provide regarding its evidentiary objections. Patent Owner's service of supplemental evidence is timely under 37 C.F.R. § 42.64(b)(2)

because it is served within 10 business days of the service of Petitioner's
objections.

Dated: January 11, 2017

Respectfully Submitted by:

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*Attorney for Patent Owner,
IP Bridge*

CERTIFICATE OF SERVICE

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

**PATENT OWNER'S NOTICE OF SUPPLEMENTAL EVIDENCE IN
RESPONSE TO PETITIONER'S OBJECTIONS TO EXHIBITS**

including exhibits, was served by electronic mail on this 11th day of January,
2017, upon Counsel for Petitioner, as follows:

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