

DSS Infringement Contentions—Exhibit B
 '552 Patent

Infringement Contentions for US 6,784,552	
	<p>Plaintiff DSS Technology Management Inc. (“DSS”) serves its Infringement Contentions as to Defendants Intel, A Conn’ s, and Wal-Mart (“Defendants”). DSS contends that Defendants are each individually liable for infringement asserts infringement of claims 1-7.</p> <p>Intel has and continues to make, use, sell, import, and/or offer to sale in the United States systems and methods used semiconductor structures made via Intel’s 22-nanometer (“nm”) FinFET process (the “Accused Products”). The re sell, import, and/or offer to sale the Accused Products. DSS has attached a list of processors, known to it at this time Intel’s 22-nm FinFET process. See Exhibit 1. These infringement contentions apply equally to any other Intel semiconductor structures made by an equivalent method with similar functionality, regardless of the specific product or process name.</p> <p>To date, the parties in this litigation have not engaged in any discovery, and no documents have been produced. All these disclosures is the result of publicly available information and independent examination and analysis of the A these circumstances, DSS presents these Infringement Contentions reflecting DSS’s current analysis of the facts pr the best of DSS’s knowledge, information, and belief, formed after an inquiry that is reasonable under the circum contained in this disclosure is correct. Certain information about the Accused Products operation is not available w discovery. Accordingly, DSS reserves the right to seek leave to supplement and/or amend these disclosures as new available and as DSS has the opportunity to review relevant Defendant document productions. Infringement invest DSS anticipates that additional facts and relevant documents will be uncovered and disclosed that could create goo supplementation and/or amendment of these contentions. DSS will continue to develop the evidence of infringe entities, and DSS reserves the right to amend and supplement these Infringement Contentions.</p> <p>Furthermore, based on DSS’s view that certain Defendant systems, products, processes, and/or services could infri in multiple ways, DSS’s Infringement Contentions may include alternative theories of infringement for the Accuse mutually exclusive of other infringement theories or which may overlap with other infringement theories in certain</p>
Claim 1	Infringement Evidence
<p>1.A structure, comprising:</p>	<p>The Accused products contain semiconductor structures. Each of the 22 nanometer-process-based i3, i5, i7, Celer Xeon processors contains the infringing semiconductor structure. Unless otherwise noted, TEM images of a Core Upon information and belief, all processors made on Intel’s 22-nanometer (“nm”) FinFET process—including the Atom, and Xeon processors—have the same gate-to-contact structures. Thus, those processors infringe as well.</p>
<p>a) a conductive layer disposed over a substrate;</p>	<p>Infringing structures are found in the Accused products, including the Intel Core i7-4790 processor, which is made process.</p>

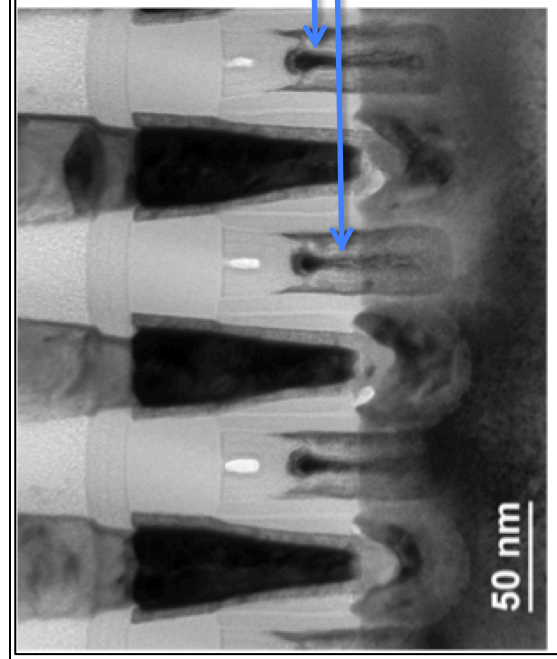
DSS Infringement Contentions—Exhibit B
'552 Patent



Source: DSS2-0000755

The Accused Products have a conductive layer disposed over a substrate. The substrate, likely a silicon substrate, bottom of the below image. Conductive layers, the gates, are over the substrate. In the FinFET configuration where dimensional channel region, the gate is formed on top of the substrate, which includes the fin.

