

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

DECLARATION OF RUMIKO WHITEHEAD

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

I, Rumiko Whitehead, declare as follows:

1. I am a paralegal at the law firm of Greenblum & Bernstein, P.L.C.
2. I provide this Declaration in connection with the above-identified *Inter Partes* Review proceeding.
3. Exhibit 2001 is a true copy of Chang, C.C., Chen, J.S. and Hsu, W.S., “Failure Mechanism of Amorphous and Crystalline Ta-N Films in the Cu/Ta N/Ta/SiO₂ Structure.” *Journal of The Electrochemical Society*, **151**(11), pp.G746-G750 (2004). I added an exhibit label and pagination labels.
4. Exhibit 2003 is a true copy of a dictionary definition of “amorphous” from Merriam-Webster.com., which I downloaded from <http://www.merriam-webster.com/dictionary/amorphous> on September 30, 2016. I highlighted the word “amorphous.” I added an exhibit label and pagination labels.
5. Exhibit 2004 is a true copy of a dictionary definition of “nitride” from Merriam-Webster.com which I downloaded from <http://www.merriam-webster.com/dictionary/nitride> on September 30, 2016. I highlighted the word “nitride.” I added an exhibit label and pagination labels
6. Exhibit 2008 is a true copy of excerpts from a dictionary, Guralnik, D. B., ed., *Webster’s New World Dictionary of the American Language*, Prentice Hall Press (1979). I scanned the title page, copyright page, and page 16 of the dictionary, and then added an exhibit label and pagination labels. I also

highlighted the word “amorphous”. The copyright page indicates that the copyright years of the dictionary are 1976 and 1979.

7. Exhibit 2009 is a true copy of excerpts from a dictionary, Grant, J., ed., *Hackh’s Chemical Dictionary*, 4th ed., McGraw-Hill (1969). I scanned the title page, copyright page, and page 457 of the dictionary, and then added an exhibit label and pagination labels. I also highlighted the definition of “nitride”. The copyright page indicates that the copyright year of the dictionary is 1969.

8. Exhibit 2010 is a copy of Sienko, M.J., Plane, R.A. *Chemistry*. 2d ed. New York, McGraw-Hill, 1961, pp. 193-195. Print. I scanned the cover, title page, copyright page, and pages 192-195, and then added an exhibit label and pagination labels. The copyright page indicates that the copyright year of the dictionary is 1961.

9. Exhibit 2012 is a true copy of an excerpt from the USPTO Manual of Patent Examining Procedure (MPEP), Section 2111 Claim Interpretation; Broadest Reasonable Interpretation [R-07.2015], Subsection 2111.03 Transitional Phrases [R-08.2012], which I downloaded from <https://www.uspto.gov/web/offices/pac/mp/ep/index.html>. I added an exhibit label and pagination labels.

10. Exhibit 2013 is a true copy of the Claim Construction Memorandum And Order, November 9, 2016, pp. 31-32 (*Godo Kaisha IP Bridge 1 v. Broadcom*

Limited et al., USDC EDTEX 2:16-cv-00134-JRG-RSP). I added an exhibit label and pagination labels.

11. Exhibit 2014 is a true copy of JP H08-139092A downloaded from the European Patent Office's Espacenet Patent Search website. I added an exhibit label and pagination labels.

12. Exhibit 2015 is a verified English translation of JP H08-139092A. I added an exhibit label and pagination labels.

13. Exhibit 2016 is a true copy of JP H08-250596A downloaded from the European Patent Office's Espacenet Patent Search website. I added an exhibit label and pagination labels.

14. Exhibit 2017 is a verified English translation of JP H08-250596A. I added an exhibit label and pagination labels.

15. Exhibit 2018 is a true copy of JP H08-274098A downloaded from the European Patent Office's Espacenet Patent Search website. I added an exhibit label and pagination labels.

16. Exhibit 2019 is a verified English translation of JP H08-274098A. I added an exhibit label and pagination labels.

17. Exhibit 2020 is a true copy of JP H09-64044A downloaded from the European Patent Office's Espacenet Patent Search website. I added an exhibit label and pagination labels.

18. Exhibit 2021 is a verified English translation of JP H09-64044A. I added an exhibit label and pagination labels.

19. Exhibit 2022 is a true copy of JP H09-293690A downloaded from the European Patent Office's Espacenet Patent Search website. I added an exhibit label and pagination labels.

20. Exhibit 2023 is a verified English translation of JP H09-293690A. I added an exhibit label and pagination labels.

21. Exhibit 2024 is a true copy of JP H10-125627A downloaded from the European Patent Office's Espacenet Patent Search website. I added an exhibit label and pagination labels.

22. Exhibit 2025 is a verified English translation of JP H10-125627A. I added an exhibit label and pagination labels.

23. Exhibit 2026 is a true copy of JP H10-256256A downloaded from the European Patent Office's Espacenet Patent Search website. I added an exhibit label and pagination labels.

24. Exhibit 2027 is a verified English translation of JP H10-256256A. I added an exhibit label and pagination labels.

25. Exhibit 2028 is a true copy of JP H10-330938A downloaded from the European Patent Office's Espacenet Patent Search website. I added an exhibit label and pagination labels.

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