DSS Infringement Contentions—Exhibit B
'552 Patent

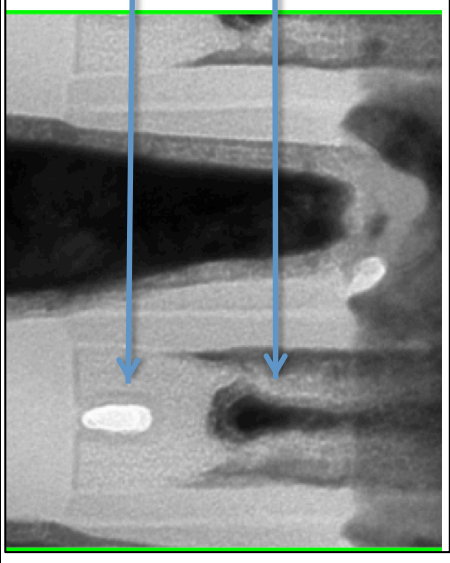


Source: DSS2-0000751

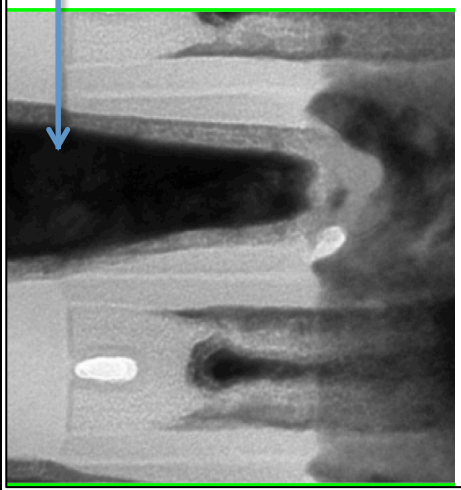
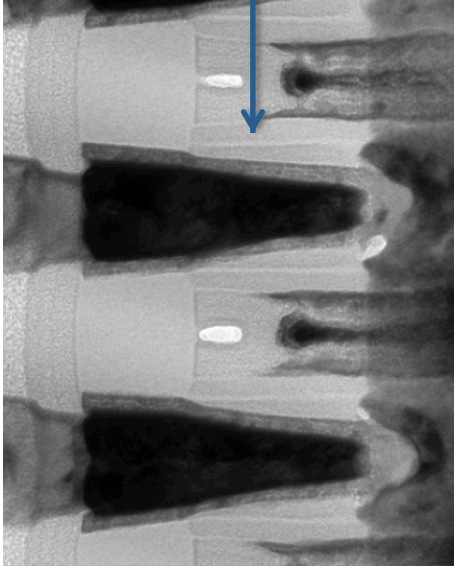
(b) a first insulating layer on the conductive layer:

The Accused Products have a first insulating layer on the conductive layer. The first insulating layer is the light gray conductive gate layer with a white “bead” in the center.

DSS Infringement Contentions—Exhibit B
'552 Patent

	 <p>The micrograph shows a cross-section of a substrate with a contact region. A white oval-shaped feature is labeled 'First insulating layer' with a blue arrow pointing to it. A dark, elongated feature is labeled 'Conductive layer' with a blue arrow pointing to it. The background is a light gray, textured surface.</p>
<p>(c) a contact region in said first insulating layer;</p>	<p>Source: DSS2-0000751.</p> <p>The Accused Products have a contact region in the first insulating layer. The contact region is the opening through which the contact is made to the substrate. Both “contact openings”—an opening through a dielectric opening through a dielectric layer between polysilicon and a first metal layer—and “vias”—an opening in other opening through an intermetal dielectric layer—are “contact regions.” The contact region is shown as the dark region of the picture to the diffusion region.</p>

DSS Infringement Contentions—Exhibit B
 '552 Patent

	 <p style="text-align: center;">contact region</p> <p style="text-align: center;">Source: DSS2-0000751.</p>
<p>(d) at least one insulating spacer in the contact region adjacent to the first insulating layer; and</p>	<p>The Accused Products include at least one insulating spacer in the contact region. The insulating spacers are adjacent to the first insulating layer. The insulating spacers are the vertical, light grey materials on either side of the conductive layers.</p>  <p style="text-align: center;">insulating spacer</p> <p style="text-align: center;">Source: DSS2-0000751</p>

Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.